

Lewisham Local Plan

Regulation 18 consultation statement

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

September 2022

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Blackheath Society no 2	2	EC 21	EC21 Visitor accommodation. Is there baseline data on existing visitor accommodation (amount, location, purpose) and forecast need for the future?	The London Plan suggests that 58,000 bedrooms of serviced accommodation across London will be needed by 2041. It does not set out need by Borough. This is set out in the policy supporting text.	No change.
Blackheath Society no 2	2	EC 22	EC22 Meanwhile [temporary] uses. We support the policy.	Support noted.	No change.
Telegraph Hill Society	2	General	<p>Changes to Permitted Development Rights are likely to challenge both the Council’s vision and its detailed policies as set out in Part Two of the Plan. Management of these will therefore require more engagement by the Council in Article 4 directions where appropriate. We appreciate that funds are not currently available to significantly extend protection through Article 4 directions, but that does not mean that this will be the case throughout the Plan period to 2040. A commitment should be made that, where and when appropriate, powers will be taken to ensure that the Vision as set out in the Plan is protected.</p> <p>The various policies in Part Two appear to conflict with each other as do policies within Part Two and Part Three. Instances will arise for example in conflicts between preserving local character as required in HE1 and Strategic Objective F13 and:</p> <ul style="list-style-type: none"> • optimising site-capacity (QD6), building tall towers (QD4) and preserving local character (HE1) • optimising the use of small housing sites (HO2) or developing infill sites (QD11) and preserving local heritage (HE1) • minimising greenhouse gas emissions (SD3) or • Managing heat risk (SD5). <p>73. Given that heritage assets and their surroundings, once destroyed, cannot ever be recovered we would prefer that the heritage policies are given precedence but, however this is decided, the Plan needs to give clarity as to which policies take precedence in the event of conflict. Otherwise the Plan is in danger of becoming a “developers’ charter” whereby one part of the Plan can be played off against another as developers pick and choose to their advantage, with the ever present threat of costly resolution through the courts.</p>	<p>Noted. The making of Article 4 Directions is outside the scope of the Local Plan. The Council may in the future consider the need to introduce additional Article 4 Directions to ensure the delivery of the spatial strategy.</p> <p>Whilst acknowledging that there are tensions between delivering growth and preserving heritage assets, the draft Local Plan is considered to strike an appropriate balance whilst taking a positive approach to new development, in line with the National Planning Policy Framework. The draft Local Plan part 2 policies also introduce a significant step change in the approach to sustainable design and construction, and will help give effect to the Council’s Climate Emergency Action Plan.</p>	No change.
Telegraph Hill Society	2	General	The status of each “Explanation” is unclear. There are a considerable number of statements of intent in the “Explanation” paragraphs (for instance at § 6.10 on Lewisham’s Historic Environment, see paragraph 136 on policy HE1 ; or on Telecommunications, see paragraph 224 on TR7) which are not carried through to a policy on the green pages and therefore do not seem to be explanations for the policy. If the “explanation” <i>obiter dicta</i> are meant to be policy they need to be reflected in the policy, if they are not and do not in fact explain a policy, an indication needs to be given as to what their purpose is and what weight will be given to them in	Noted. The policy supporting text provides justification for the approach and information to support its implementation. The policy supporting will be comprehensively reviewed and updated where officers consider changes are necessary.	Policy supporting text reviewed and updated throughout the Local Plan.

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

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

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

			Gardens on Leyland Rd. provide a small but well landscaped area for people to walk and exercise dogs but the play area is in great need of refurbishment. As more young families move into the area they will need more play areas and safe green spaces for their children.	<p>Part 2 policy GR1 sets out the policy framework to maximise opportunities for enhancing existing green infrastructure, including parks and open spaces, along with creating new provision particularly in areas of identified deficiency. Site specific requirements are also set out in the site allocation policies.</p> <p>In addition, Policy GR2 requires developers to give priority to measures that will encourage walking, cycling and other active travel modes along routes that links open spaces.</p> <p>Furthermore, the Council's Parks and Open Spaces Strategy has identified Edith Nesbit Gardens as a priority for park investment and improvement.</p>	
	2	GR	It appears that a map on page 8 of the Parks and Open Spaces Plan, which supports the Local Plan, seems to have identified only part of the Grove Park Nature Reserve, and that a section is coloured white, which could give developers an indication that this wooded area is available for development and result in the loss of some of our valued green space. Can this be rectified?	<p>Noted. Changes to the Parks and Open Spaces Strategy 2020 cannot be made since it has been adopted. The wooded area referenced is designated as Metropolitan Open Land and is therefore afforded the same level protection as Green Belt.</p> <p>A new policies map has been prepared. This clearly sets out the spatial extent of different land-use designations in the Local Plan. This is also reflected in the Changes to the adopted Policies Map document.</p>	A new policies map has been prepared. This clearly sets out the spatial extent of different land-use designations, including Metropolitan Open Land, in the Local Plan.
	2	GR	The plan should state the importance of developing new green spaces and also improving existing ones for leisure use as more families come into the area. For example, the Edith Nesbit Gardens on Leyland Rd. provide a small but well landscaped area for people to walk and exercise dogs but the play area is in great need of refurbishment. As more young families move into the area they will need more play areas and safe green spaces for their children. The infrastructure improvements needed for Lee Green's development should be explicitly outlined in Lewisham's Local Plan.	<p>Noted. The draft Local Plan recognises the important role played by green infrastructure in local neighbourhoods and communities.</p> <p>Part 2 policy GR1 sets out the policy framework to maximise opportunities for enhancing existing green infrastructure, including parks and open spaces, along with creating new provision particularly in areas of identified deficiency. Site specific requirements are also set out in the site allocation policies.</p> <p>In addition, Policy GR2 requires developers to give priority to measures that will encourage walking, cycling and other active travel modes along routes that links open spaces.</p> <p>Furthermore, the Council's Parks and Open Spaces Strategy has identified Edith Nesbit Gardens as a priority for park investment and improvement.</p>	No change.
	2	GR	The plan should state the importance of developing new green spaces and also improving existing ones for leisure use as more families come into the area. For example, the Edith Nesbit Gardens on Leyland Rd. provide a small but well landscaped area for people to walk and exercise dogs but the play area is in	Noted. The draft Local Plan recognises the important role played by green infrastructure in local neighbourhoods and communities.	No change.

			great need of refurbishment. As more young families move into the area they will need more play areas and safe green spaces for their children.	<p>Part 2 policy GR1 sets out the policy framework to maximise opportunities for enhancing existing green infrastructure, including parks and open spaces, along with creating new provision particularly in areas of identified deficiency. Site specific requirements are also set out in the site allocation policies.</p> <p>Furthermore, the Council's Parks and Open Spaces Strategy has identified Edith Nesbit Gardens as a priority for park investment and improvement.</p>	
	2	GR	The plan should state the importance of developing new green spaces and also improving existing areas for leisure use as more families come into the area. For example, the Edith Nesbit Gardens on Leyland Rd. provide a small but well landscaped area for people to walk and exercise dogs but the play area is in great need of refurbishment. As more young families move into the area they will need more play areas and safe green spaces for their children. The infrastructure improvements needed for Lee Green's development should be explicitly outlined in Lewisham's Local Plan.	<p>Noted. The draft Local Plan recognises the important role played by green infrastructure in local neighbourhoods and communities.</p> <p>Part 2 policy GR1 sets out the policy framework to maximise opportunities for enhancing existing green infrastructure, including parks and open spaces, along with creating new provision particularly in areas of identified deficiency. Site specific requirements are also set out in the site allocation policies.</p> <p>In addition, Policy GR2 requires developers to give priority to measures that will encourage walking, cycling and other active travel modes along routes that links open spaces.</p> <p>Furthermore, the Council's Parks and Open Spaces Strategy has identified Edith Nesbit Gardens as a priority for park investment and improvement.</p>	No change.
	2	GR	<p>Natural Heritage</p> <ul style="list-style-type: none"> There should be a recognition of the Great North Wood heritage, along the ridge from Sydenham Hill to New Cross. Although only pockets of actual woodland remain, it is still a dominant part of the natural tree-rich environment and a feature that can be used to enhance biodiversity and eco-system services in any developments in the area. Its status should be the same as the rivers and parks that have been mentioned in the plan. The Council should work with the London Wildlife Trust to formulate good environmental practice for all developments and enhancements of the natural resources in the Borough. There should Tree Protection Orders on all street trees and notable trees on private land throughout the borough, not just in conservation areas. The expectation must be that mature, healthy trees will be protected because of their amenity and eco-system services and a high level of evidence required, and mitigation provided, for any work on them to be approved. There needs to be a fundamental acknowledgment that the eco system and amenity services of mature, healthy trees cannot be replaced in the short or medium term by 	<p>Noted. Protecting and enhancing natural and historic assets like Great North Wood heritage is the heart of the local plan. Part 2 policy HE1 seeks to preserve or enhance the value and significance of Lewisham's historic environment and its settings.</p> <p>The Council, where appropriate, works with the London Wildlife Trust. For instance, they have been consulted as part of regulation 18 consultation.</p> <p>The recognition of the Great North Wood has been addressed elsewhere in Plan within Part Three under Lewisham's West Area.</p> <p>The Council's Parks and Open Spaces strategy sets out arrangements for managing open spaces.</p> <p>The Local Plan seeks to ensure development proposals maximise opportunities for tree planting, particularly on streets.</p> <p>Under current guidance, Tree Preservation Orders (TPOs) are not recommended where you have a responsible</p>	<p>In accordance with the Metropolitan Open land Review Additional Sites Report, the Forest Hill to New Cross green corridor has been designated as a proposed Metropolitan Open Land, which has the same level of protection as Green Belt.</p> <p>In accordance with the Open Space Review,</p>

			<p>saplings. The Climate Emergency is now and cannot be mitigated for in 50 – 100 years time. Replacement of large, especially native trees by ‘convenient’ smaller or exotic varieties should also be avoided, to give our native fauna and flora the maximum opportunity to thrive.</p> <ul style="list-style-type: none"> • Street trees, in planting pits that allow for wild plants and flowers beneath, should be an essential part of the Borough's green infrastructure and provided by the Council, not the preserve of residential areas wealthy enough to fund their own trees. We desperately need to see more pleasant green roads to walk and cycle along to help with the shift away from private vehicles. Reducing the number of cars is not enough; roads need to be inviting places to enjoy as part of getting from A to B. These would also be part of a vital network of green corridors for nature. • The air quality and safety for non-car users on the major roads, like the South Circular A205 needs urgent attention. There needs to be a better balance between pedestrian and motorist rights, which could work to the benefit of both. Eg, pedestrian crossings often take so long to change to the pedestrian's favour that they have long ago taken a chance and run across instead. Thus when the traffic is stopped, there are often no pedestrians waiting to cross. • The A205 crossing at Forest Hill Station is dangerous and needs to be changed as soon as possible, giving higher priority to pedestrians. • All open green spaces (other than sports ground) under the Council's control should be managed for wild flowers and grassland natural to the area, which are so essential to the insects which drive the food chain. • Trees and glades in parks and other woodland, should be managed for wildlife. This means that only trees or limbs that are dangerous should be removed and the importance of dead wood, both standing and on the ground, recognised as a very rich habitat. • All developments should be in the context of the rights of nature to exist and flourish in and for itself. We have to see an end to the exploitation of natural resources for human only benefit. 	<p>landowner who manages the trees. As most street trees are the responsibility of the Council, TPOs are not required. When the Council removes street trees, this is done for legitimate reasons, generally around safety concerns or subsidence issues. The Council is working with Street Trees for Living on an ongoing basis to increase the number of street trees within the borough.</p> <p>Following the Regulation 18 Consultation, an Open Space Review has been prepared to inform robust protections for open and green spaces, including Hillcrest Estate Woodland, within a clear hierarchy.</p>	<p>Hillcrest Woodland has been designated as proposed Strategic Open Space.</p> <p>Sydenham Hill Ridge has been identified as an Area of Special Local Character, via amendments to the schedules.</p>
	2	GR	<p>The plan should state the importance of developing new green spaces and also improving existing ones for leisure use as more families come into the area. For example, the Edith Nesbit Gardens on Leyland Rd. provide a small but well-landscaped area for people to walk and exercise dogs but the play area is in great need of refurbishment.</p>	<p>Noted. The draft Local Plan recognises the important role played by green infrastructure in local neighbourhoods and communities.</p> <p>Part 2 policy GR1 sets out the policy framework to maximise opportunities for enhancing existing green infrastructure, including parks and open spaces, along with creating new provision particularly in areas of identified deficiency. Site specific requirements are also set out in the site allocation policies.</p>	<p>No change.</p>

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

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

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

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

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

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

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

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

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

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

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

				The requirement for a suitably qualified ecologist/surveyor is considered appropriate; however the plan will be updated to specify 'chartered ecologist', to ensure professional standards are upheld.	
HopCroft Neighbourhood Forum	2	GR	<p>Crofton Park Ward</p> <ul style="list-style-type: none"> • Buckthorne Cutting Nature Reserve, Garthorne Road Nature Reserve, Duncombe HillGreen, Ewart Road Green and Crofton Park Railway Garden to be included as proposed Local Green Spaces • Buckthorne Cutting needs to be added to green space list. • New Cross to Forest Hill Railway needs to be included as a proposed MOL as it fits the criteria and is threatened in several places. • Buckthorne Cutting needs to be added as proposed LIG • Buckthorne Cutting needs to be added as proposed Area of Special Local Character 	<p>Noted. When adopted, the Neighbourhood Plan will form part of the development plan and sits alongside Lewisham's local plan. Decisions on planning applications will be made using both the local plan and the neighbourhood plan, and any other material considerations. Therefore, there is no need to repeat designations such as Local Green Space covered in the neighbourhood plan on the policies map for the Lewisham Local Plan .</p> <p>Following Regulation 18 Consultation, an Open Space Review and MOL Review Update (assessing additional sites for MOL designation) has been prepared to inform robust protections for open and green space within a clear hierarchy.</p> <p>In line with the Revised Site Assessments for London's Foundations (2021) report, the Regulation 19 document will include LIGS at Buckthorne Cutting and Old Gravel Pit, Blackheath.</p>	<p>Open Space policy amended to clarify that Local Green Space has the same level of protection as Metropolitan Open Land and Green Belt.</p> <p>In accordance with the Open Space Review and MOL Review Update, designations for following sites are:</p> <p>Forest Hill to New Cross Railway Cutting: Metropolitan Open Land</p> <p>Duncombe Hill Green: Strategic Open Space</p> <p>Ewart Road Green/Grove Close Green: Strategic Open Space</p> <p>Crofton Park Railway Garden: Strategic Open Space.</p> <p>Schedule 7 amended to reflect Buckthorne Cutting.</p>

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

			developed so as to enable this network to achieve its aims for nature's recovery, locally, regionally, and nationally.		
London Wildlife Trust	2	GR	<p>B. Local Plan Evidence base: Sites of Importance for Nature Conservation</p> <p>We note the report of the SINC review produced by The Ecology Consultancy (2016).¹ There are a few minor errors and missing information, partly due to the elapse of time, that we suggest are amended.</p> <p>Appendix 4: Updated and new citations</p> <p>Site M069 <i>Blackheath and Greenwich Park</i></p> <ul style="list-style-type: none"> Site ownership (of part) refers to London Borough of Greenwich; it is now Royal Borough of Greenwich <p>Site M122 <i>Forest Hill to New Cross Gate Railway Cutting</i></p> <ul style="list-style-type: none"> Last para. A new nature reserve, Buckthorne Cutting, has been established , within the SINC, north of Garthorne Road NR, since the last survey. It also refers to “Brockley Nature Reserve” as managed by the London Wildlife Trust”; the site we manage is called New Cross Gate Cutting² (the Brockley name was a temporary change, dropped over 12 years ago). The four nature reserves currently don't afford additional protection to the SINC, but their positive management helps to maintain as best possible the SINC's condition within their respective boundaries. We support the proposals for more – if not all - of this important corridor to be managed and protected as such. <p>Site M135 <i>Beckenham Place Park (LNR)</i></p> <ul style="list-style-type: none"> The proposed extension is outside of the statutory Local Nature Reserve. We suggest that (LNR) is removed from the SINC title, and clarity made in the citation as to the alignment of the LNR to the extension, unless the Council is intending to designate the expanded SINC as a LNR (see below). <p>LeB03 <i>Downham Woodland Walk (LNR)</i></p> <ul style="list-style-type: none"> Ditto in respect of the LNR, and as private land as indicated the extension is unlikely to become designated as such. <p>LeL16 <i>Eliot Bank Hedge and Tarleton Gardens</i></p> <p>Ownership referenced in the initial information is The Dulwich Estate (singular), and there's hesitancy in the final para about ownership, which should be clarified.</p>	Noted. As the plan is progressed through the next stages of the process, the Council may take the opportunity to update these citations, subject to resources available.	Schedules in the Plan revised to remove Local Nature Reserve from the site name of SINC's and to include schedule of designated Local Nature Reserves.
London Wildlife Trust	2	GR	A number of other SINC's have had (LNR) added into the name as a proposed amendment; six in total. This is set out in the main SINC Report (section 4.8): “ <i>It is proposed to rename seven existing SINC's to better reflect the habitats present</i> ”, but for the rest it is “ <i>To include the statutory designated site within name.</i> ”	Noted. Although the SINC citations do not reference additional land designations, this will be clear from the planning policies map that has been prepared alongside the Regulation 19 Local Plan, which sets out land-use designations and their spatial extent.	No change.

			We suggest this is removed in all cases (i.e. not adopted), as it is unnecessary and potentially misleading, especially if boundaries differ. SINC's are a non-statutory designation, based on their intrinsic biodiversity quality, no matter ownership or land-use, whereas a Local Nature Reserve status is based on land-use and that the local authority has a legal interest in the land. Whilst many LNR boundaries align with SINC's, the majority don't (they are often smaller). The SINC citations should reference the additional land designations that it may be subject to in part or full (e.g. MOL, Conservation Area, Historic Park & Garden, LNR, etc.).		
London Wildlife Trust	2	GR	Just to be clear, we support the declaration of sites as Local Nature Reserves if they are of high quality and can be managed as such (and those listed here are). But we feel it is important to distinguish SINC's from their other designations (several SINC's in London are also designated as SSSIs) in a Local Plan.	Noted.	Schedules in the Plan revised to remove Local Nature Reserve from the site name of SINC's and to include schedule of designated Local Nature Reserves.
Make Lee Green	2	GR	<p>Action on Green Space</p> <p>The Plan identifies the importance of green space for health and wellbeing. We agree that access to nature and shared open space should be a priority for this Plan.</p> <ul style="list-style-type: none"> - New green space should be a mandatory requirement for any new development. The redevelopment of the Kidbrooke estate is a good example of how green space can significantly enhance new residential areas. - The Council should consider rewilding of existing green space and rivers to enhance biodiversity. - Community applications for street tree planting should be prioritised over car parking. 	<p>Noted. The draft Local Plan sets requirements for development proposals to provide for new or enhance existing open spaces, including in areas of identified deficiency. It also proposes that major development proposals meet the target Urban Greening Factor, in line with the London Plan.</p> <p>However it would be unreasonable to expect all development proposals to provide new green space (for example, proposals for shopfront signage and conversion of buildings).</p> <p>Part 2 Policy CI3 require developers to seek to increase opportunities for play and informal recreation, particularly in areas where there are identified deficiencies in provision.</p> <p>The Local Plan seeks that development proposals seek to naturalise existing or new green spaces. The Parks and Open Spaces Strategy also includes priorities around naturalisation, and will provide for enhancements which may not necessarily be delivered by new development.</p> <p>Tree planting in the public realm, whilst broadly supported, must not have an adverse impact on the highway network, including parking provision. A balanced approach will need to be taken, with impacts considered on a site by site basis.</p>	No change.
	2	GR	5. The green space to the north of Eltham Road (behind the fire station and onward) could be created as permanent park land	Noted.	Local Plan amended to clarify the

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

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

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

			<p>The Mayor of London aims through a whole raft of policies to improve London’s natural capital including by making London a National Park City. In practice this means making our neighbourhoods greener and wilder, carbon positive, more active and more social by significantly reducing and simplistically put the private cars taking up public spaces. DNA supports this greener and wilder, more active, resilient and affordable London with all the health and wellbeing benefits that are created while flood risks, as well as the acute climate and ecological emergencies are tackled.</p> <p><i>“A green infrastructure approach requires a re-imagining of the public realm to consider how these places can make London greener, healthier and more resilient. Creative design solutions can allow even the more formal aspects of public space to be stitched into the wider ecological network of the city.” Urban Greening for Biodiversity Net Gain: A Design Guide, Mayor of London , 2021</i></p> <p>DNA also recognises a disconnect between the identified multiple deficiencies in almost all categories of open and green space types in LBL’s Parks and Open Space Strategy 2020 for the Neighbourhood Plan area, the projected population growth through already consented planning applications pre 2016 and lack of an up to date needs assessment of a full range of social infrastructure needs, including green spaces for the incoming population.</p> <p>Evelyn ward has already the highest population density in the borough, currently estimated at 12,607 people per square kilometer. In addition, detailed requirements set out in the London Plan 2021 and the Mayor’s Homes for Londoners: Affordable Homes Programme 2021-2026 Funding Guidance have set higher standards, much higher than those reached in the already consented development. It is therefore reasonable that the increase in population will further increase the multiple deficiencies in access to public green and open spaces, measured in sqm per person and distance, as these are finite. Delivering and focusing the new standards on-site predominately for the benefit and use of the residents on that specific site is in our view an approach which does not reach optimal outcomes for the neighbourhood as a whole.</p> <p>Ground level publicly accessible land is finite, hence the need for a coordinated approach making the best use of land is DNA’s response to the given context. Policies aim to improve the quality of existing green and open spaces, maximise their health and well-being potential, their accessibility, including a greater focus on making streets and public spaces more attractive for pedestrians and cyclists and greener. This will assist in allowing the current and thousands of new residents and employees to make more healthy choices. Walking and cycling will also reduce traffic which as we know will improve poor air-quality – which has a negative compounding impact on health and wellbeing for whole population, especially children and youths and elderly. 64,000 people die every year as a result of air pollution, and now we have the [text removed]</p>	<p>sustainable development set out in the National Planning Policy Framework. It directly addresses topics referred in the representation, such as green infrastructure, carbon minimisation and neutrality, modal shift to sustainable travel modes, etc. Part 3 of the Local Plan sets out further sub-area specific spatial strategies and policies to support the delivery of the Local Plan, with a key focus on environmental and public realm improvements in the Deptford area.</p> <p>The Council has commissioned evidence base studies to inform the draft Local Plan, including Open Space Assessment, along with other key strategies such as Parks and Open Spaces and Playing Pitch Strategy. It considers that these studies are robust.</p> <p>Part 4 of the Local Plan addresses delivery, including funding via Planning Contributions and Community Infrastructure Levy. The Local Plan makes clear throughout that where planning obligations are necessary, these should be delivered on-site as a priority, however flexibility is provided to allow for pooled contributions to be re-invested in the local area. S106 agreements are required by law to be directly related to the impacts of a development proposals.</p> <p>The Council is also seeking to use CIL to support the delivery of infrastructure required to support the levels of growth planned over the long-term, and governance arrangements for Neighbourhood CIL have been adopted.</p>	
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			<p>test case – urgent action improving the quality of air across the Borough and especially in parts of Deptford such as around Deptford Church Street, New Cross Road and Evelyn Street within the Dna Neighbourhood Plan Area.</p> <p>Positively planning for better links in the future via Convoys Wharf, the River Thames and Deptford high street, the expanding Cultural Quarter on Creekside and public transport hubs will support many of the Deptford Plan objectives if not all, directly and indirectly. The Deptford Green Links Policy (Map) addresses the need for better greener and open spaces, attractive, biodiverse and child friendly walking and cycling connections between major destinations. Deptford Links is a spatial framework for a network of public greened walking and cycle routes through the neighbourhood plan area and beyond. It builds on Lewisham’s Parks and Open Spaces Strategy and the North Lewisham Links, Air Quality Management Areas and supports initiatives such as School Superzones and ‘Daily Mile Initiatives’. Deptford Green Links provides a spatial priority framework to deliver better access to and between key destinations, having regard to consented and planned strategic development.</p> <p>Our approach, especially the policy initiatives for the Deptford Green Links Network and Health and Wellbeing Hub Zones provides a neighbourhood wide restorative spatial strategy to green and social infrastructure investment in public spaces. encouraging ‘off-site in-neighbourhood’ provision and pooling of planning requirements such as urban greening factor and biodiversity net gain, part of the play space provisions, sustainable urban drainage and to a lesser degree carbon offset units. This approach recognises the high levels of deprivation endured by the current population in the neighbourhood plan area and the already consented development resulting in an estimated 12000 to 15000 new residents over the next decade in the context of the acute climate, ecological and public finance emergencies.</p> <p>We ask the Council to support an ‘off-site but ring-fenced neighbourhood’ policy application to pooling of development related green infrastructure and carbon related planning requirements normally provided on-site.</p> <p>Also see UN Habitat report on need for cities to Green Up post Covid and increase biodiversity: https://news.un.org/en/story/2021/03/1088622</p>		
Grove Park Neighbourhood Forum	2	GR 01	<p>This policy should make a stronger link between GI and ecological corridors and nature recovery networks, so it also aligns to law and national policy.</p>	<p>Noted. Part 2 policies on Green Infrastructure recognise and seek to enhance the connected network of green infrastructure, including biodiversity sites. These are considered to be consistent with national and regional planning policy. However it is accepted that a reference to nature recovery could strengthen the strategic approach.</p>	<p>Local Plan policy GR3 amended to set out Council’s commitment to prepare a Local Nature Recovery Strategy.</p>

Grove Park Neighbourhood Forum	2	GR 01	This policy should emphasise that all development should contribute towards Lewisham's green grid, and a stronger emphasis on creating connections to enhance Lewisham's green grid.	Noted. Part 2 policies on Green Infrastructure recognise and seek to enhance the connected network of green infrastructure, including biodiversity sites. These are considered to be consistent with national and regional planning policy.	No change.
Grove Park Neighbourhood Forum	2	GR 01	Local links should also be mapped and celebrated, e.g. the Brockley Three Peaks trails and Quaggy River Links.	Noted.	Each sub area now includes a Lewisham Links Map which incorporates strategic green links, walking and cycling routes.
Grove Park Neighbourhood Forum	2	GR 01	How does the south east London Green Chain Walk fit in? This should also be mapped, to show the potential for making additional links into it.	<p>The South East London Green Chain is a strategic green infrastructure network, and forms part of the Green Grid, identified in the Lewisham Local Plan and mapped in Fig 10.1.</p> <p>The South East London Green Chain will also be included on the planning policies map to accompany the regulation 19 version of the Plan.</p> <p>Policy GR2 requires development proposals to give priority to measures that will encourage walking, cycling and other active travel modes along routes that link open spaces such as the South East London Green Chain.</p>	No change.
Hopcroft Neighbourhood Forum	2	GR 01	<p>Policy GR1 – green infrastructure:</p> <ul style="list-style-type: none"> • Should make a stronger link between GI and ecological corridors and nature recovery networks, so it also aligns to law and national policy. • This policy should emphasise that all development should contribute towards Lewisham's green grid, and a stronger emphasis on creating connections to enhance Lewisham's green grid. • Fig 10.1 – Green Grid Framework. All GI should appear green including parks. Why only show the central spine as a strategic corridor? The Forest Hill to New Cross and South Circular to Chinbrook Meadows are also strategic green links and should be highlighted. • Local links should also be mapped and celebrated, e.g. Brockley Three Peaks trail. • How does the south east London Green Chain Walk fit in? This should also be mapped, to show the potential for making additional links into it. 	<p>Noted. Policies relating to ecological corridors are addressed under Biodiversity and Access to Nature.</p> <p>The Green Grid Framework map has been informed by the Mayor of London All London Green Grid (ALGG) Framework Supplementary Planning Guidance (SPG), and Lewisham features as ALGG Framework Area 6 – South East London Green Chain Plus.</p> <p>This SPG describes the importance of green infrastructure being delivered at a strategic sub-regional level and identifies strategic corridors and strategic links at a strategic sub-regional level.</p> <p>Strategic corridors and strategic links in the Green Grid Framework reflect those identified in the SPG mentioned above. Other green spaces have been coloured grey in order to emphasize the South East London Green Chain Plus Grid.</p> <p>Strategic green links at a local level, including Forest Hill to New Cross and South Circular to Chinbrook Park, have been</p>	Figure 10.1 revised to include the South East London Green Chain Walk.

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

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

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

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

		<p>There is no mention of educational opportunities provision within open space. The decking platforms at Cornmill Gardens were meant to serve Lewisham Bridge school but not enough teachers utilised the resource and there was no pressure as a result for upkeep. The Field Studies Council now has a successful non residential base in the Homesteads in Beckenham Place Park which will increase use and stewardship amongst the young. Any development should put funds aside to create a maintained ‘outdoor classroom’ in a local park or in its own landscape near points of interest (river etc.) for the use of local schools, scout groups etc. A simple ‘outdoor classroom’ which can accommodate a class or group of children can instil a respect for nature in the next generation.</p> <p>There is no mention of increasing personal safety by Designing Out Crime in new open spaces. Cornmill Gardens and the Northern part of Ladywell Fields were transformed (via the QUERCUS project) with EU Life funding, one of the main criteria of change being Designing out Crime to encourage more use. It is widely acknowledged to have succeeded. QUERCUS produced a toolkit which should be referred to. Lewisham was the lead agency in it and earned a lot of respect. BDP designed Cornmill Gardens won the London Best New Public Space Award in 2009.</p> <p>There is no mention of art opportunities (specified on P103) either. There is a silver sculpture in the Ravensbourne in the Catford section which was a surprise to QWAG, Lewisham Biodiversity Partnership and the Environment Agency (as it had the potential to increase flood risk). There was no funding for maintenance so Glendale or volunteers had to clear the debris).</p> <p>10.6 ‘Open Space’ can be hard standing as QWAG argued against in SRB6/Urban Renaissance in Lewisham/NewLewisham where St Stephen’s Square had lollipop non-native trees amongst the extensive paving. The hard standing in the Catford end of Ladywell Fields was specifically designed as a Catford Market/Event Space (but organisers prefer the remoter Ladywell end as toilets are present (refer to para 5.25 P105). New developments should include (funded) maintained and fully accessible toilet facilities added to local parks to serve the new residents and others (the plumbing integrating into that of the newbuild. It should have happened in Barratt’s Catford Green development that charges a premium for private flats overlooking a park they did nothing to improve.</p> <p>In providing for sports (and as result fitness) there is a danger that open green spaces become ‘sportified’. The Arena in Ladywell Fields is now not wholly public accessible in what was open green space. Banatynes in Grove Park (Borough Boundary</p>	<p>Sites with planning consent are outside the scope of the Local Plan.</p>	
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			<p>was moved from the Quaggy river to be included in more laissez-faire Bromley where no-one would object (Lewisham residents in Grove Park were sidelined albeit traffic increased and no cycle parking included - for 'fit' people!). See map on P360 for notch.</p> <p>The page has another image of Ladywell Fields from the Catford corner, still missing out the river that people gaze at and enjoy.</p> <p>P361</p> <p>10.7 There is an art levy (CIL or S106?) for big developments I believe and I have seen proposals for 'audio sculptures' outside the main police station to 'listen to' the Quaggy below the Lewisham High St high pavement. Once again LBP or QWAG have not been consulted and we would advise these should be functional arty structures (such as grills or glass blocks) to allow air/light into the dark tunnel to facilitate birds' migration and educate the public as to the existence of the lost river beneath. No doubt they shall suddenly appear as thousands of pounds are wasted on a lost opportunity. QWAG have it in mind to improve the public realm by 'daylighting' the Quaggy there anyway using S106 monies from the original SRB6 funding to improve the functionality and amenity of that deficient area. The new Confluence Park is a success at the moment but will soon be overshadowed by the next phases of development. It is a great improvement on the (award winning in less aware days) amphitheatre like Quaggy Gardens and is appreciated by the new local residents.</p> <p>10.8 No doubt this is referring to the rearrangement of MOL in NewLewisham to replace the driven over Charlottenberg Gardens with the Confluence Park. The former was a green desert that was formerly a Safeway, stored the Chiesmans' Bridge and was an ugly hoarding site until [name removed] got it grassed over and it unwittingly became designated as MOL (I remember that). The danger is that the developers have engaged a security and maintenance company to keep it looking pretty (despite that I have personally removed graffiti and substantial litter from the river and banks - see Love Clean Streets as I am a 'Streetleader no 749') and it is not technically accessible 24/7 to the public. Muse's refusal to provide a bridge across the confluence showed they were not interested in providing an alternative more pleasant route out of the station towards Lee as commuter/user numbers inevitably increase.</p> <p>10:9 The second sentence re the ALGG should end with 'supporting sustainable communities of humans and wildlife'! (The ALGG specifies 'for the benefit of people and wildlife').</p>		
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			<p>10:10 Re the acronym NPPF please add 'See P17'. As some people do not read from the beginning. Which has more protection? Green Belt, Local Green Space or MOL with respect to development issues in Grove Park or Duncombe Hill Green?</p> <p>P363 The image of BPP and the restored lake just missed the tiny river (tributary to the Ravensbourne) feeding the lake.</p>		
	2 2	GR 02 Figure 10.2	The open space map within the document fails to show which open spaces are protected as MOL, Green Chain or SINC designations. The map is therefore pretty inadequate and meaningless unless the Draft Proposals clearly affirm that the existing map and land designations remain in force.	Noted.	A Policies Map has been prepared and sits alongside the Regulation 19 Local Plan document. This clearly sets out land-use designations and their spatial extent.
Blackheath Society no 2	2	GR 02	GR2 Open spaces and Lewisham's green grid. We support the policy of protecting open space from inappropriate development and resisting its loss. It should be made clear in the policy that open space with hard surfaces is not of equal environmental value and public benefit to open green spaces (including water), and that provision and maintenance of trees will add further value to open space. We support any attempts to increase open space in areas of deficiency, especially green space.	Noted.	Local Plan amended to clarify the different typologies of open space within an open space hierarchy and the level of protection afforded to each. This include clarification between green open spaces and other open spaces (e.g. hardstanding but part of public realm).
Climate Action Lewisham	2	GR 02	Additionally, policy GR2A Page 357(A) references "inappropriate" developments but fails to define what that means in this instance. Such loose wording will undoubtedly be exploited and must be rewritten to account for loopholes and misappropriation.	Agreed.	Local Plan Policy GR2 amended to provide more clarity around inappropriate development.
Climate Action Lewisham	2	GR 02	We welcome policy GR2H Neighbourhood forums and their contributions in identifying 'appropriate sites to designate as Local Green Space in neighbourhood development plans'. However, page 361(10.10) states that 'It is recommended that	Noted. The Council has a statutory duty to support neighbourhood forums, and the nature of this support is explained further in the Government's National Planning Practice Guidance. For open space, the Council may assist in	No change.

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

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

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

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

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

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

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

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

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

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

		<p>c. Demonstrable improvements in open space provision will be achieved, particularly in addressing identified deficiencies in the quality and quantity of open space in the locality and public accessibility to it;...”</p> <p>E “Development proposals for ancillary uses on open space (such as outdoor leisure facilities, outdoor play and fitness equipment, refreshment facilities, event space and public toilets) that help to improve the quality of open space and promote access to a wide range of users will be supported where they:</p> <p>a. Are demonstrably ancillary to the use of land as open space;</p> <p>b. Are necessary to facilitate or support the appropriate use of the open space;</p> <p>c. Do not have a detrimental impact on the environmental function of the open space, including support for nature conservation;</p> <p>d. Respond positively to local character, including by maintaining or enhancing the visual quality of the open space and its setting;</p> <p>e. Are of a scale and function that is proportionate to the nature of the open space; and</p> <p>f. Are designed to a high quality standard, are accessible and inclusive to all, and do not detract from the amenity provided by the open space.</p> <p>F “Development proposals will be expected to maintain and enhance Lewisham’s network of open spaces, including by improving access to and connectivity between these spaces. Priority should be given to measures that encourage walking, cycling and other active travel modes along routes that link open spaces such as the South East London Green Chain, Waterlink Way, the Thames Path and other local elements of the All London Green Grid.</p> <p>G “Development proposals located adjacent to open space should respond positively to the character of the open space and seek to protect and enhance the habitat value and visual amenity provided by it.”</p> <p>H “Neighbourhood forums are encouraged to undertake detailed assessments to identify appropriate sites to designate as Local Green Space in neighbourhood development plans.”</p> <p>How will the Plan assess the environmental function of spaces (see D b, E c)?</p> <p>The Plan has already been negative about the prospects to create more green space so it is not clear how the comments in this section (F) about improved linkages between spaces will be realised?</p> <p>What will be locally distinctive about the Plan in this section?</p> <p>For instance, will particular ecological features and habitats be prioritised to support local distinctive character and role in meeting other aims such as local civic pride, education and learning?</p>	<p>Proposals for development with a potential to impact on the nature conservation value of sites will be required to submit an up-to-date Ecological Assessment prepared by a suitably qualified ecologist. Furthermore, where appropriate development proposals, will be required to submit a Landscape Design Strategy and Arboriculture Survey to demonstrate that landscaping and other urban greening measures are appropriate to the site, can be implemented effectively and suitably managed over the lifetime of the development</p> <p>This is how the environmental function of open spaces will be assessed.</p>	
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South East London Labour for a Green New Deal	2	GR 02	<p>It is not enough to prioritise open spaces. We must ensure all parks and open spaces are organic, wildlife and climate friendly. For example, neither the council or their private contractors will use pesticides or any peat products. Open spaces should include plants that support insect and birdlife. This has to be led by Lewisham level and not left to park user groups. Many open spaces could support wildlife gardens or small reserves of type found on Peckham Rye, Greenwich Peninsular Ecology Park or the Centre for Wildlife gardening in Peckham; managed by local organisations they would also act as educational resources. Community gardens can also be developed on existing council estates.</p>	<p>Noted. The management of parks and open spaces, including maintenance arrangements, are outside the scope of the Local Plan.</p> <p>The Council's adopted Parks and Open Spaces Strategy sets out priorities for managing and improving these spaces.</p>	No change.
Telegraph Hill Society	2	GR 02	<p>Policy GR2 requires developers to provide "<i>open space</i>" however this can still result in the loss of green space as the two are not synonymous as explained above. GR2 requires redrafting such that the policy preserves or increases both open space AND green space and resists the loss of open space, including green space.</p>	<p>Noted. Draft Local Plan policy GR2.A sets out the basis for protecting open spaces from inappropriate development. This criterion will need to be considered in conjunction with other elements of the policy which set the basis for development proposals to make provision for new open space.</p>	No change.
Telegraph Hill Society	2	GR 02	<p>Policy GR2.B refers to "<i>development proposals, particularly those located within areas that are deficient in open space</i>". The scale of new developments, particularly in those areas where tall buildings are deemed suitable, require additional considerations to ensure that these areas do not become more deficient in green space. To put it bluntly, adding, for example, 2 acres of new green space for 1,000 new homes is likely to reduce the amenity as shared by all new and existing residents of the area even though it is on the face of it an increase in green space. The Council's policy should ensure that, in any local area, a new development does not result in a significant reduction of green space per person and should establish a base-line of minimum acceptable green space per person as a</p>	<p>Noted. The Lewisham Open Spaces Assessment (2019) considers the amount of open space that is needed to support the projected future population over the plan period, based on a fixed quantity standard. This suggests that a significant amount of additional provision will be required to maintain the standard over the long-term. Due to the finite availability of land and pressure to accommodate new development, such as for housing and workspace, it will be a significant challenge to maintain the standard as the population grows.</p> <p>In light of this, the draft Local Plan approach is to ensure that existing open spaces are protected, measures are</p>	No change.

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

			<p>Local Green Space - the Buckthorne Cutting meets the criteria Is in close proximity to the community it serves</p> <ul style="list-style-type: none"> • It is within a 5 minute walk of 2 local schools, a nursery, a church and within 2 minutes walk of Crofton Park high street, bars, cafes and shops. <p>It is special to the local community and holds particular significance</p> <ul style="list-style-type: none"> • Section A was one of the UK's earliest scouting grounds for almost 100 years achieving Asset of Community Value in 2018. The scouts want to return to their club and have done since they were evicted by the landowner in 2004. • It has a community park in the middle with a pocket garden and murals created by the community. • Section B has a community garden and a nature reserve that runs forest clubs servicing 5 local schools. • Sections A and B are rich in wildlife including endangered species and is home to rescued wildlife including rehabilitated birds of prey. • The cutting is part of a Metropolitan Site of Importance for Nature Conservation and is in the process of being designated by the London GeoPartnership as a Locally Important Geological Site (Borough wide importance) It is local in character and not an extensive tract of land • forms part of what was the historic Brockley Green • provides a canopy of trees over the high street and the iconic buildings of St.Hilda's, the Brockley Jack and the Rivoli Ballroom • Has very close connection with local community spanning centuries and to the current day hosting open days and community driven events including talks from the Great North Wood and history walks from the local historians. • Has a reed bed as remnant of the Croydon Canal • It covers the length of one short road so is not extensive 		<p>Open Land Review Additional Sites Report, Buckthorne Cutting including the Old Scout's Hut has been designated as proposed Metropolitan Open Land.</p>
The Fourth Reserve	2	GR 02	<p>Metropolitan Open Land - Forest Hill to New Cross Railway Cutting meets the criteria it contributes to the physical structure of London by being clearly distinguishable from the built-up area</p> <ul style="list-style-type: none"> • The railway cutting forms a metropolitan SINC (M112) and is clearly distinguishable from the built-up area It is a significantly important ecological corridor forming a key part of the physical structure of London. • Forms an impressive natural landscape in an urban context, rare in London. • Excellent example of a green infrastructure-dominated public transport transit route to rival any other in Europe. These routes offer a best practice guide on how its design is not just a 	Noted.	<p>In accordance with the Metropolitan Open Land Review Additional Sites Report, Forest Hill to New Cross Railway Cutting has been designated as proposed Metropolitan Open Land.</p> <p>In accordance with the Revised Site</p>

		<p>transit infrastructure route, but an integrated green-infrastructure route to provide wider benefits of sustainable transport. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London</p> <ul style="list-style-type: none"> • the cutting has four accessible Nature Reserves along its stretch. • In 2017 the north end of the cutting (New Cross Nature Reserve) was added onto the list of Sites of Geological Interest http://londongeopartnership.org.uk/wp/wp-content/uploads/2018/08/Guidecitations-for-SGIs-2017.pdf. Recent geological findings in the middle part of the cutting, at Buckthorne Cutting Nature Reserve will designate this part an LIG also. • The corridor offers a number of open-air facilities, including the allotment and the 4 nature reserve sites which open regularly to the general public. it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value • Unique historical context and landscape features. • As well as serving as a local natural heritage asset it also has metropolitan value, and arguably national value as well. The middle sections has links to the early scout movement, to the international peace movement of the 1800s and women's UK peace movement. • It is a rare example of a well-designed public transport corridor that supports different activities, and has the additional interest of its significant engineering history with the Croydon Canal. • It has both a natural heritage value and an intangible cultural heritage value. <p>it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.</p> <ul style="list-style-type: none"> • It forms a very important part of the wider green infrastructure of Lewisham and London as a whole. • It forms an intrinsic part of the All London Green Grid. • The corridor is located within Area 6 - South East London Green Chain Plus. • It is adjacent to Section 11 – Crystal Palace Park to Nunhead Cemetery of the existing SE London Green Chain. This part of the GCW was opened in 2006 and goes through Camberwell New 		<p>Assessments for London's Foundations, Buckthorne Cutting has been designated as a Locally Important Geological Site.</p>
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			<p>Cemetery on the other side of the railway tracks. However, there is immense potential to extend the walk to incorporate the M112 green corridor.</p> <ul style="list-style-type: none"> • It is also on the route of the Locally defined Brockley Three Peaks Green Walk. <p>We ask that the Local Plan process is used to finally mark the importance of this site in order to preserve and protect it and to help inform the council and planners with any future considerations relating to this area.</p>		
The St John's Society	2	GR 02	<p>Linking of green spaces – how is this proposed to occur when much/all/any free space might and probably will be given over to new housing? The Lewisham Links should be expanded as a priority.</p>	Figure 3.9: Borough-wide spatial Strategy Plan demonstrates the linking of green spaces through Lewisham Links can be delivered alongside the provision of new housing.	No change.
Transport for London	2	GR 02	<p>We seek clarification as to whether BLE construction works would be an acceptable form of (temporary) development in line with this policy GR2.</p>	Noted. Temporary uses will be considered through the Development Management process. The Local Plan broadly seeks to secure the delivery of the BLE.	No change.
	2	GR 03	<p>I would like the Lewisham Local Plan to recognise the value of the nature reserve [Buckthorne Cutting Nature Reserve] and the private land to the local community and to biodiversity by listing it as a Local Green Space at the very least. The whole railway corridor has 4 nature reserve and an allotment visited regularly by the public and I believe that to recognise this and to show the council how important it is the whole corridor could be considered as Metropolitan Open Land.</p> <p>As a volunteer I have heard a lot about the history of the site from its time as Brockley Green and the history of the scout movement. This also needs to be recognised by Lewisham Council as part of the Local Plan. It is probably one of the oldest sections of the Great North Wood and I can't understand why you have not included it in your maps at all.</p>	Noted.	In accordance with the Metropolitan Open land Review Additional Sites Report, Buckthorne Cutting as well as the Forest Hill to New Cross Railway Cutting has been designated as proposed Metropolitan Open Land, which has the same level of protection as Green Belt.
	2	GR 03	<p>I'm emailing about the wild green area at the back of Adamsrill Road that has been earmarked by a luxury development company for limited, high price housing.</p> <p>I live on Adamsrill Road and I love that green area - it was a big part of the reason why I chose to move here 5 years ago, so I could be closer to nature. I'd like to ask that the area be protected and put to use as a green space/forest/nature reserve for the community. It would be wonderful to see</p>	Noted. The disused allotment to rear 53 of Adamsrill Road will be protected under a non-designated open space policy in the regulation 19 Plan.	Local Plan amended to clarify the different typologies of open space within an open space hierarchy and the level of

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

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

			<p>ecological succession. No recreation of that or any destroyed habitat will ever be an improvement for biodiversity and be sustainable. It is not just trees, it is the soil microbiota that is fragile and is part of the ecological community. As Lewisham has declared a Climate Emergency then it should allow those trees to grow undisturbed and soak up that carbon. The officers and councillors have actually done a good (and risky) job defending these sites over the years (Willow Tree stables being the other one), thanks.</p> <p>10.13 Education is finally mentioned and I referred to it earlier. Access to Nature includes volunteering and local stakeholder participation who benefit also by exercise socialising, mental health and team working (such as Friends of Brockley and Ladywell Cemeteries' workdays, Nature's Gym and 3 Rivers Clean Up projects). Desktop based members employ and develop mental agility in admin roles including campaigning and responding to these consultations!! These challenges can stave off dementia and maybe Alzheimer's.</p> <p>QWAG, Amenity Groups and Park User Groups (inc FoBLC) should be specified as partners to help Lewisham as resources are stretched and staff overworked. Local groups promote bat walks, bird feeders and boxes etc.,. keep an eye on Planning Applications and some even contribute directly to GiGL. They should not be seen as constraints or interfering. Lewisham Biodiversity Partnership is one of the most respected, able and functioning in England, mostly because of its efficient staff. Greenwich has no equivalent and its biodiversity suffers.</p> <p>10:14 Good. Lewisham has one of the best records for Living Roofs around thanks to (Name Redacted) et al. As a disciple of (Name redacted) I promoted them in my term on Planning Committee B as a Councillor for Ladywell 2006-10 and was seen as a joke. Now we are one of the lead boroughs!</p> <p>10.15 Surveys should be carried out at the optimal time. A few years ago the developers for Willow Tree stables 'Ecologist' surveyed in middle of winter to find not a lot! Lewisham's Tesco car park is being cleared of vegetation right now to avoid the bird nesting season ready for the Meyer Homes development with the tallest residential block in South London which overlooks the original designated peak in Muse's NewLewisham project.</p> <p>10.16 Lewisham cannot be seen in isolation. If my proposal for converging wildlife corridors feeding into to a Thames Green Bridge and disseminating corridors northwards were to be taken up by London then we would have a true, functioning and unique London National Park City</p>		
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			<p>10.17 Site Management Plans are incredibly important and ongoing costs should be factored into the S106/CIL so that the management can be efficiently done by staff and/or volunteers. I have only ever seen myself litter pick in the river in Confluence Park, volunteering colleagues litter picked recently in Cornmill Garden's riparian banks, thankfully Glendale staff were happy to help disposing of the arisings. L&Q very very occasionally have a staff cohesion day doing the same although there is a levy on the rents to pay for the upkeep. LIDL in Lee High Road occasionally clear their customers' (and others') flytipping over the wall into the river bank. These situations must be monitored (e.g. in LIDL's case cameras in car parks) and regular management events set up, volunteers would be happy to help (as they do in the 3Rivers Clean Up events normally).</p> <p>P370 The map has interesting extensions and additions. Grow Mayow does lots for bees! Good to see Lewisham Park included although needs more wildlife friendly management.</p> <p>P371 There is an interesting deficient area straddling New Cross Gate to Brockley MOL although there is Vesta Road/Brockley/New Cross Gate Cutting Nature Reserve there, albeit only open rarely. Adjacent houses overlook the peaceful scene though.</p> <p>P372 The image is of Cornmill Gdns yet again with no river! Have you not got better own copyrighted library images? CG is a favourite, granted, as award winning and top priority for litter picking and maintenance as it is so central and observable from passing trains so setting a good example to be in Lewisham. Decayed decking and being a drinkers' haunt with associated litter has let it down though as Glendale cannot cope. Get a picture from the bridge of the steps (but clear the litter first).</p>		
	2	GR 03	<p>This email is intended to highlight my family support in keeping green spaces such as the Buckthorne Cutting Nature Reserve.</p> <p>We love living in Lewisham and wouldn't want to leave London but if special places like this which are the last sanctuaries for wildlife in our neighbourhoods is taken away then that would be heart-breaking and detract from living in the area.</p> <p>Additionally, the Scouts house on Coutrai road has been locked up for years. What a waste! Could be used for such great green space for our children.</p>	Noted.	In accordance with the Metropolitan Open land Review Additional Sites Report, Buckthorne Cutting, including the Old Scouts Hut, has been designated as proposed Metropolitan Open Land, which has the

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

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

					ecological corridors.
Grove Park Neighbourhood Forum	2	GR 03	The policy mentions 'sites with special biodiversity interests' Which are these sites? The SINC review doesn't have such a classification, it has local, borough and metropolitan sites of importance for nature conservation.	Noted.	Policy GR3 amended to provide more clarification on other sites with special biodiversity interest.
Grove Park Neighbourhood Forum	2	GR 03	Fig 10.7 designated nature conservation sites should include the Sydenham cottage extension area as per neighbourhood plan (not clear if it does due to scale)	Noted.	In accordance with the Open Space Review, the boundary Sydenham Cottage SINC has been revised to include two additional areas consisting of a native hedgerow along Alice Thompson Close to the west of the SINC and an area of woodland bordering the River Quaggy to the north.
Hopcroft Neighbourhood Forum	2	GR 03	There is a reference to designation of Sites of Importance for Biodiversity but this designation is not clear/explained.	Noted	Policy GR3 amended to provide more clarification on other sites with special biodiversity interest.
Hopcroft Neighbourhood Forum	2	GR 03	<ul style="list-style-type: none"> The NPPF states that local authorities should map out ecological corridors. Which map does this? The policy mentions 'sites with special biodiversity interests'. Which are these sites? Fig 10.7 designated nature conservation sites should include the Sydenham cottage proposed new as per neighbourhood plan (not clear if it does due to scale) 	Noted.	Figure 10.7 revised to include strategic habitat corridors identified in the Lewisham Re-Survey of SINC Study (2016) as the borough's ecological corridors

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

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

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

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

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

			<p>10.23 The huge standards (from Germany as no British suppliers at the time) ordered for Cornmill Garden and Ladywell Fields in the (EU Life funded) QUERCUS project were expensive but ultimately sustainable.</p> <p>10.24 Local native provenance trees should be sought, although with Global Warming maybe examples selected and raised in the south might fare better. This is a complicated subject. Hopefully British nurseries are growing on larger native trees as demand rises. The Right Tree Right Place approach should also take into account wildflower meadow and aquatic habitats. Ladywell Fields and Cornmill Gardens have substantial populations of self seeded/lodged crack willow.</p> <p>10.25 Reduced Council staff in this department are hard pressed to enforce breaches across the borough. Once again local amenity societies and groups can act as partners to help the council in delivering policy as they are closer to the ground and action, often monitoring situations before officers know (e.g. Baring Road Green Chain Walk development's bulldozers and fences up or poisoning of trees in Willow Tree Stable land where the Council was brave and quick to establish a blanket TPO). It will be interesting to see the post covid and Brexit effects evolving as regards land values and development pressure.</p> <p>P377</p> <p>10.26 Please include 'proposals having regard to rivers' as they have been highlighted as part of Lew's Local Distinctiveness (The LBL crest is based on the rivers' Confluence). Lewisham is well known for its rehabilitation of rivers but there is plenty more to do (QWAG have been promoting 'Operation Kingfisher' since 1990. After some successes it is now adapted as Quaggy Links').</p> <p>10.27 Management Plan should include maintenance costs including officer time for outreach to and managing volunteers (which represents good value for money). such as funding cleanup projects in rivers (e.g. Cornmill Gdns if L&Q cannot get personpower together). The decking in Cornmill Gardens has rotted and is now fenced off as dangerous. Ongoing maintenance should have been factored in or better materials used originally. As well as boundary hedgerows (which can all dd up to those corridors) there should be space for wildflower meadow creations whether marginal or whole areas which may be on steep inaccessible slopes (93-121 Ermine Road flats have a glorious wildflower embankment that the groundsmen prefer not to over mow or strim as dangerous! Planting for pollinators should be encouraged and an elimination of pesticides</p>		
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			<p>stipulated. If the estates are to be run by the likes of Lewisham Homes then an officer should be responsible for Biodiversity enhancement, perhaps funded by the developers. Lewisham Homes now sends a representative to the Lewisham Biodiversity Partnership as they are responsible for significant swathes of green space. Peabody had a dedicated ecological officer.</p> <p>10.28 Too often large existing trees have parts of their roots covered by tarmac or concrete for road or pavements. Informal parking under trees should also be designed out. The two large oak trees by Burnt Ash Pond in Melrose Close have thrived since they were protected in the Council estate development</p>		
	2	GR 04	Urban Greening Factor - should be applied to existing highways and public space.	Noted. The draft Local Plan proposes to apply the London Plan policies on Urban Greening Factor. Greening measures may include elements of public realm, however there are likely to be feasibility issues in terms of the highway network.	No change.
Blackheath Society no 2	2	GR 04	<p>GR4 Urban greening and trees. We support the policy. There is a lack of specifics concerning tree cover. The plan says, 'London Plan sets out the Mayor's aspirations to increase tree cover in London by 10 per cent by 2050, which this policy provides support for'. It is not at all evident, in terms of quantification, how LBL's Plan will provide support for the London Plan.</p> <p>We note that the Plan identifies that: 'Many of the Borough's trees are located in private gardens..... Development proposals need to maximise opportunities to retain these trees for their ecosystem services and avoid compromising and encroaching available space for them...'</p> <p>However, no detail is given on how the council will give effect to the desire to protect trees in private gardens. We recognise that the council's powers are limited by legislation but we deplore the fact that an impression is given that the council will be able to protect rear garden trees when the reality is very different. We believe that a policy of openness and honesty about the limits of the council's ability to deliver on the Plan would engender greater resident confidence and trust.</p> <p>We similarly regret that the opportunity has not been taken to make a link, with detailed proposals, with the need to achieve carbon neutrality in coming years.</p>	Noted. The Local Plan seeks to increase cover by including policies setting out that development proposals must suitably demonstrate that tree retention along with tree and other green infrastructure planting have been considered as part of the design-led approach.	Supporting text revised to acknowledge the protection of trees in private gardens is limited.
Blackheath Society no 2	2	GR 04	GR4. There is a need for good baselines to be established on tree canopy cover and TPO population so that targets on retention/increase can be set and monitored.	Noted. The National Planning Policy Framework and London Plan do not require Local Plans establish a baseline on the tree canopy cover or the number of trees with a TPO.	No change.
Deptford Society	2	GR 04	Page 373 GR4D Living roofs, which are mandatory on flat roofs of new developments in Lewisham, need to be generous, well-maintained living roofs, not just token sedum that is never re-visited. A programme of maintenance is usually required at planning - but is this ever checked or enforced? The council should consider how best this can be maintained.	<p>Noted. The draft Local Plan policy GR4 requires that development proposals demonstrate that green roofs and walls will function effectively over the lifetime of the development. This may include details of management and maintenance plans.</p> <p>Planning enforcement is outside the scope of the Local Plan.</p>	No change.

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

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

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

		<p>and other green infrastructure planting have been considered as part of the design-led approach and the development will:</p> <p>a. Provide for the sensitive integration of all trees whilst ensuring any new or replacement on-site provision is of a high ecological quality (including appropriate species, stem girth and life expectancy) and positively contributes to the microclimate;</p> <p>Page 374</p> <p>b. Protect veteran trees and ancient woodland;</p> <p>c. Retain trees of quality and associated habitat, wherever possible, with appropriate arrangements to secure their protection throughout demolition, construction, and external works, to the occupation stage of development;</p> <p>d. Avoid the loss of, and mitigate against adverse impacts on, trees of significant ecological, amenity and historical value;</p> <p>e. Ensure building foundations are sufficient to be climate change resilient in proximity to trees; and</p> <p>f. Ensure adequate replacement tree planting where the retention of trees is not reasonably practical, with replacement provision that meets the requirements of (a) above.</p> <p>F Proposals involving the removal of protected trees (i.e. those covered by a Tree Protection Order and trees within Conservation Areas), or those that would have a detrimental impact on the health and visual amenity provided by protected trees, will be strongly resisted. The Council may identify and seek to protect trees that are of a significant amenity, heritage, ecological, or other value through the development management process.</p> <p>G “Major development proposals, and where appropriate other development proposals, will be required to submit a Landscape Design Strategy and Arboriculture Survey to demonstrate that landscaping and other urban greening measures are appropriate to the site, can be implemented effectively and suitably managed over the lifetime of the development.”</p> <p>QWAG comments:</p> <p>QWAG supports much of this section. The same concerns about internal capacity, competence and culture apply. The Local Plan should ensure that no more development takes place with superficially green planting schemes. There should be proper ecological assessment of the potential of the land and sites to inform how trees, woodland, hedging, planting and other features are planned and maintained over time. That is the kind of step change required from all development instead of the reliance to date on low value amenity planting and trees stuck in concrete and rubbish strewn planters which the Council has permitted.</p> <p>How will the Council and the Plan ensure this becomes the norm?</p>		
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South East London Labour for a Green New Deal	2	GR 04	The draft plan sets out a strong commitment to trees preservation in the face of housing development. However, this appeared to mean little when the Tidemill Community Garden and its mature trees were destroyed for a new development in Deptford (a deficit area for nature). Will the plan ensure real protection on future developments or will there be numerous cases of “mitigation”, in the pressure to build homes?	The Local Plan cannot influence development which has already been granted planning consent.	No change.
Telegraph Hill Society	2	GR 04	We do not consider that these proposals go far enough to provide for the Mayor of London’s targets on 50% green cover nor to meet the Borough’s aspirations on biodiversity (see our comments on GR3).	Noted. Draft Local Plan Policy GR4 is considered to set a sound basis for tree management and protection, which is consistent with the London Plan Policy G7 (Trees and Woodlands). Policy GR4.4 provides detailed requirements for replacement trees, and the supporting text sets out the Council’s approach to use the CAVAT method for any off-site provision, which is considered a good practice approach.	No change.
Telegraph Hill Society	2	GR 04	As regards policy GR4.D we note that “ <i>development proposals should maximise the use of living roofs and walls</i> ”. As living roofs and walls are not typically part of the current urban typology we are unclear how they fit with the requirement of policy QD1 and especially QD1.D.h . In particular, as regards Conservation Areas, it is unlikely that living roofs and walls will fit harmoniously with the appearance of the area. More generally, they are likely detrimentally to affect and damage the aesthetics of Conservation Areas by their incongruence appearance. Guidance is needed within the Plan as to how these sections inter-react, with a clear preference being given to preserving the character and appearance of any Conservation Area impacted by such proposals.	Noted. The supporting text clarifies that living roofs and walls will be supported where they appropriately respond to local character and comply with other Local Plan policies. This includes consideration for the historic environment, where development must preserve the significance of heritage assets.	No change.
Telegraph Hill Society	2	GR 04	We note that open spaces have been created around many of the new developments and whilst in purely spatial terms they may provide some replacement for private gardens they remain generally unused except for dog exercise. Observation shows that they are little used by children or families for exercise and cannot have the same leisure or therapeutic benefits as gardens.	Noted. The local plan seeks to ensure through policies on high quality design that in the design on new public realm consideration is given to given to the ways in which people use the public realm and how its design will influence their experiences within it.	No change.
Telegraph Hill Society	2	GR 04	We note that there is no reference to street trees mentioned in this section although they clearly contribute heavily to the objectives of the green policies. We believe that a sub-policy should be added to GR4 to protect street trees, to set targets for the increase in the number of street trees, and to control their removal. We appreciate that the majority of street trees are in the care of the Council and that this Plan primarily relates to development but see no reason why, if the Council is seeking to realise its “Vision”, the Plan should not set out the intentions and aspirations of the Council as regards the elements within its own care. The explanations in § 10.21 through § 10.25 would seem to apply as much to the trees in the care of the Council as to any others.	Disagree. The policy seeks that development proposals retain existing trees which includes street trees as well maximise opportunities for additional tree planting on streets..	No change.
The St John’s Society	2	GR 04	GREEN INFRASTRUCTURE	Noted. Tree Protection Orders are outside the scope of the Local Plan.	No change.

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

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

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

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

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

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

			<p>but now are all to be rented. This has resulted in a massive unsightly advertising sign negating the look of the Court, which, as they are now for rent could be there, ad infinitum. The permanent Triangular signs up on the building also mar the look and being over the entrance are a potential hazard. This happened along the shopping parade when one fell onto the pavement!</p> <p>Lack of application of S215 Notice Of Town and Country Planning Act 1990 Where the condition of Land and Buildings adversely affects the amenity of an area.</p>		
Blackheath Society no 2	2	HE 01	<p>HE1 Lewisham's historic environment. What extra protection is to be afforded to heritage assets (stat & non-stat) and their settings, especially outside CAs? We would like more local listings and more Article 4 protection for areas, plus speedier and more effective use of S215 orders (only one mention, at p162) to protect, all to help protect the unique character of local neighbourhoods, which is quickly lost.</p>	<p>The Local Plan policies sets out approaches to conserving and enhancing heritage assets and their significance in line with higher level policies.</p> <p>The making of Article 4 Directions and the use of Section 215 Orders are potential tools, but outside the scope of the Local Plan. This will be considered subject to resources available.</p>	No change.
Brockley Society	2	HE 01	<p>Page 159, paragraphs B and C: these paragraphs contemplate a balancing exercise between avoiding harm to the heritage value of an asset and securing a public benefit. This balancing exercise should begin from the presumption that harm to heritage value is impermissible and be weighted in favour of preserving that heritage value. Any harm must be limited to that necessary and the future of the asset should be secured. It should also be made clear that this exercise does not apply to conservation areas, listed buildings or other designated assets which the Council has a legal duty to protect. We therefore suggest the following amendment.</p> <p><i>“B. All proposals in the historic environment should assess whether the site, building or structure is – or could be – identified as a heritage asset. The Council will consider the significance of the asset and the impact of the proposals on its special interest. <u>The Council will resist proposals that harm the heritage value of the asset unless all the following conditions are met:</u></i></p> <ul style="list-style-type: none"> - <i><u>there is a clear and compelling public benefit that cannot be achieved without causing harm to the heritage value of the asset;</u></i> - <i><u>the harm is limited to what is necessary to achieve the public benefit; and</u></i> - <i><u>the proposals clearly demonstrate how the remaining heritage value of the asset will be protected over the short and long term.</u></i> 	The Local Plan policies sets out approaches to conserving and enhancing heritage assets and their significance in line with higher level policies.	No change.
Deptford Society	2	HE 01	<p>Page 157 We welcome the requirement for developers to submit a heritage statement, but such statements must be of sufficient quality and accuracy to be meaningful. The DS</p>	Noted.	Local Plan amended with new supporting

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

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

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

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

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

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

			ornaments, the type of tiling, brick work and brick bonding. A more detailed approach would make it clearer to applicants exactly what is expected and reduce the level of work that the Planning Department needs to do on each application to ensure it meets the requirements of heritage conservation.		
Telegraph Hill Society	2	HE 02	It is unclear what the interaction is between policies HE2.B and HE2.C where a proposal includes both new development and retention of existing elements; HE2.C would be better worded to read <i>“Proposals for the retention of ...”</i> .	Agreed.	Local Plan amended as suggested.
Telegraph Hill Society	2	HE 02	Policy HE2.C is capable of alternative readings and we would suggest it would be improved and strengthened by the following deletion: <i>“Proposals involving the retention, refurbishment and reinstatement of features that are important to the significance of a Conservation Area will be supported.”</i>	Disagree. The policy provides a positive approach to development in accordance with the NPPF.	No change.
Telegraph Hill Society	2	HE 02	We note that DM 36.5 and DM35.6 do not seem to be included in the proposed Plan.: 5. The Council will encourage the reinstatement or require the retention of architectural and landscaping features, such as front gardens and boundary walls, important to an area's character or appearance, if necessary, by the use of Article 4 Directions. 6. The Council will require bin stores and bike sheds to be located at the side or rear of properties where a front access to the side and rear exists. We strongly believe that these should be included in order to meet Strategic Objective F15. DM 36.5 provides a lever which can be used to negotiate improvements to proposals in line with Explanation in § 6.19DM36.6, whilst detailed, seeks to bar one of the worst issues currently marring the appearance of Conservation Areas.	Agreed.	Local Plan amended as suggested.
The Fourth Reserve	2	HE 02	Area of Special Local Character - the Buckthorne Cutting meets the criteria: Area of Special Local Character - the Buckthorne Cutting meets the criteria It is distinguished from the surrounding area or other parts of the borough which are nearby by the quality or extent of its' landscape <ul style="list-style-type: none"> the Buckthorne Cutting landscape is unique. At one end (Section A) are veteran coppiced sweet chestnut trees that appear nowhere else along the 4km railway cutting. At the other end (Section B) is an extensive reed bed that has the unusual feature of sitting high on a hill. the Buckthorne Cutting landscape is unique in that sections A and B are divided by the Eddystone Road bridge which is an Archeological Priority Area as it is part of a Roman Way. the Buckthorne Cutting landscape is the last remaining remnant of 	The Buckthorne Cutting will be assessed for consideration as an ASLC through proactive conservation work, in accordance with the process for identifying ASCL, which will be established in due course. The status of the Buckthorne Cutting in terms of open space and biodiversity/geodiversity is addressed elsewhere in the Consultation Statement.	No change.

			<p>what was once Brockley Green (a historic name no longer on maps)</p> <ul style="list-style-type: none"> the Buckthorne Cutting landscape is unique in that it consists of a row of coppiced hedgerows with pleaches suggesting they were once a boundary hedge (Section A) - a boundary marker is present in Section B. the Buckthorne Cutting trees are visible behind the historic building of the Brockley Jack as you approach from Sevenoaks Road/Blythe Hill <p>- a vista that would have been the same for centuries and gives a sense of Lewisham's past.</p> <p>The area or group of buildings possesses an overall character with identifiable or distinctive architectural features which are worthy of preservation</p> <ul style="list-style-type: none"> the Buckthorne Cutting has 3 iconic historical buildings - St.Hilda's Church (Grade 2) at one end, the Rivoli Ballroom (Grade 2) at the other end and the Brockley Jack pub and theatre (AAP) in the middle. <p>These buildings have several direct links to the railway cutting aside from their close proximity making this small section of Crofton Park (Brockley Green) a uniquely important landscape to Lewisham Borough and the local area.</p>		
The St John's Society	2	HE 02	<p>Conservation areas should not be kept in perpetuity, and a progressive approach to conservation is needed to balance the heritage concerns alongside the conservation of nature, energy, and community.</p> <p>Innovative and progressive strategies are needed both to enhance and enrich current heritage assets but there needs to be balance and importance placed on excellence in design.</p>	<p>Noted. Conservation Area Appraisals identify the significance of each area, what might cause harm and in recent CAAs an associated Management Plan. They are subject to periodic review and updating. The Local Plan is considered to take a positive approach to preserving and enhancing the historic environment, consistent with the National Planning Policy Framework and Historic England guidance.</p> <p>The presence of a Conservation Area does not preclude new development from being delivered within that area.</p>	No change.
Deptford Society	2	HE 03	Page 171 point A: Development proposals will ONLY be supported where they preserve or enhance...	Noted.	Local Plan amended as suggested.
Historic England	2	HE 03	Archaeology: We would note that the data underpinning the borough's Archaeological Priority Areas, as referenced in respect of Policy HE3 (non-designated heritage assets), at Schedule 3 and in relevant site allocations, dates back to around 1998. These therefore require revision, ideally as part of the Local Plan process. If not, the Local Plan should carry a	Noted. GLAAS are undertaking reviews of borough's APAs in line with revised approach in NPPF. Lewisham's APAs are expected to be reviewed in 2023.	Local Plan amended with additional supporting text to note that GLAAS will be reviewing APA

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

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

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

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

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

			<p>be served by a lift to facilitate both early years access and mobility access.</p> <p>As an efficient method of communicating my thoughts on this subject , I will describe a section through what I consider to be the tallest acceptable building form for the accommodation of family homes -</p> <p>[1] - Ground Floor - Ground level accommodation - such as mobility flats , welfare facilities , local shops , local hospitality rooms , studio /craft accommodation , very light industry . To achieve the diverse weave of the healthy urban fabric.</p> <p>[2] - First Floor - Family maisonettes accessed by front doors on a corridor served by a lift. The maisonettes are to have a generous external balcony, oriented south if possible. Corridor could be extended by bridging into other blocks, if achieved with considerable design skill.</p> <p>[3] - Third Floor - Family maisonettes accessed by front doors on a corridor served by a lift. The maisonettes are to have a generous external balcony, orientated south if possible.</p> <p>[4] - Fifth Floor , roof deck level , building forms set back to be unseen from ground level viewing or made a very occasional visually interesting event - Accommodation with a set back profile served by a lift. Such as early years play areas external / internal, creche room, craft room, clothes drying accommodation, community room, storage rooms, etc.</p> <p>The above building section is of a five storey building that I consider is the very highest that is acceptable in a housing environment. Higher buildings will damage the ambience of domestic wellbeing, particularly relevant to the matter of the wellbeing of early years children and all young people.</p> <p>The ground level landscaping in such a housing environment is a critical matter. Contemporary landscape design techniques are able to achieve excellent results. In such a landscape the occasional single storey building, probably with a pitched roof can be an asset in achieving the ambience of domestic wellbeing that is required.</p>		
	2	HO	<p>Housing Development</p> <ul style="list-style-type: none"> Affordable housing should not be provided by selling off any more public land. This is a one-time only benefit and feeds into the long term increase in land value inequalities which benefit only owners and developers to the detriment of the majority of residents and the rest of nature. The Planning Department needs to be given sufficient resources to uphold decisions and constraints and 	<p>Noted. Property acquisition from private landowners, planning department resources / planning enforcement, and the detailed nature of apprenticeships (e.g. gardening) are outside the scope of the Local Plan.</p> <p>The London Plan introduces a small sites housing target for all London boroughs, and its policy H2 compels boroughs to boost the delivery of housing on small sites. The Council has</p>	No change.

			<p>monitor developments. This is particularly important if the Council is going to rely on many small developments as well as some larger ones to fulfil its housing quota. Infringements by developers in this area have been largely ignored e.g. Churchwood Gardens. There should be zero tolerance of changes to social housing provision after planning permission has been granted.</p> <ul style="list-style-type: none"> • The Council should lobby the London Mayor and Assembly and the Government to tighten the rules and penalties of land hoarding. Our precious green spaces are often under threat when there is hoarded land with planning permission sitting undeveloped nearby. • It is difficult to believe in the Council's commitment to 'sensitive intensification' given its record in supporting the Corporation of London's proposals for developments of Mais House and Otto Close, which are totally insensitive to both the community and natural environment of the Sydenham Hill Ridge area. • All housing developments should be required to use up to date energy efficiency measures (which will obviously change over time). • All housing developments should be required to provide habitats for wildlife that uses buildings e.g. swifts, sparrows, starlings, house martins, pied wagtails, bats, mason bees etc. This would include green roofs, swift bricks, bee bricks etc. • All housing developments of more than one building, should include green outdoor space that residents can actively engage with. We need to move away from sterile, soulless, easy maintenance shrubs and non-native small trees, and think more about wildflower meadows, community orchards, mixed hedgerows not fences, flexible growing areas for residents who want to garden and similar. Green spaces that residents want to be in and get involved with are fundamental to mental health. When they are provided at a very local level, it becomes more possible for children to play outside again, without it involving an adult supervised journey to a park. Such spaces would also reduce the excess pressure on the local nature reserves like One Tree Hill and Sydenham and Dulwich Woods, which has caused so much damage from trampling and thoughtless dog walkers, particularly over the past year. • The Council should provide gardening apprenticeships that include valuing and working with the existing fauna and flora, rather than ignoring or destroying it. • It should be recognised that brownfield sites, especially those that have been out of use for any time, may have become important natural habitats. Each site needs to be examined on its own current environmental merits, and not just a paper evaluation based on what its previous use might have been. 	<p>prepared a Small Sites SPD to support this approach and ensure new development is sensitive to its local context.</p> <p>The Local Plan requirements for energy efficiency in new developments are set in line with the London Plan.</p> <p>The Local Plan adopts the London Plan housing standards for internal and outdoor amenity space, and children's play space, along with introducing new requirements for urban greening and net gains in biodiversity. In addition, the plan identifies areas deficient in access to open space and sets out policy interventions to address this.</p> <p>The Local Plan prioritises the use of brownfield land for new development, thereby ensuring green and open spaces are protected. The plan makes clear that planning applications to be accompanied by assessments so that consideration can be given to ecology, landscaping, and public realm on a site by site basis.</p>	
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	2	HO	<p>On 10th March it is recorded that the Small Sites Supplementary Planning Document was approved by the Mayor and Cabinet.</p> <p>What is the implication of this approval?</p> <p>What is defined as a “small site”?</p> <p>What is the policy linked to this approved document?</p> <p>Why did it need to be approved in advance of the Local Plan?</p> <p>Is Rushey Green – Bradgate Rd on page 259 of the consultation document considered to be a small site?</p> <p>Should we infer that the approval of this document means that a planning application to build 119 units in a tower at Bradgate Road can be given fast track approval to the detriment of the residents</p>	<p>The Small Sites SPD has now been adopted by the Council. It can be a material consideration when determining planning applications.</p> <p>The London Plan introduces a small sites housing target for all London boroughs, and its policy H2 compels boroughs to boost the delivery of housing on small sites, including through the preparation of briefs and design codes for small. The adoption of the SPD does not imply that planning permission will be granted on specific schemes. It is a tool to help support housebuilders and ensure that small site development is appropriate to its local context.</p> <p>The proposed site allocation for land at Rushey Green and Bradgate Road is roughly 0.5ha in size and not a small site by definition.</p>	No change.
	2	HO	<p>All this talk in the Local Plan for ‘affordable’ housing seems a bit naïve when facing this kind of development. I have also read they were not even designed to be ‘owner occupied’, but as investments for overseas buyers. What could more comprehensively destroy local communities? I, for one, used to go to Lewisham a lot to visit, eat and shop. I do not do that anymore. It’s too depressing.</p> <p>Developers contributing to the local stress on infrastructure: I agree that all developers should contribute towards relieving the increase density that they will be producing, with some adding surgeries for instance, or support for transport links.</p>	<p>Noted. The draft Local Plan acknowledges the issues around housing affordability. It therefore sets out a strategic target of 50% of all new homes to be genuinely affordable, based on local income levels.</p> <p>The Infrastructure Delivery Plan has been prepared to identity the level of infrastructure needed to accompany housing growth and the Local Plan recognises that CIL and planning obligations from private developers will be needed to help pay for it.</p>	No change.
	2	HO	<p>EMPTY PROPERTIES: Again, GRANTS are the solution. All kinds of people and in particular young couples would happily engage with the idea of restoring an empty property if they had some assistance to do so. It could be an obligation to occupy the property for a while after, or else opportunist developers would rapidly move in. There used to be a number of grants of this kind that seem to have been stopped. This would have an immediate effect, it would attract individuals and couples, rather than companies, thereby protecting the ‘affordable’ aspect. The current ‘affordable’ label is a misnomer.</p> <p>It seems developers are encouraged to sell a number of their apartments cheaper, but once they have been bought, they can then be sold on later for market price, so that does not work more than once round. When they are obliged to ‘rent’ at affordable prices again, there is no method to ensure someone is not ‘renting’ to then sub-let, on to someone else. There appears to be no monitoring process.</p>	<p>Noted. Grants, rents, sub-letting and sales of private housing are outside the scope of the Local Plan.</p> <p>The Local Plan seeks to address many of the issues raised in the representation, including by: setting a strategic target for 50% of all new homes to be genuinely affordable; signposting that the Council will use powers available (i.e. enforcement) to bring vacant units to back into use; encouraging developers to market new housing units for sale or rent to existing local residents and workers before advertising them more widely to others (although Council exercises no legal control over this); and using S106 agreements to define the amount, tenure and type of affordable housing delivered on new sites.</p> <p>The Council is undertaking an ambitious home building programme to build new genuinely affordable homes on Council owned land. Policies on estate regeneration and renewal are set out in the Local Plan.</p>	No change.

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

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

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

				<p>However it is acknowledged that further guidance could be provided on housing size mix.</p> <p>The Local Plan adopts the London Plan housing standards, including minimum space standards.</p>	
Deptford Society	2	HO	<ul style="list-style-type: none"> - Pressure to deliver housing seems to be warping proper planning, both in terms of scrutiny and to accommodate other uses such as light industry and business, as well as protection of green space etc. - We welcome the attention given to housing for different types of users; however flexible, adaptable housing is just as important, if not more so - There is no specific mention of how the response to the climate emergency will be reflected in the plan for housing delivery. 	<p>Noted. The Local Plan must demonstrate how a significant uplift in housing will be facilitated to meet the housing target for Lewisham. It sets a strategy to deliver Good Growth, in line with the London Plan, taking into account needs for the local economy, green infrastructure, etc.</p> <p>The draft Local Plan includes a policy on inclusive and safe design, which covers standards for wheelchair user dwellings and accessible/adaptable dwellings.</p> <p>Addressing the climate emergency is a key strategic objective of the Local Plan. There are policies included throughout the plan to address this, including the Part 2 chapter on Sustainable design and infrastructure.</p>	No change.
Greater London Authority	2	HO	<p>Housing</p> <p>The Mayor welcomes the borough's intention to meet its London Plan housing target of 1,667 units/year (Table 4.1). For the 15-year Plan period it has identified Site Allocations delivering 25,000 units. Over 27,000 units could be achieved, if sites in Bell Green/ Lower Sydenham supported by Phase 2 of the Bakerloo Line Extension are included.</p> <p>However, references to local housing need as per Government Standard Methodology appear unnecessary and confusing, as within London the London Plan is responsible for 3 establishing and distributing London's housing requirement across the capital. This is underpinned by London Plan Policy H1(A) and para 4.1.2.</p> <p>The Mayor notes that the council's monitoring of 'windfall' development on small sites (para 7.21) matches the London Plan's small sites target of 379 units/year (Table 4.2), and that the council will prepare SPDs to facilitate appropriate development of small sites.</p>	<p>Support for the housing target and small sites target are noted.</p>	<p>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.</p>
Lee Forum	2	HO	<p>Population changes and housing need is dynamic. Over twenty years much can change. The London Plan runs from 2019 to 2041. The annual housing targets, are set for only the first ten years of the Plan. This reflects the capacity of land suitable for residential development and intensification identified in the 2017 Strategic Housing Land Availability Assessment (SHLAA) which, due to the dynamic nature of London's land market, does not attempt to robustly identify capacity beyond 2029. Whilst the council reports it will be keeping the Plan updated there are clearly points at which reviews will be needed. Targets will be adjusted. The council needs to join with other boroughs and ensure that targets reflect available land and are</p>	<p>Noted. The Local Plan seeks to deliver on the London Plan 10-year housing target for Lewisham. The National Planning Policy Framework provides that there must be a 5 year supply of 'deliverable' sites identified, and from years 6-10 and beyond, 'developable' sites and broad areas for growth.</p> <p>The Council is required to review its adopted Local Plan every five years, in line with government legislation. Any future review will take into account changes to regional and national policy, as well as new or updated evidence.</p>	No change.

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

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

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

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

			<p>The Local Housing Need figure is currently irrelevant for London Boroughs. Paragraph 1.4.4 of the London Plan makes this clear:</p> <p><i>“The London Plan is able to look across the city to plan for the housing needs of all Londoners, treating London as a single housing market in a way that is not possible at a local level. In partnership with boroughs, the Mayor has undertaken a Strategic Housing Land Availability Assessment to identify where the homes London needs can be delivered. Ten-year housing targets have been established for every borough, alongside Opportunity Area plans for longer-term delivery where the potential for new homes is especially high. Boroughs can rely on these targets when developing their Development Plan Documents and are not required to take account of nationally-derived local-level need figures.”</i></p> <p>Planning Practice Guidance¹ (PPG) is also clear that the Mayor, through the London Plan, is responsible for establishing London-wide need and disaggregating this to Boroughs:</p> <p><i>“Is a cities and urban centres uplift applied in London and if so, how does it work?”</i></p> <p><i>Yes, an uplift applies in London. London is unique in that it has no single city centre which can carry need for the city area. Therefore a 35% uplift is applied to the entire SDS area (which covers all the London boroughs), rather than to the local authority which contains the largest proportion of London’s population. However, it should be noted that the responsibility for the overall distribution of housing need in London lies with the Mayor as opposed to individual boroughs so there is no policy assumption that this level of need will be met within the individual boroughs...</i></p> <p><i>How should local housing need be calculated where plans cover more than one area?</i></p> <p><i>...Where a spatial development strategy has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to re-visit their local housing need figure when preparing new strategic or non-strategic policies.</i></p> <p><i>The London Plan was examined under the NPPF 2012 as per transitional arrangements. This issue is noted in paragraph 131 of the London Plan panel report²:</i></p> <p><i>“Owing to the transitional arrangements for spatial development strategies the local housing need assessment referred to in the 2019 NPPF is not directly relevant to the current calculation of need in London. Furthermore, whilst the 2016 household projections post-date the SHMA, the PPG provides that a change in the housing situation does not automatically mean that assessments are rendered out-of-</i></p>		<p>other boroughs to meet its housing target.</p>
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			<p><i>date. There are too many uncertainties surrounding the implications of Brexit for it to be factored in.”</i></p> <p><i>Therefore, the local housing need process would not apply, at the earliest, until the London Plan is reviewed. Even then, the PPG3 allows for alternative approaches to assess housing need, so it cannot be assumed that the local housing need figure would definitely apply in future.</i></p> <p><i>The fact that the Secretary of State (SoS) did not direct changes to the London Plan in relation to housing need or targets is a clear sign that MHCLG accept the approach to meeting housing need in the adopted London Plan. The written ministerial statement of 16 December 2020⁴, which also introduced the updated method of establishing local housing need, explicitly referenced London, and noted that the focus in London is on the medium and long-term, i.e. the next iteration of the London Plan:</i></p> <p><i>“In the short-term we expect to agree the London Plan with the Mayor early in the new year which will set his plan for, amongst other things, meeting London’s housing need. This will support greater ambition in London, but alone won’t go nearly far enough to meet need in London. We now need to focus on the medium and long term and create a plan to better address London’s housing needs, whilst protecting the character of London’s communities, particularly in outer London, and London as a place for families.”</i></p> <p><i>Looking at the recent City of Westminster Local Plan inspector’s report⁵, it is clear that the approach detailed above has been applied. Westminster proposed a housing target in excess of their London Plan target, and the inspector’s concluded that this approach was not appropriate, referring to the section of the PPG set out above.</i></p> <p><i>In summary, Lewisham should not plan for additional housing above and beyond the London Plan housing target where this additional housing cannot be met within Lewisham. For avoidance of doubt, Bromley do not have capacity to meet any unmet housing need from Lewisham.</i></p>		
London Borough of Tower Hamlets	2	HO 01	<p>The proposed focus on creating additional affordable housing is encouraged and was a major focus in our own Local Plan. This is considered to be particularly important due to Lewisham’s increased housing targets and the need to ensure contributions for affordable housing coming from new developments.</p> <p>While the increased housing numbers may be difficult to achieve, Tower Hamlets is not in a position to take any additional housing figures from Lewisham, as we have the highest targets of any London Borough. We believe that the</p>	Noted.	Local Plan amended to remove references to the standard methodology for Local Housing Need, and make clear that the Local Plan will

			proposed Bakerloo line extension will provide an opportunity for more transit-oriented housing development to be brought forward. It should also be noted that London Plan housing targets should be prioritised over borough need.		<p>ensure delivery against the London Plan housing target for Lewisham.</p> <p>Supporting text amended to clarify that Lewisham will not rely on other boroughs to meet its housing target.</p>
NHS (HUDU)	2	HO 01	<p>HO1 Increasing Housing Supply</p> <p>As outlined earlier in this response the retail and employment studies should be revisited, in light of the paradigm shifts which potentially offer new housing supply opportunities which could then be included within the policy.</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 GLA population projections continue to forecast growth for London over the long-term, despite short term impacts from Brexit and Covid-19.</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>
Royal Borough of Greenwich	2	HO 01	<p>The supporting text of Policy HO1, at paragraph 7.9, asks whether neighbouring local authorities are in a position to accommodate any residual housing need arising in Lewisham. We can confirm that Royal Greenwich is <i>not</i> in a position to accommodate any of Lewisham's residual housing need.</p>	<p>Noted. The London Plan (2021) housing target for Lewisham will be reflected in the Local Plan as the strategic housing requirement.</p> <p>The Local Plan provides that the London Plan housing target for Lewisham can be met entirely within the borough i.e. there is no unmet need that would have to be addressed from other London boroughs or local authority areas.</p> <p>The Council will continue to work with Royal Borough of Greenwich on strategic planning matters through the Duty to Cooperate.</p>	<p>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.</p>

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

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

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

		<p>nothing in between, with no migration path between one and the other and the consequential departure of residents from the area in search of cheaper family homes. Worried about this trend and its effects on the community, the Telegraph Hill Society was instrumental in the campaign for a block on further flat conversions which was ultimately introduced in the last UDP. Since the introduction of the UDP policies this trend has reversed to some extent with flats being converted back into houses and no new subdivisions.</p> <p>Were such subdivisions allowed again, we believe the trend previously observed towards the erosion of the local community would recommence. Given the importance of local communities, and particularly the vibrant community in Telegraph Hill, we are therefore deeply concerned with the proposed introduction of this policy.</p> <p>More generally flat conversions of even larger properties exchange quality larger family homes for poor quality smaller flats and homes, which simply by virtue of being conversions cannot be as good as purpose-designed flats. Few modern developments in Lewisham include replacement houses with 4 or 5 bedrooms. Equally few new developments incorporate houses with gardens as, in order to maximise density, most are flats in tower blocks. The policy will therefore reduce the supply of larger houses with gardens and push the prices of those up further still and out of the range of even more families.</p> <p>We would further note, as we have stated in paragraph 29, the impact of COVID-19 has permanently changed the way people work, and many more people will now be working from home for ever and hybrid mixed home/office working is projected to become the norm. Occupiers will expect their properties to be usable for this purpose and we anticipate that will significantly increase the demand for extra space and extra rooms. A 130 sq m property will not be sufficient to meet the demand for a family size accommodate with one or two people working partly or wholly from home.</p> <p>We strongly believe, therefore, that the existing policy of resisting flat conversions in general should be retained.</p> <p>If, despite our strong objections, the proposed policy is included, the minimum level for the size of properties which can be converted should be set higher (150 sq m) or there should be a limit for the maximum amount of flat conversion allowed in any area (or maybe street) set at, say, 50%. If a Borough-wide policy like this is not acceptable, then at the very least, Conservation Areas should be exempted from the</p>	<p>existing family unit, and wherever possible, made accessible to residents in other units.</p> <p>Conversions will be required to meet the nationally described space standards, which are reflected in the London Plan and Local Plan. The benchmark 130sqm figure provides a basis for considering the size of housing that would be suitable for conversion in this instance – this is included in the extant Development Management Local Plan and has been absorbed into the new Local Plan.</p> <p>It is not considered that a blanket restriction on conversions within Conservation Areas is appropriate, as this would be inconsistent with the National Planning Policy Framework in setting a positive approach to development. The Part 2 Heritage policies are considered to provide a sound basis for preserving and enhancing the significance of heritage assets, including Conservation Areas.</p>	
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			conversion policy in order to prevent the type of issues we have highlighted above in our area.		
Telegraph Hill Society	2	HO 02	If, despite our objections, an area-based limit is all that remains in this policy, we want it noted that, since additions such as loft extensions etc. add to the space/area, there is an opportunity for developers to progressively get around any remaining protection by first adding an extension, thereby increasing the gross internal floor area to above 130sq m. To prevent this “existing dwelling” should be replaced by “original dwelling”.	Noted.	Policy amended as suggested, to refer to original building.
Telegraph Hill Society	2	HO 02	<p>With respect to policy HO2.E, we have examples of where houses suitable for families have been turned into HMOs and then the HMO turned into flats, the latter being justified because the definition in the existing DM3 and the proposed HO2.E refers to the “conversion of a single family house/dwelling”. HMOs can be easily converted back into single family dwellings whereas flats cannot. We believe that the wording now used which includes “or self-contained unit with 3+ bedrooms” would scope in most HMOs into this policy. If this is not however the intention, the policy should re-written so as to ensure HMOs are included within the ambit of this policy.</p> <p>We accept that policy HO9.A seeks to resolve the issue by not allowing larger housing to be converted into HMOs. However (a) conversion into an HMO only loses housing for single family homes on a more temporary basis than flat conversion, and only allows it because policy HO2.E is drawn in such a way as not to preclude HMOs being converted into flats, and (b) the wording of HO9.A is more widely drawn than the wording of policy HO2.E. So, for example, at present a family house could be turned into an HMO if it complies with policy HO9.A and then turned into flats without the provision of a family sized unit because HO2.E does not apply.</p>	<p>Noted. An HMO is not self-contained housing by definition, in accordance with the Housing Act 2004.</p> <p>Noted</p>	Policy H02.E has been amended to make clear that the gross conversion of a single family dwelling, or self-contained unit with 3+ bedrooms, into smaller self-contained residential units (including flats) will only be supported where the gross internal floor space of the existing original dwelling is 130 sq. metres or greater. Specifying ‘the original’ dwelling mitigates the issue raised regarding the conversion of HMOs into flats
Transport for London	2	HO 02	E(e) and 7.31 - We support the policy of conversion of single-family dwellings or 3+ bedroom units to flats or smaller self-contained units. However, growth in housing should not be prevented due to parking stress as stated in the London Plan	Noted.	Local Plan amended by deleting policy point HO2.E(e)

			<p>parking policy T6. Parking controls such as Controlled Parking Zones (CPZ) should be implemented to address parking stress from additional growth, and permits should be limited to existing residents.</p> <p>Therefore, we do not support housing growth being conditioned upon additional parking accommodation or on-street parking availability as noted in sections E(e) and 7.31.</p>		and paragraph 7.31
Residents of Sydenham Hill	2	HO 02	<p>1. Housing targets</p> <p>We understand that Lewisham’s housing targets have been set by and/or agreed with the London Mayor. We ask the Council to reconsider whether there is truly the need for these high targets and/or the speed of delivery, given that:</p> <ol style="list-style-type: none"> 1. The Bakerloo Line Extension has been delayed indefinitely 2. There are empty homes in Lewisham 3. There are currently unused office and retail units which might be redeveloped as homes 4. The impact of Brexit has not yet been assessed for housing need. 	<p>Noted. The London Plan sets a housing target for Lewisham, which the Local Plan must seek to deliver on. The Local Plan must be in general conformity with the London Plan.</p> <p>The spatial strategy is not contingent on the delivery of the BLE, however the Local Plan does seek to enable its delivery to make a more optimal use of land and support growth and facilitate new inward investment.</p> <p>Whilst recognising there may be empty homes that could be brought back into beneficial use, it is unlikely that the amount of empty properties would be sufficient to significantly affect housing delivery targets, or preclude the need to identify new development sites. Lewisham’s evidence base documents (such as Employment Land and Retail Needs assessments) suggest the need to retain and create more commercial floorspace – therefore, the Local Plan does not generally seek to encourage the conversion of existing commercial properties solely for housing.</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 (which consider impacts of Covid-19 and Brexit, as much as reasonably possible).</p>	No change.
	2	HO 03	<p>If delivery of genuinely affordable housing is a clear corporate priority for Lewisham Council then The Local Plan needs to set a strategic target for 50 per cent of all new homes delivered in the Borough to be locally defined as housing at social rent levels, below the GLA’s London Affordable Rent level. This would recognise the distinctive characteristics of the local housing market and the relative affordability of different types of provision to the resident population.</p> <p>All other housing products below market levels, whether for sale or rent, are defined as intermediate housing, and should not be conflated with genuinely affordable housing.</p> <p>To be clear, a target of 50% of all new homes built to be ‘genuinely affordable’, which is defined as housing at social</p>	<p>Noted. The draft Local Plan sets a strategic target of 50% of all new homes to be genuinely affordable, with affordability linked to local income levels. This target is informed by the Lewisham Strategic Housing Market Assessment. The plan sets out that in Lewisham genuinely affordable housing is housing at social rent levels or the GLA London Affordable Rent level (in Lewisham this is GLA London Affordable Rent minus the 1 per cent above Consumer Price Index uplift).</p> <p>The Council has procedures for designating Conservation Areas, these are outside the scope of the Local Plan.</p> <p>The draft Local Plan includes policies to safeguard strategic industrial sites and ensure no net loss of viable industrial capacity.</p>	In accordance with the Metropolitan Open land Review Additional Sites Report, Buckthorne Cutting, including the Old Scouts Hut, has been designated as proposed Metropolitan

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

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

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

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

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

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

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

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

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

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

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

		<p>regard to this assessment, the Council commenced preparation of a Gypsy and Traveller Site Local Plan. This set out the approach to meeting identified local need for this group, including through site allocation policies.</p> <p>A Preferred Site Consultation was then over six weeks in 2018. Consultation responses have been considered and negotiations with landowners are progressing. This is particularly to ensure that any future proposed site is deliverable for the intended use, and that feedback from the wider public is appropriately addressed.</p> <p>9.7.6 In light of the above, the Draft Local Plan proposes an allocation at Pool Court, which is a 0.3 ha site located to just to the southwest of the Catford Masterplan area; specifically, to the south of the large proposed allocation at Wickes and Halfords, Catford Road. The site comprises a 'left over' triangle of land at the point where the two railways south of Catford cross-over one another. The River Ravensbourne borders the site, and the confluence of the rivers Ravensbourne and Pool is near adjacent to the west of the site (separated by the railway); however, the site is shown intersect flood zone 2 (as opposed to flood zone 3, which constrains Wickes and Halfords, Catford Road), presumably because the river is effectively channelled or culverted at this point.</p> <p>A related constraint is the on-site local nature conservation (SINC) designation, and it is important to consider the biodiversity value of this site not only isolation, but as one element of the ecological network associated with the Ravensbourne and Pool river valleys (see discussion of the Wickes and Halfords site above, under 'Biodiversity'). Whilst it is recognised that this site has been identified following a site selection process undertaken over a number of years, given the onsite constraints, it is recommended that further detailed assessments of biodiversity and flood risk are undertaken, with additional requirements/guidance included within the site allocation, as appropriate; the council should also continue to explore other opportunities to meet the housing needs of this group."</p> <p>https://councilmeetings.lewisham.gov.uk/documents/s76177/Annex%203b%20Lewisham%20Local%20Plan%20IIA%20-%20Interim%20IIA%20Report.pdf</p> <p>I support the need for further detailed consideration of the negative impact to biodiversity and the SINC.</p> <p>Not only this, I believe that this site is insufficient to meet the needs of the Traveller community and that as a standalone policy is insufficient to comply with the London Plan.</p>	<p>application stage, and through the Development Management process.</p>	<p>development requirements for biodiversity and flood risk management.</p>
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London Borough of Bromley	2	HO 11	Bromley welcomes Lewisham's commitment to protect existing Gypsy and Traveller provision in the Borough to meet existing and identified future need, as set out in policy HO11.	Support noted.	No change.
London Borough of Southwark	2	HO 11	It is supported that Lewisham Council can assess the housing need for Gypsies and Travellers arising within their administrative boundaries, as part of the local plan process, and to make provision of sites to address this need independently.	Support noted.	No change.
Greater London Authority	2	HO 14	Gypsy and Traveller accommodation The council's Accommodation Assessment (2015 and 2016 update) identified need for at least six pitches, which is being met through a Site Allocation at Pool Court. However, the draft Plan policy does not explicitly include a ten-year pitch target as required by London Plan Policy H14(A). The Site Allocation should also more explicitly address concerns related to biodiversity and flood risk, as set out in our response to Lewisham's Gypsy and Traveller Site Local Plan Regulation 18 Stage 3 consultation (Nov 2018). It should be noted that, following Direction from the Secretary of State, the Gypsy and Traveller definition has been deleted from London Plan Policy H14. The definition within national policy should be applied. The Mayor intends to undertake a London-wide Gypsy and Traveller Needs Assessment (para 4.14.2 of the London Plan) and there is funding available for pitch provision through the Mayor's Affordable Homes Programme (para 4.14.5).	Lewisham's GTAA (2016 update) identified the need for 6 pitches up to 2031. The Local Plan provides that this need can accommodated in full, by way of a site allocation policy (Land at Pool Court). The glossary in Appendix 2 replicates the definition set out in national policy.	Local Plan updated to include a policy with 10-year pitch target for gypsy and traveller accommodation , based on the Council's latest needs assessment, in line with the London Plan. Local Plan updated with an informative noting that the Mayor intends to undertake a London-wide needs assessment in due course. Pool Court site allocation amended to provide guidelines around flood risk and biodiversity
	3	LSA SA 15			
	3	LEA SA 05	The River Quaggy by the BMW site and along to the back of Weigal Road playing Fields is opened up with access for all – the work of the Friends of The Quaggy and Lewisham Council has seen some wonderful greening and better flood control (Ladywell Fields, Sutcliffe and Manor Park) and that work should continue and be of benefit now to the residents of Lee.	Noted. The Local Plan broadly supports river restoration and enhancement. The site allocation for the BMW site includes requirements for new development to better reveal and enhance the River Quaggy, including public access to it.	No change.

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

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

			<p>sale and the buyers expect to have a 99 year lease on a building which probably has a shorter shelf life or needs remedial work or re cladding after 40 or 50 years, what then?</p> <p>At the very least the planning system needs to ask very firm questions through policies about the life span of the building etc. Grenfell has shown how the current system of building regulations and approved inspectors is not fit for purpose and cannot be relied on.</p>		
	2	QD	<p>Also, should a type of building material be found to be retrospectively unsafe, who will foot the bill for that or will the property be sold with a long term NHBC warranty covering this? By long term I means 15 years plus? My partner is facing bankruptcy due to this issue so would not like to see it happen to other.</p>	<p>Noted. The London Plan includes a policy on Fire Safety, which all new development proposals must have regard to. The safety of building materials is covered by Building Regulations.</p>	No change.
	2	QD	<p>Good Quality Design:</p> <p>The council mentions at various points in the draft plan the fact that it wishes to promote and ensure good quality design and references its Design Review Panel as a way of assisting to this end. This and its design guides are all very helpful but are not of much use if more and more new build becomes permitted development. The London Society had a recent debate in which a number of eminent architects and designers spoke around the Build Back Better theme and how to ensure good quality design. The only person to burst their bubble was the TCPA speaker who listed the proportion of buildings being produced without the need for planning permission and how uniformly appalling it was.</p> <p>Given the current initiative to allow extra floors to be added to houses, rows of shops and blocks of flats to produce extra flats without needing planning permission I would have expected at least some recognition of this and how the council will attempt to ameliorate these impacts e.g. on neighbours, traffic, environment, etc. (just think about all those extra wheelie bins on the pavements along shopping streets for a start). You could at least identify areas where you might try to prevent it and also produce design guides and undertake wide publicity if it starts happening. There also needs to be political action.</p>	<p>Noted. Permitted Development Rights are outside the scope of the Local Plan. The removal of Permitted Development rights would need to be addressed through an Article 4 Direction, which is also outside the scope of the Local Plan.</p>	No change.
Blackheath Society no 2	2	QD	<p>General</p> <p>What is included</p> <ul style="list-style-type: none"> • Design quality (QD) - key to everything) • Height (QD4) – policy better but needs more work) <p>summary of main points:</p> <ul style="list-style-type: none"> • Optimising site capacity (QD6) – need more control over density) see following table • Public realm/greening (QD & GR) - need more/better public spaces) for details 	<p>Noted. Comments on detailed representations set out elsewhere in this Consultation Statement.</p>	No change.
Blackheath Society no 2	2	QD	<p>Good that high quality design given such prominence. Follows new London Plan.</p>	<p>Noted.</p>	No change.

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

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

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

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

			<p>QD11 - the provision of infrastructure</p> <p>The potential for 600+ new residential units and the commensurate increase in local population will put considerable pressure on local amenities and infrastructure. Developers should be required to contribute appropriate CIL payments for tangible local benefits including primary care (the improvement and enlargement of Handen Road Health Centre will be necessary), local child care, youth services and facilities and support for elderly, all should be considered. In addition improvements to the Burnt Ash Road, Lee High Road junction are required to improve traffic and pedestrian safety as well as greening the area. As the only local Park, improvements to Manor House Garden should also be required. Developers should be pressed to include appropriate physical facilities within their own proposals, and not to displace these off site by means of contributions.</p>	support the growth planned in the borough. Part 4 of the draft Local Plan sets out how new development must contribute to securing the delivery of infrastructure where appropriate by CIL and Planning Obligations.	
	2	QD 01	<p>Design (policy QD1)</p> <p>Following on from the comments above, Policy QD1 should reflect London Plan policy and state that neighbourhood character can and should evolve over time in response to changing demands while ensuring that new development is of a high quality and meets high standards of sustainability.</p>	Noted. Draft Local Plan policy QD1 addresses this point, as it provides that in responding to local character development proposals must take into account the prevailing or emerging form of development (including urban grain, building typology, morphology and the hierarchy of streets, routes and other spaces). However, additional clarification will be provided in the supporting text.	Local Plan Policy QD1 supporting text amended to signpost that neighbourhood character can evolve over time.
	2	QD 01	The council mentions at various points in the draft plan the fact that it wishes to promote and ensure good quality design and references its Design Review Panel as a way of assisting to this end. This and its design guides are all very helpful but are not of much use if more and more new build becomes permitted development. The London Society had a recent debate in which a number of eminent architects and designers spoke around the Build Back Better theme and how to ensure good quality design. The only person to burst their bubble was the TCPA speaker who listed the proportion of buildings being produced without the need for planning permission and how uniformly appalling it was.	Noted. Permitted Development rights are outside the scope of the Local Plan. The removal of Permitted Development rights would need to be addressed through an Article 4 Direction, which is also outside the scope of the Local Plan.	No change.
	2	QD 01	<p>1) Section QD 1 re design.</p> <p>It is mentioned, but, given the Climate Emergency, I would expect to see somewhere a much stronger requirement for the very best energy efficiency technology to be mandatory in new builds. Where can we find this in the Plan?</p>	The draft Local Plan Part 2 section on Sustainable Design and Infrastructure includes policies which address climate change adaptation and mitigation. The Local Plan must be read as a whole for planning decisions.	No change.
	2	QD 01	It is a mistake for developments to be 'design led'. They should instead be community led, if you are not to avoid developments being un-liked and contentious and causing animosity towards the Council and even making current residents leave the borough. I.e. Their design, use, purpose, facilities must ADD to the experience/ enhance the appearance of the communities nearby.	Disagree. The design-led approach is set out in the London Plan, which the Local Plan must be in general conformity with. However it is agreed that local communities should be engaged in the design-led approach and development process. Therefore, the draft Local Plan policy QD1 states that applicants should work closely with local communities and others likely to be affected by new development to understand the local and distinctive context of the site, as well as to consider design options that respond positively to this context.	No action.

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

Lee Manor Society	2	QD 01	Mention is made of the need for consultation with local communities, but we see no reference to the role of Conservation Areas and residents' groups – such as the Lee Manor Society – in the process. They are often the only local organisations with the resources and focus to make a strong case against bad schemes. The loss of the fortnightly Amenity Societies Panel has reduced their ability to interact with planners and diminished the quality of local input to planning decisions. Self-congratulatory mention is made in the plan of the Design Panel, comprising professional architects. This is a useful body but, we 3 have found, can lack awareness of the local context provided by conservation groups. We see no mention of the role of conservation areas in the planning mix despite their important role in preserving local character and heritage. We hope this is because nothing in the plan will change or reduce their ability to fulfil this role.	<p>Noted. The draft Local Plan Policy QD1 makes clear that applicants should work closely with local communities and others likely to be affected by new development.</p> <p>In addition, the Council's adopted Statement of Community Involvement sets out the procedures for consulting the public on planning decisions, including planning applications.</p> <p>The draft Local Plan Part 2 policies on Heritage address conservation areas and the need to preserve or enhance their significance.</p>	Local Plan amended to make reference to role of residents' groups and amenity societies in supporting the plan's implementation.
Lewisham Pedestrians	2	QD 01	<p>Principles for determining planning applications – the Local Plan</p> <ul style="list-style-type: none"> • Developments should be permeable for people walking – this means increased permeability so that residents are given access in all directions that have now, or may reasonably have in the future, access to the public realm. • Maintain at least 60mm kerbs to separate pedestrians from vehicles (including bicycles) with white painted tops. This not only re-enforces safe separation but also helps younger children, people with vision-impairment and dogs to identify the kerb edge. 	<p>Noted. The draft Local Plan Part 2 design policies clearly set out the need for the movement and connective function of the public realm to be addressed to ensure that development provides for coherent relationships and good connections within and between sites and neighbourhoods, as well as public transport, and maximises opportunities for creating new connections.</p> <p>The draft Local Plan sets out requirement for development to ensure inclusive and safe design for people of all backgrounds, abilities and age groups. For example, this is addressed by draft Policy QD1 Delivering High Quality Design, QD2 Inclusive and safe design and QD3 Public realm.</p>	No change.
London Wildlife Trust	2	QD 01	We welcome and support, this policy especially references under Parts Da and J, and M. On the latter (and supporting para 5.10), of matters pertaining biodiversity, we recommend that applicants of development proposals above a certain scale or likely impact on a SINC should engage with the Lewisham Biodiversity Partnership.	Support noted.	Local Plan policy GR03 amended with additional criterion to encourage major development proposals adjacent to a SINC site, or with the potential to affect one, to engage with the Lewisham Biodiversity Partnership.
NHS (HUDU)	2	QD 01	<p>QD1 Delivering High Quality Design in Lewisham</p> <p>This policy is supported as a whole. However, we suggest Clause Ge explicitly refers to the internal quality of buildings and to the wider development. The policy is positively worded</p>	Support noted. Draft Local Plan Policy QD1 is considered sufficiently robust and worded to ensure health and well-being considerations apply to all buildings and spaces, whether indoor or outdoor.	Local Plan updated to include a new standalone

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

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

			<ul style="list-style-type: none"> The illustration on page 193 shows a particularly unsatisfactory infill development which, in our view, should be avoided as it can hardly be said to articulate with or complement the properties on either side. We refer in paragraph 65 to some examples of new build which could be used as examples. Further examples are illustrated in paragraph 129. 		
Telegraph Hill Society	2	QD 01	We are extremely worried that such illustrations will be taken as indicative of what is considered to be “good” design, accepting again that some people may think it is. Either a broader range of illustrations needs to be given or, and this may be preferable given the size of the document, all illustrations should be removed. If illustrations are to remain, a caveat should be given that they do not necessarily represent best practice.	Noted. The photos included in the draft Local Plan are provided for illustrative purposes only and do not carry material weight for planning decisions. As the plan is progressed through the next stages of the process, the Council may take the opportunity to update these, subject to resources available.	No change.
Telegraph Hill Society	2	QD 01	We support QD1.A to QD1.D .	Support noted.	No change.
Telegraph Hill Society	2	QD 01	QD1.H The design of a new development should pay attention to any impact on traffic flows and volumes in the surrounding neighbourhood. Particularly where parking is limited the design must ensure it does not impact adversely on the amenities of the surrounding area through overflow parking.	<p>Noted. These matters are addressed in draft Local Plan part 2 section on Transport and Connectivity. The plan must be read as a whole for planning decisions.</p> <p>In general, the draft Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plan ambitions.</p>	No change.
Telegraph Hill Society	2	QD 01	5.6 states “We will work positively and proactively with development industry partners and other key stakeholder [sic] to secure the delivery of high quality design in Lewisham.” The Glossary does not define key stakeholders. The definition should make it clear that existing residents are key stakeholders. See our comments the need for the involvement of communities at paragraph 11 and paragraphs 260 to 263 and 266 to 267)	<p>Noted. The draft Local Plan Policy QD1 makes clear that applicants should work closely with local communities and others likely to be affected by new development. In addition, the Council’s adopted Statement of Community Involvement sets out the procedures for consulting the public on planning decisions, including planning applications.</p> <p>To aid with clarity, paragraph 5.6 will be deleted from the plan.</p>	<p>Local Plan amended to delete policy supporting text paragraph 5.6.</p> <p>A new reference to the adopted Statement of Community Involvement (SCI) is included as an informative regarding Council’s procedures for consulting the public on planning decisions.</p>
Telegraph Hill Society	2	QD 01	5.8 – 5.9 We note that, in the context to our concern above, there is no commitment in this paragraph to re-starting the Amenity Societies Panel when funds are available. Whilst it is necessary to have professional design experts it is also just as	Noted. The draft Local Plan Policy QD1 makes clear that applicants should work closely with local communities and others likely to be affected by new development.	Local Plan amended to make reference to role of

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

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

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

Home Builders Federation	2	QD 03	<p>QD3 Public realm and connecting places</p> <p>We note the requirements of Part G. The Council will need to clarify how these requirements (such as public toilet conveniences and water fountains) will be paid-for in the longer term. Part L of the policy makes a general statement that this could be funded through developer contributions or legal agreements, but this may not be feasible in the future especially if we move towards an infrastructure tariff (as proposed by the Government’s Planning White Paper and the Planning Bill). It could be the case that the developer will only be expected to pay a tariff, but long-term maintenance will be the responsibility of a management company or the Council especially if the public realm is expected to be open to the public.</p>	Noted. Maintenance arrangements will be considered on a case-by-case basis, having regard to extant planning policy and legislation. As set out in draft Policy QD3, the expectation is that this will be funded through developer contributions or legal agreements. This may also include scope for assigned management companies.	No change.
Lee Forum	2	QD 03	Public realm should ensure pedestrians have sufficient space available, are protected from road users and wheeled users in the public realm and importantly are protected against harmful road and building pollutants through design and green screening.	Noted. These points are addressed in the draft Local Plan policies QD3 public realm and TR3 Healthy streets as part of healthy neighbourhoods, which include reference to the Healthy Streets approach. Policy QD3 will be amended with an additional criterion around space for users.	Local Plan policy QD3 amended to include an additional criterion on widening pavements.
Lee Forum	2	QD 03	The online session raised the point that pedestrians don’t have their own strategy; public transport, traffic and cycling do, yet more journeys are taken by foot than by other means. The Local Plan needs to detail what are the standards for pavements and space, safe crossings, cyclists and e scooters, pavement parking and other obstacles like retail bins on pavements? We would like to see a pedestrian strategy designed and included in the local plan.	<p>Noted. The Local Plan will help give effect to the London Plan objective for 90% of journeys in inner-London to be made by walking, cycling and the use of public transport. The promotion of sustainable transport modes are central to the Local Plans ambitions and policies and are set out clearly in Part 2 Transport policies, as well as the High Quality Design policies, including QD3 public realm.</p> <p>The Government Department for Transport has published the Manual for Streets, which is considered good practice guidance for street design and the public realm. It is acknowledged that the plan could benefit with a reference to this.</p>	Local Plan policy QD3 supporting text amended to refer to Manual for Streets.
Lewisham Pedestrians	2	QD 03	<p>Principles for determining planning applications – the Local Plan</p> <ul style="list-style-type: none"> • Service boxes (including EV charging facilities) should not be located on the footway. • Larger developments should design-out crime by ensuring that all public spaces are overlooked from commonly used windows in dwellings. This may impact, for example, on the use of ground floor accommodation being used far more extensively for residential use rather than service, commercial or storage. This arrangement will encourage people to walk to, from and within developments. 	These detailed comments are beyond the scope of the Local Plan and will be passed on to our Highways team.	No change.

			<ul style="list-style-type: none"> • Safety lighting should only use lighting columns placed on the footway as a last resort. Where an applicant uses this last resort then they must show that comfortable widths for people walking have been maintained. • Footways on new developments should be demonstrably wide enough to allow two people to walk alongside each other, wheelchair users and buggies to pass and for people to comfortably pause and linger without feeling as though they are obstructing others. • The government have recently announced that the new cycling and walking infrastructure strategy (CWIS 2) will reflect the new policies outlined in <i>Gear Change</i> and <i>LTN 1/120</i>. Significantly this will mean that “cyclists are vehicles” and that “cyclists and pedestrians should not share the same spaces”. These principles should inform the Local Plan and should apply to all shared public and private realms. • There should be a clear and well maintained dedicated pedestrian route from primary building entrances to the footway in the public realm. This should apply equally to small and large developments. Hard standing storage for motor vehicles should not be considered as part of a pedestrian route. 		
London Wildlife Trust	2	QD 03	<p>We welcome and support this policy, especially the reference to greening under H). However, it will be useful to define what ‘public realm’ means; that set out in supporting para 5.19 gives suggested typologies, but it we presume it is largely ‘grey’ hard surfaced space as opposed to predominantly green vegetated spaces (many of which are also public).</p>	Support noted. Public realm is defined in the first paragraph of the policy supporting text.	No change.
Make Lee Green	2	QD 03 TR 03	<p>Action for Pedestrians</p> <p>In Lee Green we would like to see the following principles applied to all new developments so that walking is enabled and encouraged.</p> <ul style="list-style-type: none"> - Gear Change and LTN 1/20 include bicycles as vehicles and that cyclists and pedestrians should not share the same spaces - this new guidance should apply to all shared public and private realm. - Maintain at least 60mm kerbs to separate pedestrians from vehicles (including bicycles) with white painted tops. This not only re-enforces safe separation but also helps children, people with vision-impairment and dogs to identify the kerb edge. - Developments should be permeable for people walking – this means increased permeability so that residents 	These detailed comments are beyond the scope of the Local Plan and will be passed on to our Highways team.	No change.

			<p>are facilitated in walking in any direction from development.</p> <ul style="list-style-type: none"> - Minimise the amount of hard surface and maximise natural, planted areas in order to reduce rainwater runoff into the waste water system. - Place all residential parking to the edges so that if private vehicle ownership declines then that space can be re-purposed as green space - "Easy to live in and difficult to drive in" should be adopted by the designers - or "better for people and better for the planet". - Residential and commercial waste should not be stored on the footway at any time. - Designers should read and understand the Create Streets document "The bin-lorry effect" and reduce the amount of space given over to service functions. - Lighting columns should be placed so the footway maintains comfortable widths for people walking. - Service boxes should not be located on the footway. - Footways on new developments should be wide enough to allow two people to walk alongside each other, wheelchair users and buggies to pass and for people to comfortably pause and linger without feeling as though they are obstructing others - Each off-street motor vehicle parking space must have electric vehicle charging functionality (the current plan is for a rather poor 20%). 		
Telegraph Hill Society	2	QD 03	QD3 should ensure that public realm improvements look attractive and integrate into the surrounding streetscape.	Noted. This matter is considered to be suitably addressed by draft Local Plan Policy QD3, particularly QD3.B which provides a cross-reference to Policy QD1 and the design-led approach	No change.
Telegraph Hill Society	2	QD 03	To meet the aspirations of the Vision that Lewisham should be a desirable place to live there is an overriding need to pay attention to our existing public realm as well as to new development.	Agreed. The Local Plan will be used as both a tool to assess new planning applications and as a strategy to support investment locally. High quality public realm is a key element of the draft Local Plan.	No change.
Telegraph Hill Society	2	QD 03	In order to address the points in paragraphs 83 and 84 in detail, the Council should prepare Streetscape policies for the Borough which apply both to new developments and to the works carried out on the public realm by the Council. The Borough had developed a Streetscape guide but this is no longer adhered to. An updated version of this should be introduced as soon as possible, with the commitment to do so referenced in the Local Plan.	Noted. The Government Department for Transport has published the Manual for Streets, which is considered good practice guidance for street design and the public realm. It is acknowledged that the plan could benefit with a reference to this.	Local Plan policy QD3 supporting text amended to refer to Manual for Streets.
Transport for London	2	QD 03	In QD3 (B, C and E), we also welcome references to a design-led approach (QD1) to create a vibrant public realm. References to TR3 Healthy Streets and the integration of existing and planned public transport infrastructure are similarly welcomed.	Support noted.	No change.
	2	QD 04	Local Plan Objections / I already wrote in with some objections and comments. I wish to add some here.	Noted. The London Plan policy D12 addresses with Fire Safety, which all new development proposals must have	Local Plan amended to include a target

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

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

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

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

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

		<p>housing for all those families living in overcrowded conditions or on the waiting list, add to the pressure on the overcrowded trains and rail platforms at the two Catford Stations, and add to more people living in an area with appallingly poor air quality.</p> <p>We have been very disappointed by the very poor quality of design of Lewisham Gateway. The replacement of the previous roundabout with a new set of junctions seems to have led to worse traffic jams than before, buses stacked up trying to get through, a terrible pedestrian experience with desire lines ignored, awful wind tunnel effects on occasions and a complete failure to improve the rivers running through the scheme which remain immured in concrete and barely visible and contributing nothing to improving the opportunities for wildlife and biodiversity, never mind there being no green space just some paving and a few random planters. If this is the standard of what is to come in Catford then we will be objecting vigorously.</p> <p>In considering high density sites and whether tall blocks are acceptable you should actively encourage the use of perimeter blocks or mansion block styles, as well as terraced housing which all achieve very similar densities and are more people friendly especially if combined with significant areas of green usable public open space and play areas aimed at various age groups.</p> <p>You should also bear in mind the tragic Grenfell fire and its causes. Most tower blocks were built with a 60 year life, or even shorter in the case of office blocks, with poor thermal insulation and the use of a variety of cladding systems. A lot of the previous residential towers were built by local authorities in the 60's and 70's under a system where the government would only allow them to borrow to build units of this type. Many suffered from very poor insulation, water ingress, poor systems building techniques and failing cladding. Recladding them to try to tackle some of these problems and make them look 'prettier' led to Grenfell. A lot of the new residential towers appear to utilise office block building techniques with concrete cores and frames and cladding panels bolted on or the use of steel frames, both with a very high level of embedded carbon. If a high proportion of these flats are for sale and the buyers expect to have a 99 year lease on a building which probably has a shorter shelf life or needs remedial work or re cladding after 40 or 50 years, what then?</p> <p>At the very least the planning system needs to ask very firm questions through policies about the life span of the building etc. Grenfell has shown how the current system of building</p>	<p>Both the London Plan and the draft Local Plan Policy QD4 set policies for the design of tall buildings, which include considerations for visual, functional, environmental and cumulative impacts.</p> <p>The draft Local plan Policy QD6 Optimising site capacity emphasises that the optimal capacity of a site does not mean the maximum capacity. Accordingly, the promotion of higher density development in appropriate locations does not imply that tall buildings are necessary. Higher density can be delivered through a wide range of site layouts and building typologies, including mid-rise developments that are reminiscent of historic mansion blocks but with modern specifications.</p> <p>The London Plan policy D12 addresses with Fire Safety, which all new development proposals must have regard to. There are also Building Regulations covering fire safety.</p>	
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			regulations and approved inspectors is not fit for purpose and cannot be relied on.		
Culverley Green Residents Association	2	QD 04	<p>There's no acknowledgement of any lessons learnt from the towers of Lewisham</p> <p>Lewisham Council needs to rebuild its credibility in managing development projects. This is not just because of the development in Lewisham but also other planning controversies, such as Millwall and the missing footbridge at Catford Green/Doggett Road. Everyone I have spoken to about the new towers in Lewisham thinks it is terrible. This may not be your view, but either way there must be some lessons (what went well, what didn't go well) you've learned that will inform how you will manage future developments. Simply ignoring what has happened in central Lewisham gives a strong impression that this is not a reflective organisation and we should not pay much attention to the Council's promises.</p>	<p>Noted. The draft Local Plan sets out a revised suite of policies and approaches to managing new development, including tall buildings. That draft plan has been informed by new evidence and studies, such as the Lewisham Characterisation Study and Tall Buildings Study.</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. See M&C report for further details.</p>	No change.
Deptford Society	2	QD 04	<p>Page 107 QD4 (Tall buildings). No explicit mention is made of the need to assess the impact of very tall buildings on pedestrian comfort in terms of the wind microclimate. We would like to see this incorporated as a requirement for new developments over a certain height and particularly where clusters of towers are proposed. Creating a pleasant and comfortable public realm is particularly important where residents have no outdoor space within the block.</p> <p>Existing guidelines on wind-tunnel testing are inadequate and geared towards super-tall buildings only. They fail to recognise the negative street level impact of moderately tall towers. Lewisham could impose its own more stringent requirements.</p> <p>The standard developer tower model seems to be accepted as a <i>fait accompli</i>. There are other solutions. Perimeter block development requires more design effort, but can deliver much better housing (and places) at similar densities.</p> <p>QD4 F(e) states that tall buildings should make a 'positive contribution' to the skyline. We question whether it is possible to assess this objectively and what criteria will be used to do so.</p>	Noted. Both the London Plan and the draft Local Plan Policy QD4 set policies for the design of tall buildings, which include considerations for visual, functional, environmental and cumulative impacts. The policies provide for the assessment and consideration of microclimate.	No change.
Deptford Society	2	QD 04 Figure 5.1, 5.2	Page 111 QD4 This map shows the Deptford Conservation area as suitable for new tall buildings- even though the diagram on the following page clearly identifies Conservation areas as more sensitive areas for tall building development. Why is the Deptford High Street and St Paul's Church CA not assigned the same sensitivity as the Telegraph Hill and Brockley Conservation Areas, especially given that it contains one of only two Grade I listed buildings in the borough?	Noted. The Tall Buildings sensitivity map (Figure 5.2) has been derived through the application of a number of variables, which include but are not limited to listed buildings and Conservation Areas. This will result in variances in sensitivity across the Borough. The draft Local Plan proposes that the tall buildings locations suitability map must be read together with the sensitivity map.	No change.
Greater London Authority	2	QD 04	<p>Tall Buildings</p> <p>Local Plan Policy QD4 should be clarified: It is unclear what the height would be for specific localities, as this is set out as 'significantly taller than the prevailing height of buildings in the</p>	Noted. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with more detailed requirements on

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

			<p>category areas where structures of say of less than 18 metres would be entertained, subject to details. This could help increase the supply of housing, especially on smaller infill sites near the train stations on high streets and in town centres not yet included in figure 5.1.</p> <p>Part G requires that tall buildings are delivered through a masterplan process in order to ensure that they are appropriately located both within a site and wider locality, designed to a high quality and effectively managed. We question whether a master-plan should be required for <u>all</u> tall-buildings, especially those that fall within the definition of Part D (b). These could be fairly modest proposals, such as a scheme for nine dwellings arranged over four stories but in an area that is generally of two storey character. We recommend that the Council reconsiders this requirement for areas in sub-locations for taller buildings up to 18 metres as we have suggested.</p>		
Lee Forum	2	QD 04	<p>We consider the plan needs to assert that once approval is granted there can be no expectation of post planning consent to alter plans and water them down leading to a poorer public realm and higher heights. The issue of post approval changes is not mentioned anywhere in the Plan.</p>	<p>Noted. Where planning consent has been granted, variations to the consent will be considered having regard to the development plan policies, and through the planning approval process. This is notwithstanding Permitted Development rights.</p> <p>The introductory section of the draft Local Plan sets out how the plan will be used for planning decisions, in line with national planning policy and legislation.</p>	No change.
Lee Forum	2	QD 04	<p>2. There is no definition of what constitutes a tall and a taller building in different locations. Robert Jenrick required the London Plan to be changed in January 2021 such that Boroughs define this in their Local Plans and we request that this be done.</p>	<p>Noted. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.</p> <p>The Tall Buildings Study update and amendments to the draft Local Plan have taken into account outcomes of the London Plan examination and publication plan.</p>	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.
Lee Forum	2	QD 04	<ul style="list-style-type: none"> The London Plan states tall buildings are anything that is 'substantially taller than their surroundings and causes a significant change to the skyline'. It also states that boroughs must consider things like local transport and infrastructure when deciding where it is appropriate for tall buildings. Fig 5.1 shows that Lewisham has assessed its evidence on the suitability of Lee Green for tall buildings and determined that tall buildings are not appropriate in the Lee Forum area. The online session publicly stated that in areas not meant for tall buildings, building would not be allowed more than 1 floor higher than the existing tallest building (NOT 1 – 2 floors higher than a prior planning application). At the online consultation we were also told that height will be determined on a case by case basis taking account 	<p>Noted. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.</p> <p>The Tall Buildings Study update and amendments to the draft Local Plan have taken into account outcomes of the London Plan examination and publication plan.</p>	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.

			<p>of the context of the site and its surroundings, particularly the height of surrounding buildings and local views We hope that the council will demonstrate its commitment to these principles. Please refer to East area comments later for a more detailed view with regard to the forthcoming development at Leegate.</p> <ul style="list-style-type: none"> The 2019 Lewisham Characterisation Study page112 states 4.4.99 The examples of tall residential buildings in Lewisham typically date from the 1960s. Whilst they vary in height and form they are typically between ten and fifteen storeys tall although exceptions which exceed this include the three towers on the Pepys Estate in the north of the borough. The height of these buildings is not in keeping with the surrounding scale and should not be used as a justification for taller buildings in the future. The draft local plan page 109 states '5.34 Proposals for taller buildings assessed against Policies QD4 (A) and (B) must demonstrate a clear understanding of the site context, including the historical pattern of development in a locality. The reference point for the prevailing height of buildings or structures will vary on a case-by-case basis, even within a neighbourhood or locality. Not all existing tall or taller buildings will be appropriate references for new development. For example, some tower blocks built in the 1960s and 1970s detract from the historical townscape features within a neighbourhood, and are today considered not to make a positive contribution to local character. Furthermore, the cumulative impact of taller buildings within a site or locality will be an important consideration'. We agree that the 1960s anomalous tall buildings are not a guide for existing local height in an area and that the Leybridge Estate should not be used as such guide. 		
Lee Forum	2	QD 04 Section 06	<p>We would like much stronger and specific wording included in the Local Plan around tall buildings and heritage assets. This wording used by Hounslow in its Great Western Corridor Masterplan and Capacity Study is the kind of wording that should be used. Here are some quotes from that plan: " 'Where the height differential between areas with different height approaches is more than two storeys, the abrupt change in height creates an imbalance and breaks the coherence of the urban fabric". "Higher development may feel domineering and undermine the integrity of buildings with lower height". "Generally heights should overcome strong height differentials through the stepping down of development at the interface with public realm". "Buildings may have one or two set-back storeys behind the main frontage. Due to their limited visibility from the street space set-back storeys have little impact on the perceived building height or enclosure of the street space". "The approach is to promote mid-rise buildings rather than very tall buildings, as</p>	Noted. Following consultation on the Regulation 18 draft Local Plan, the Council has undertaken additional work on the Tall Buildings Study, which has informed the Regulation 19 document.	Local Plan amended with more detailed requirements on buildings heights, informed by the Tall Buildings Study update.

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

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

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

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

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

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

			than that set out in section 15 of this Plan for the Hatcham Works site (page 603), the proposed 912 net residential units will still require extremely tall towers well beyond those felt suitable for the site by residents living in the surrounding area and affected by any development on the site. The full survey results are given in Appendix 2 to this paper.		
Telegraph Hill Society	2	QD 04	<p>In summary: By making such substantial changes to the local area, it arguably will also not reinforce community cohesion or integration and would also be contrary to Strategic Objectives B3 and G18.</p> <ul style="list-style-type: none"> • High PTAL alone is not a justification for tall buildings on any site • High-rise developments generally do not meet Strategic Objectives B3, B4 or G16 to G18 • Significantly increasing the population of the area is ethically unacceptable until the issues of health and well-being are resolved • There is insufficient green space to support a significant increase in residential capacity in an area which is deficient in such space • The plan (figure 5.2) is misleading as to tall building sensitivity requirements as the area is extremely sensitive to such buildings and • The heritage of the surrounding Conservation Areas would be irretrievably damaged by the creation of such towers as the illustrations above clearly show. <p>The allocation of the Hatcham Works site for tall towers is contrary to Strategic Objectives A1, D8, F13, F15 and G16. By making such substantial changes to the local area, it arguably will also not reinforce community cohesion or integration and would also be contrary to Strategic Objectives B4 and G18.</p>	<p>We appreciate that the level of growth within some areas of the borough will be a step change in density from the existing character. However the council is responding to a housing crisis and the need to respond to London Plan requirements in terms of housing targets and making best use of available land within the capital.</p> <p>The spatial strategy for the borough focuses this growth in Opportunity areas and town centres that have good access to public transport, jobs and local services. We consider this a sensible and sustainable approach to meeting this challenge.</p> <p>Proposals for development will be assessed through the development management process against the relevant policies including those on Heritage.</p> <p>We do not consider that high-density development in sustainable locations contradicts the strategic objectives.</p>	No change.
Telegraph Hill Society	2	QD 04	For all the reasons given above we do not believe that the Hatcham Works site is suitable for tall buildings and believe it should be scoped out of figure 5.1 . The indicative development capacity in the site allocation on page 603 would need to be reduced accordingly	<p>The indicative capacity of the former Hatcham Works site reflects the massing and detailed masterplanning done through the New Cross Gate area Framework.</p> <p>The site is a highly accessible site and suitable for high-density development.</p>	No change
Telegraph Hill Society	2	QD 04	For other reasons (not related to height) as to why the Hatcham Works site could be better used to improve the lives of residents and to meet the Borough's vision of a welcoming series of communities, see our proposals on the use of the site as retail (paragraphs 169 to 171) and creative employment (paragraph 157), together with low-rise accommodation and a park (paragraph 48). These move the current designation of High Street into a more pedestrian and cycle-friendly area than the A2 will ever be and address the lack of green space and	<p>The indicative capacity of the former Hatcham Works site reflects the massing and detailed masterplanning done through the New Cross Gate area Framework.</p> <p>The site is a highly accessible site and suitable for high-density development.</p>	No change.

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

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

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

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

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

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

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

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

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

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

			be permitted under the SDG, where the use of the phrase “ <i>only support</i> ” is absolutely required.	previous applications are outside the scope of the Local Plan.	amended as suggested, to better align with remainder of policy.
Telegraph Hill Society	2	QD 10	It is extremely unfortunate that the illustration given in the draft Plan does not show a good example. The windows in the extension clearly do not respect the originals (modern possibly uPVC frame on the first floor far too wide for the window and a large plate glass window on the ground floor – whereas the original property, as can be seen, has smaller paned sash windows). This should not be used as an example for fear of setting a precedent. We would strongly urge you to find a better example and would be happy to provide you with some.	Noted. The photos included in the draft Local Plan are provided for illustrative purposes only and do not carry material weight for planning decisions. As the plan is progressed through the next stages of the process, the Council may take the opportunity to update these, subject to resources available.	No change.
Telegraph Hill Society	2	QD 10	We note that much of the material previously in DM Policy 31 is now reflected in the SPG, although we consider that the SPG is too widely drawn, allows for some inappropriate development particularly within Conservation Areas and is urgently in need of further refinement.	Noted. The Supplementary Planning Document is outside the scope of the Local Plan. The Council may in the future review and update SPDs to ensure guidance appropriate aligns with adopted Local Plan policies.	No change.
Telegraph Hill Society	2	QD 10	<p>We welcome the addition of new material on basement development and lightwells which have become a particular source of contention since the last UDP was introduced.</p> <ul style="list-style-type: none"> • There are, however, certain elements of DM Policy 31 which we consider still need to be reflected within this section of the Plan as follows: • Development proposals should response <i>sensitively</i> to the character rather than <i>positively</i> (QD10.B). • The express statement that “<i>Roof extensions on the street frontage of a building, particularly in a residential street will be resisted in favour of extensions to the rear of the building</i>” made in DM 31.2b should be retained. • The requirement that any proposal should retain 50% of the garden space (included in DM Policy 31.2c) is not expressly repeated in the SPD and should therefore be included in QD10. • The requirements in DM 31.2d are not expressly repeated in the SPD and should therefore be included in QD10: “<i>additional or enlarged windows, doors and other openings, should be in keeping with the original pattern, and in the case of a roof extension should reflect the existing alignment of the windows. Replacement windows where controllable by the Council should closely match the pattern of the original windows. The repair of original windows will be encouraged.</i>” 	Noted. Some of the suggested changes are considered to be appropriately captured by the draft Local Plan policies. However it is acknowledged that principles of the extant DM31 could be carried forward into the new plan, as suggested.	Local Plan amended to include new policy criteria on extensions, as suggested. These are principles in extant DM31 which are to be incorporated into the new plan.
	2	QD 11	5. We do not support in-filling gardens and alleyways. We do not want to live in claustrophobic areas with no breathing space. Gardens must be protected. There might be the occasional situations where it’s not a problem, but most of the time it would be unacceptable to build on gardens.	Noted. Permitted development rights are outside the scope of the Local Plan. The removal of permitted development rights would need to be addressed through an Article 4 Direction, which is also outside the scope of the Local Plan. QD11 makes clear that development on garden land should	No change.

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

			<p>It is the expectation of the London Plan that infill development and residential conversions, among other things, will provide an important source of the small site supply. Paragraph 4.2.4 of the London Plan states:</p> <p>Incremental intensification of existing residential areas within PTAL within 800m distance of a station⁴⁷ or town centre boundary⁴⁸ is expected to play an important role in contributing towards the housing targets for the borough set out in Table 4.2. This can take a number of forms, such as: new build development, residential conversions, redevelopment or extension of existing buildings, including non-residential buildings and residential garages. This results in net additional housing provision. These developments are generally supported where they provide well-designed additional housing to meet London's needs.</p> <p>The most effective way to increase delivery on small sites is for the Council to adhere to national policy and identify some through its Local Plan. It should identify small sites that are appropriate for residential development and allocate these. Many local authorities have land in their ownership, including a number of smaller plots, including carparks and vacant office buildings, that could be allocated to support the housing delivery on smaller sites. These should be allocated in the Plan. Suburban areas also contain many gaps where questions of landownership tend to be less complex than in town centres making it easier to allocate these.</p>		
HopCroft Neighbourhood Forum	2	QD 11	<p>The back garden development section also needs attention - back gardens often back on to woodland, railway corridors, abandoned allotments, green land held by holding companies - would they be included and how can the Local Plan protect against issues such as encroachment and land owners agreeing to Adverse Possession claims?</p>	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended to make reference to the Small Sites SPD.
Ladywell Society	2	QD 11	<p>Protection of gardens (greening the borough and the city) As much of the green “infrastructure” of the borough is in back and front gardens these should be protected. The paving over of front gardens should be discouraged and more environmentally-friendly methods encouraged (e.g. mesh which allows rain water to percolate through the parking area). Water run-off into the street and general drains can cause sewers to back up during periods of heavy rain.</p>	<p>Noted. Local Plan part 2 Green infrastructure states Development proposals should incorporate high quality landscaping and optimise opportunities for urban greening measures, including by incorporating high quality and species diverse landscaping, wildlife habitat, green roofs and walls, and sustainable drainage systems. Urban greening should be fully integrated into the design-led approach with consideration given to the site setting within the wider landscape, as well as the layout, design, construction and long-term management of buildings and spaces.</p> <p>In some cases, the council exercises no control over the paving over of front gardens due to permitted development rights.</p>	No change.

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

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

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

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

			and that such garden land is not defined as Previously Developed Land, as set out in the NPPF.”		
Lewisham Park Crescent Residents	2	QD 11	<p><u>Paragraphs 5.80 and 5.92 with regard to the explanation to QD11 – pages 141 to143</u></p> <p>1. Again, the wording in para 5.80 which seeks to explain the policy includes all the categories of land use covered by this policy grouped together. We would recommend that the reference to garden land is removed from the following passage</p> <p><i>“However, there may also be opportunities to make a more beneficial use of land through the redevelopment of smaller sites, such as backland and infill sites, <u>as well as garden land and amenity spaces</u>”.</i></p>	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended to make reference to the Small Sites SPD.
Lewisham Park Crescent Residents	2	QD 11 Para 5.8	22. This passage is contrary to the aim of the policy to resist garden land development and ignores the fact that “garden land, including back gardens, make an important contribution to local character and amenity and often have ecological value”, para 5.89 refers here.	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.
Lewisham Park Crescent Residents	2	QD 11 Para 5.8	23. The reference to garden land in para 5.80 also risks implying that garden plots are suitable for new housing under the policy (HO2) for optimising the use of small sites. The provisions for the use of small housing sites refer to brownfield sites only as set out above in paragraphs 4 and 5.	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.
Lewisham Park Crescent Residents	2	QD 11 Para 5.9	<p>24.Para 5.92 states that</p> <p><i>“The loss of garden land will normally only be considered acceptable in exceptional circumstances, where sites can be assembled to bring forward comprehensive redevelopment in accordance with other local plan policies”.</i></p> <p>27. We would suggest that the wording here is amended to reflect the wording in QD11, G, so that para 5.92 reads</p> <p>The loss of garden land will normally only be considered acceptable in exceptional circumstances, where a number of whole land plots can be assembled to bring forward comprehensive redevelopment in accordance with other local plan policies.</p>	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.
Lewisham Park Crescent Residents	2	QD 11	<ul style="list-style-type: none"> That the reference to “<u>garden land (including back gardens)</u>” is taken out of the paragraph in QD11 A. 	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference

					to the Small Sites SPD.
Lewisham Park Crescent Residents	2	QD 11	<ul style="list-style-type: none"> That the wording in para 5.80 (<i>“However, there may also be opportunities to make a more beneficial use of land through the redevelopment of smaller sites, such as backland and infill sites, as well as garden land and amenity spaces”</i>) is changed to remove the reference to garden land. 	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.
Lewisham Park Crescent Residents	2	QD 11	<ul style="list-style-type: none"> That the reference to “The requirements of (A) above being satisfied are removed from QD11, G 	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.
Lewisham Park Crescent Residents	2	QD 11 HO 02	<ul style="list-style-type: none"> That the definition statement in paragraph 5.81 on page 141 with regard to garden land be reiterated in QD11 and HO2. “Garden land (including back gardens) comprises private amenity areas that were the entire back garden to the rear of a dwelling or dwellings as originally designed and that such garden land is not defined as Previously Developed Land, as set out in the NPPF. 	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.
Lewisham Park Crescent Residents	2	QD 11	<ul style="list-style-type: none"> That the guidance in paragraph F on page 140 of QD11 is clarified with the addition of the following suggested text <p style="margin-left: 40px;">Garden land makes an important contribution to the character and amenity of Lewisham’s neighbourhoods, and often has biodiversity value. The use of garden land for new development should therefore be strongly avoided <i>in favour of development opportunities elsewhere in the Borough, particularly on brownfield sites and previously developed land.</i></p> 	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.
Lewisham Park Crescent Residents	2	QD 11	<ul style="list-style-type: none"> That the wording in paragraph 5.92 is changed to incorporate the wording in bold below The loss of garden land will normally only be considered acceptable in exceptional circumstances, where a number of whole land plots sites can be assembled to bring forward comprehensive redevelopment in accordance with other local plan policies 	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.
Lewisham Park Crescent Residents	2	QD 11	<ul style="list-style-type: none"> That additional protection is given to garden land in conservation areas so that it is made clear that developments on garden land in conservation areas will not be granted planning permission. 	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference to the Small Sites SPD.
London Wildlife Trust	2	QD 11	We welcome and support the policy, especially parts F and G. However, no precise definition of garden land is set out in the supporting text (other than it is land associated with housing, as referenced too in the Glossary (p817)), perhaps being	The Council has provided further guidance with the now adopted Small Sites SPD.	Policy amended for clarity and to make reference

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

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

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

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

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

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

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

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	2	SD	<p>SELCHP</p> <p>SELCHP is proposed as an integral part of the Local Plan. Waste incinerators are usually located in the most deprived neighbourhoods this is socially unjust. Furthermore, by 2035, incineration will be a more carbon-intensive process than even landfill. Remove SELCHP as a priority and shut it down so the borough can meet its climate emergency targets.</p>	<p>The London Plan sets out the strategic approach to achieve net waste self-sufficiency (i.e. the equivalent of 100 per cent of London’s waste should be managed within London by 2026). It requires that the Council, through the Local Plan, identifies and safeguards waste sites/facilities in order to meet the borough’s apportioned tonnage of waste. SELCHP plays an important role in helping the borough to meet its London Plan waste apportionment figure. For the time being, the Local Plan must therefore continue to safeguard the site for waste management uses.</p>	Local Plan amended to include a new policy point which seeks to improve the environmental performance of existing waste management facilities.
	2	SD	<p>GREEN: Rather than encourage green roofs, which can be abandoned, not watered and look a mess, even cause damp penetration, I think it would be wiser to have realistic grants to install solar panels, Grants for private homes, but also a rule that all new developments have to adhere to.</p> <p>There are certain solar panel arrangements than can make the subsequent sale of a property a problem. So proper one-off grants would be best. Whatever percentage of the building’s needs are catered for by the solar panels, will reduce the need for electricity from the grid. Even if it only for the provision of communal lighting. Compound this over the whole borough and it adds up.</p>	<p>The Local Plan broadly supports and promotes the use of sustainable design measures, such as green roofs and solar panels. However, grant funding for these measures is outside the scope of the plan.</p>	No change.
	2	SD	<p>I am contacting you with regards to the Lewisham Local Plan and the adjustments I would like to see made to bring it into alignment with the Lewisham Climate Emergency Strategic Action Plan.</p> <p>1 - Investment in Green jobs and apprenticeships.</p> <p>If Lewisham is to have a “A thriving local economy that tackles inequalities” then local people need to be trained in jobs for the future. Government funding should be taken advantage of to achieve this and industries beyond energy and construction must also be considered such as city farming, communal composting and environmental education.</p> <p>2 - A well connected borough.</p> <p>Our local economy will only thrive if the borough is well connected with routes that are accessible and un-congested. New developments must be “car-capped” and support for motor vehicle free households must be prioritised.</p>	<p>Noted. Overall it is considered that the Local Plan provides for a holistic and integrated approach to delivering Good Growth over the long term in line with the London Plan and the principles of sustainable development set out in the NPPF.</p> <p>The Local Plan sets out sustainable design and construction policies which are considered to be in conformity with the London Plan. Whilst the Council would broadly support proposals that meet the Passivhaus standard, it is considered that requiring this standard for all new developments would not be financially viable, and therefore present soundness issues with respect to the NPPF.</p>	<p>Local Plan has been amended to address points raised including:</p> <p>Strategic objectives amended to signpost support for development of green industry along with transition to a low carbon,</p>

			<p>Implementing actively enjoyable “active-travel” solutions is an essential part of this process.</p> <p>3 - Future proof developments, including embodied carbon. Housing and developments in the borough must work for the residents, not the developer. Granting planning permission ONLY to those who meet the “Passivehaus” standard will ensure that these developments are fit for the future. As a voluntary standard, Lewisham would be leading by example, something that in itself would be beneficial to the borough. Embodied carbon must also be included in the environmental impact of development and maintenance.</p> <p>4 - An holistic approach to development in the borough. Transport, jobs and housing are all connected issues, and must be considered as such in all future developments. An holistic appreciation of these complex needs will help build resilient and sustainable communities for generations to come.</p> <p>5 - Adoption of more ambitious and authoritative language. Though the sentiment of the plan is ambitious, it is undermined by consistently weak and ambiguous language, leaving far too much open for negotiation by developers whose priority will always be profit. If the plan is to genuinely work for the people of Lewisham, it must be revised to be more precise and definitive.</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>	<p>The Local Plan will be amended to address a number of the points raised and strengthen the alignment with the Council’s Climate Emergency Action Plan.</p>	<p>circular economy.</p> <p>Parking standards amended to align with the London Plan requirements for car-free and car-lite development.</p> <p>Additional policy to emphasise the importance of sustainable retrofitting of existing building stock, along with encouraging major developments to calculate and address non-regulated carbon emissions (including embodied carbon).</p> <p>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”.</p>
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	2	SD	<p>I am contacting you with regards to the Lewisham Local Plan and the adjustments I would like to see made to bring it into alignment with the Lewisham Climate Emergency Strategic Action Plan.</p> <p>1 - Investment in Green jobs and apprenticeships. If Lewisham is to have a “A thriving local economy that tackles inequalities” then local people need to be trained in jobs for the future. Government funding should be taken advantage of to achieve this and industries beyond energy and construction must also be considered such as city farming, communal composting and environmental education.</p> <p>2 - A well connected borough. Our local economy will only thrive if the borough is well connected with routes that are accessible and un-congested. New developments must be “car-capped” and support for motor vehicle free households must be prioritised. Implementing actively enjoyable “active-travel” solutions is an essential part of this process.</p> <p>3 - Future proof developments, including embodied carbon. Housing and developments in the borough must work for the residents, not the developer. Granting planning permission ONLY to those who meet the “Passivehaus” standard will ensure that these developments are fit for the future. As a voluntary standard, Lewisham would be leading by example, something that in itself would be beneficial to the borough. Embodied carbon must also be included in the environmental impact of development and maintenance.</p> <p>4 - An holistic approach to development in the borough. Transport, jobs and housing are all connected issues, and must be considered as such in all future developments. An holistic appreciation of these complex needs will help build resilient and sustainable communities for generations to come.</p> <p>5 - Adoption of more ambitious and authoritative language. Though the sentiment of the plan is ambitious, it is undermined by consistently weak and ambiguous language, leaving far too much open for negotiation by developers whose priority will always be profit. If the plan is to genuinely work for the people of Lewisham, it must be revised to be more precise and definitive.</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>	<p>Noted. Overall it is considered that the Local Plan provides for a holistic and integrated approach to delivering Good Growth over the long term in line with the London Plan and the principles of sustainable development set out in the NPPF.</p> <p>The Local Plan sets out sustainable design and construction policies which are considered to be in conformity with the London Plan. Whilst the Council would broadly support proposals that meet the Passivhaus standard, it is considered that requiring this standard for all new developments would not be financially viable, and therefore present soundness issues with respect to the NPPF.</p> <p>The Local Plan will be amended to address a number of the points raised and strengthen the alignment with the Council’s Climate Emergency Action Plan.</p>	<p>Local Plan has been amended to address points raised including:</p> <p>Strategic objectives amended to signpost support for development of green industry along with transition to a low carbon, circular economy.</p> <p>Parking standards amended to align with the London Plan requirements for car-free and car-lite development.</p> <p>Additional policy to emphasise the importance of sustainable retrofitting of existing building stock, along with encouraging major developments to calculate and address non-regulated carbon emissions (including embodied carbon).</p> <p>Local Plan amended to provide more</p>
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					authoritative language where possible. For example, by stating that development proposals “must” rather than “should” or “will be expected to”; and replacing “will be resisted” with “refused”.
	2	SD	<p>The approach to low carbon buildings is one example where the plan fails to deliver ambition commensurate with a Climate Emergency. Many building energy policies in the plan need strengthening, in particular, the requirement for major developments to achieve a 35% reduction against current building standards (SDC3on p.395) is particularly disappointing. National government has mandated a reduction of 31% in 2021 whilst the 2025 Future Homes Standard will require reductions of 75%. Given the Plan provides a framework to 2040, the current draft cannot be reconciled with a genuine desire to address the Climate Emergency. The current and future residents of Lewisham deserve new homes built for the 21st century. The housing crisis of today will not be solved by building homes unsuitable for tomorrow.</p> <p>Finally, whilst the Plan at least seeks to address the operational carbon emissions it remains completely silent on the embodied carbon emissions in new developments in Lewisham. The most energy efficient building could also be the highest carbon if the materials and techniques that it is built with release emissions at or prior to construction. A Lewisham plan which was serious about the climate emergency would not only address the carbon emitted to operate a building but also the carbon emitted to build it. The London Energy Transformation Initiative (LETI) have provided extensive guidance on this element of low carbon design and I would urge the council to adopt their design guide as an aspiration and ultimately a requirement for all Lewisham development.</p> <p>Even the best planning policies though are irrelevant without appropriate enforcement and planning practice. Many of the Lewisham Plan policies designed to limit carbon have “get out clauses” as in SD3 D where developers are invited to demonstrate that low carbon approaches are too expensive or not practical and pay for offsets instead. Currently this results in developments regularly being approved which will need</p>	<p>Noted. The draft Local Plan aligns with the London Plan which includes a zero-carbon target for major residential developments, and to major non-residential developments. To meet the zero-carbon target, an on-site reduction of at least 35 per cent beyond the baseline of Part L (‘Conservation of fuel and power’) of the current Building Regulations (2013) is required. Both the London Plan and Local Plan are subject to regular review, which will allow for updates in the future to ensure consistency with changes to national planning policy and legislation.</p> <p>The London Plan supports the inclusion of carbon-offset payment policies in boroughs’ Local Plans. The Local Plan is clear that carbon offset payments will only be accepted in exceptional circumstances, where the applicant clearly demonstrates that carbon reduction targets cannot be fully met on-site.</p> <p>Planning enforcement is outside the scope of the Local Plan.</p>	<p>Additional policy to emphasise the importance of sustainable retrofitting of existing building stock, along with encouraging major developments to calculate and address non-regulated carbon emissions (including embodied carbon). The LETI guidance signposted, as suggested.</p> <p>Local Plan amended with policy supporting text stating that offset payments should only be used as a last resort.</p>

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

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

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

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

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

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

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

Lewisham Green Party	2	SD	<p>We would propose that the default position in the Plan must be that the same high standards should apply to all developments, both major and minor; and that where exceptions are proposed, these should be dealt with through the process proposed below.</p> <p>3 SD 1-12 Exceptions must be truly exceptional</p> <p>It is accepted that there must be room for exceptions to be made to whatever standards are adopted. The Plan must have sufficient flexibility built in to respond to the unexpected and unforeseen.</p> <p>Throughout the lifetime of the plan, however, it must also be expected that the Council will be under pressure from a wide range of sources to modify the standards they are aiming to enforce to mitigate climate disaster. This will include pressure from developers whose margins might not be able to withstand the highest carbon neutral standards, thus leading them to say they cannot proceed with developments that otherwise would, indeed, be beneficial to the community; and pressure on the Council to accept lower carbon neutral standards in exchange for a higher number of affordable housing units which the Borough so sorely needs.</p> <p>It will be essential, however, that a succession of case by case exceptions do not, when looked at globally, constitute a fatal undermining of the overall intentions of the Plan.</p> <p>The same principles need also apply in respect of any proposal to offset carbon emissions (SD3D).</p> <p>To minimise the risk of the Plan’s strategic principles being so undermined, it is, therefore, proposed that a rigorous and transparent process be constituted to manage any request for exception to the standards set out in the Plan, which would include the following:</p> <p>any recommendation to apply a lower standard than that set out in the Plan, or to offset carbon usage, be approved by a Council Officer at least one grade higher than would otherwise be the case, up to the position of Chief Officer;</p> <p>whenever a recommendation is made for an exception, a list of all previous exceptions and offset decisions made by the Council under the Plan shall be appended, including also both the total square metres (or equivalent appropriate metric), for which planning permission has been granted and for which exception or offsetting had been given to date; and the</p>	<p>The Council is required to review the Local Plan every 5 years, and this will provide an opportunity to consider implementing new standards, taking into account the latest higher level policies, legislation and development viability information.</p> <p>It is not considered appropriate to maintain the same standards for major and minor development applications in all instances, as this may impact on the development viability of smaller schemes, and requirements may not be proportionate in scope for developments of that scale.</p> <p>With regard to carbon offsetting, the draft Local Plan makes clear that these should only be used in exceptional circumstances, however it is acknowledged that stronger wording around this could be included.</p> <p>It is also acknowledged that further information in the monitoring framework could be included on offset payments to better monitoring implementation of the policy over the plan period.</p> <p>As set out in planning law, planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise.</p>	<p>Local Plan amended to specify that carbon offsetting should only be considered as a last resort.</p> <p>Local Plan Part 4 monitoring framework amended with new monitor on amount of s106 funding secured through carbon offsets.</p>
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			<p>proportion of the total square metres for which approval has been given which that represents;</p> <p>a report is made annually the Mayor setting out the exceptions made and carbon offsetting permitted during the past twelve months.</p> <p>The number of exceptions should always be kept to a minimum.</p> <p>Discretionary decisions require a higher level of input from officers who are already hard pressed; and such decisions, once they have been made, can be far harder to successfully defend when appealed against appeal by developers, or if called in by Central Government.</p>		
Lewisham Green Party	2	SD	<p>8 SD1-12 Lapse in time between permission being given and completion of works</p> <p>The Local Plan is being developed in a very dynamic environment. As our society becomes more aware of range and scale of the problems posed by Climate Change, so standards and technologies are changing fast and the borderlines between what the public generally deems to be acceptable and unacceptable are shifting swiftly.</p> <p>The Planning process, however, is slow, albeit often for very good reasons. A negative aspect of that slowness, however, is that final permission for developments may not be granted until some years after the initial plans were submitted for approval; and the development, itself, may not start, let alone be completed, until many years after that.</p> <p>We would propose, therefore, that the Plan should recognise the difficulties that may be posed by the often extensive time period between submission of proposals and the completion on site and set out proposals as to how such problems could be mitigated.</p> <p>Where this might require powers additional to those the Council already possesses, those, too, should be clearly set out.</p>	<p>Noted. The period taken on decisions for planning applications is outside the scope of the Local Plan.</p> <p>The Council may consider the use of enforcement powers where new development is not built in accordance with a planning consent.</p>	No change.
London Borough of Southwark	2	SD	<p>It will be interesting to see how the plan responded to newly adopted Nationally Described Contribution of 78% by 2035 target for carbon emissions. Southwark would welcome further conversations on this issue.</p>	<p>The carbon reduction requirements for new developments are set by the London Plan, which are reflected in the draft Local Plan. The Local Plan states that these minimum standards may be subject to review and updating over the</p>	No change.

				plan period, for example, to respond to any changes in higher level policy and legislation.	
Make Lee Green	2	SD	<ul style="list-style-type: none"> - Buildings contribute half of all carbon emissions in Lewisham, the vast majority it from the existing building stock, yet the Plan is largely silent on this issue. - There should be a much greater focus on upgrading the existing building stock to improve energy efficiency and more to low carbon heating and electricity. - Planning policies should encourage on-site renewable heat and energy generation, such as rooftop solar and ground and air-sourced heat pumps - The same requirements for zero carbon buildings should apply to extensions as to new buildings. 	<p>The Council's evidence base confirms that existing building stock contributes significantly to carbon emissions in the borough. The Regulation 18 Local Plan document includes policies on sustainable retrofitting of existing building stock. However it is accepted that the plan can provide more emphasis and support for this.</p> <p>The London Plan sets out an energy hierarchy, which the Local Plan helps give effect to. New developments must apply the energy hierarchy to reduce carbon emissions and minimise energy demand. This may include renewable sources of energy.</p> <p>The Local Plan does not require building extensions to be zero-carbon. There are technical challenges to implementation and monitoring. This is because original building to which the extension is attached may not need to be zero carbon (e.g. in the case of older building stock).</p>	Local Plan amended to include additional policy to emphasise the importance of sustainable retrofitting of existing building stock, along with encouraging major developments to calculate and address non-regulated carbon emissions (including embodied carbon). A new reference to the LETI good practice guidance is also included.
Sydenham Society	2	SD	<p>We understand that the trends listed above will be explored during the forthcoming Examination in Public by the Planning Inspector. However, we wish to put on record the following points:</p> <ul style="list-style-type: none"> • There should be a greater emphasis in the Local Plan on retaining, refurbishing and retrofitting existing buildings. We support the approach taken by [name removed] & [name removed], the winners of the 2021 Pritzker Architecture Prize. Their philosophy is explained at pritzkerprize.com: <i>Skilful selection of modest materials enables the architects to build larger living spaces affordably... we never see the existing as a problem. We look with positive eyes because there is an opportunity of doing more with what we already have."</i> • The construction of new buildings (and their associated link roads and hard landscaping) is accelerating the climate emergency. Cement production now accounts for 8% of greenhouse gas emissions of which half is the result of burning carbonate rock and reducing it from calcium carbonate to calcium oxide and the other half is fossil fuel consumed to raise 	<p>Noted. The draft Local Plan includes a policy on the 'circular economy' which addresses this matter. The circular economy is an economic model in which resources are kept in use at the highest level possible for as long as possible in order to maximise value and reduce waste, moving away from the traditional linear economic model of 'make, use, dispose'.</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>	Local Plan amended to include additional policy to emphasise the importance of sustainable retrofitting of existing building stock, along with encouraging major developments to calculate and address non-regulated carbon emissions (including embodied carbon). A new

			<p>the temperature of a cement kiln to the 1,600 degrees C required to make cement.</p> <ul style="list-style-type: none"> • Steel, reinforced concrete, aluminium, glass and most modern building materials are all massive consumers of CO2. In contrast, traditional materials – brick, wood, lime plaster – have excellent thermal properties and avoid the need for mechanical ventilation. Traditional buildings have thermal mass, a stabilising influence on internal temperature and humidity, and particularly beneficial in the kind of hot summer weather the UK is experiencing due to global heating. • Lewisham has recognised the threat to human life posed by the climate emergency. Adopting a policy of retaining, refurbishing and retrofitting existing buildings will not only preserve local character and contribute to community well-being by reinforcing a “sense of place”, but will also help save the planet by reducing greenhouse gas emissions. • The imperative to reduce massively carbon dioxide emissions overturns all assumptions about progress that have featured in political discourse in recent decades. Both prosperity and personal freedom will be in short supply if London and the eastern half of the UK are under threat of being engulfed by a North Sea engorged with melt-water from vanishing ice-caps in the Arctic and Antarctica. 		reference to the LETI good practice guidance is also included.
Thames Water Utilities Ltd (Property)	2	SD	<p>Thames Tideway</p> <p>Bazalgette Tunnel Limited (trading as Tideway) is the company delivering the construction of the £4.3bn Thames Tideway Tunnel (‘TTT’). The Tunnel is being implemented under a Development Consent Order enacted on 3rd September 2014 and which came into force on 24th September 2014. Construction of the project is anticipated to be completed in 2025.</p> <p>London’s sewer system carries both foul sewage and surface water, largely making use of the hidden culverted rivers. The original Bazalgette sewage system, built more than 150 years ago, intercepted the old rivers at various points across London – notably along London’s embankments (newly built to accommodate them) and diverted combined sewage outflows to the main sewage treatment works downstream to the east of London. The development of the city has inevitably increased the quantity of sewage in the system beyond anything that might have been envisaged 150 years ago. The Thames Tideway Tunnel is a 25km ‘super sewer’ under the Thames, with a 7.2m internal diameter, to intercept spills and to hold storm discharges in the tunnel until it can be emptied and treated by Beckton Sewage Treatment Works. This will improve the quality of the River Thames and its environment.</p>	Noted. The draft Local Plan includes a policy on wastewater and water supply which supports the delivery of the Thames Tideway Tunnel.	No change.

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

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

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

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

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

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

		SD 11 SD 12			
Quaggy Waterway Action Group	2	SD 02	<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>	Support noted.	No change.
Quaggy Waterway Action Group	2	SD 02	<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>	<p>Noted. The Local Plan will carry full material in planning decisions, subject to it being found sound at examination and formally adopted by the Council. Whilst the Local Plan covers a long-term horizon, policies can be implemented on adoption.</p>	No change.
The Hatcham Society	2	SD 02	<p>Climate Emergency</p> <p>We appreciate Lewisham's acknowledgement of the ongoing and worsening climate emergency in the Plan. However, we do not believe the plan goes far enough to prove that the council is doing all it can to help mitigate the climate emergency.</p> <p>In the Sustainable Design and Infrastructure document, it says that the council considered "Requiring developments to meet carbon targets on-site in every case (e.g. not allowing flexibility for offset payments)" but instead settled for allowing flexibility for offset payments. If Lewisham was truly serious about the climate emergency, there would not be any flexibility and new developments must be forced to meet carbon targets on site.</p> <p>The Plan should encourage developers to adopt the Passivhaus method of building where homes are well insulated and relatively airtight so they do not require much heating or cooling (see the Stirling Prize nominated Goldsmith Street development for Norwich City Council). If the Passivhaus method was the borough's voluntary standard, the council would show it is taking their declaration of the Climate Emergency seriously.</p>	<p>Noted. The London Plan supports the inclusion of carbon-offset payment policies in boroughs' Local Plans. The Local Plan is clear that carbon offset payments will only be accepted in exceptional circumstances, where the applicant clearly demonstrates that carbon reduction targets cannot be fully met on-site.</p> <p>The Local Plan sets out sustainable design and construction policies which are considered to be in conformity with the London Plan. Whilst the Council would broadly support proposals that meet the Passivhaus standard, it is considered that requiring this standard for all new developments would not be financially viable, and therefore present soundness issues with respect to the NPPF.</p> <p>The BREEAM is widely accepted as good practice and the Council is therefore proposing to include this as a benchmark standard for certain types of developments.</p>	<p>Local Plan amended with policy supporting text stating that offset payments should only be used as a last resort.</p>

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

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

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

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

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

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

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

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

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

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

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

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

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

			<p>Borough where development may be at risk of other sources of flooding. The assessment must provide sufficient evidence for the Council to assess whether the requirements of the Sequential and Exception.”</p> <p>QWAG comments:</p> <p>Seeking to reduce flood risk while ensure resilience are in contradiction. The Council has the tools to know how developments will affect flood risk and so have the means to ensure that any development activity contributes to lowering flood risk as well as increasing resilience.</p>		
Greater London Authority	2	SD 08	<p>Sustainable Drainage</p> <p>The Mayor welcomes the reference to the drainage hierarchy (London Plan Policy SI 13 B), but the reference to the Sustainable Design and Construction SPG is outdated - in particular the reference to the 50% run-off rate reduction should be removed, given that the above-mentioned London Plan Policy supersedes this and clearly focuses on aiming to achieve greenfield run-off rates.</p>	Noted.	Local Plan amended as suggested, to refer to aim for greenfield run-off rate, as suggested.
Quaggy Waterway Action Group	2	SD 08	<p>A “Development proposals should aim to achieve greenfield runoff rates and ensure that surface water runoff is managed as close to its source as possible. Sustainable Drainage Systems (SuDS) should be incorporated into new development wherever possible, with priority given to green and blue over grey features, in line with the London Plan drainage hierarchy, as follows:</p> <ol style="list-style-type: none"> Rainwater use as a resource. Rainwater infiltration to ground at or close to source. Rainwater attenuation in green infrastructure features for gradual release. Rainwater discharge direct to a watercourse, unless not appropriate. Controlled rainwater discharge to a surface water sewer or drain. Controlled rainwater discharge to a combined sewer.” <p>B “All SuDS will be required to meet the Department for Environment, Food and Rural Affairs” Non-Statutory Technical Standards. They should also be designed to reflect guidance and principles set out in the London Plan Sustainable Design and Construction SPD and the SuDS Manual. In addition, all SuDS should:</p> <ol style="list-style-type: none"> Be located and designed having regard to the London Sustainable Drainage Action Plan along with the Council’s Surface Water Management Plan and Local Flood Risk Management Strategy; Be sensitively integrated into the development; Maximise opportunities to enhance biodiversity and local amenity; Improve the quality of water discharges, with provision for clean and safe water at the surface; and Function effectively over the lifetime of the development. 	Noted. The policy seeks to ensure that permeable surfaces are integrated wherever possible. However, there are Permitted Development rights which allow the paving over of front gardens and driveways, over which the Council exercises no control.	Local Plan amended to include reference to Ravensbourne Catchment Improvement Plan.

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

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

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

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

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

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

		<p>2021 the updated Ministerial Directions were issued by the Secretary of State which include for the continued safeguarding Convoys Wharf, with a reduced boundary reflecting the extant planning permission for the overall site and the associated S106 agreement for the site (Ref: DC/13/83358). This reiterates that this wharf remains viable for waterborne freight cargo handling and the PLA would emphasise the requirement for the site owners and partners, including the PLA to expeditiously progress with reactivation of the wharf in line with the permission. This must be reflected in this policy.</p> <p>As part of this part I of policy SD9 must be updated to the following:</p> <p><i>“Convoys Wharf is included within London’s network of safeguarded wharves. The Council will continue to safeguard Convoys Wharf taking into account the ministerial safeguarding direction of the wharf and extant planning consents and any future safeguarding Direction. Development proposals involving water transport at Convoys Wharf will be considered supported having regard to draft London Plan Policy SI15 (Water transport), along with other relevant policies”</i></p> <p>Supporting paragraph 11.64 must be updated to reflect the current position with regard to the Ministerial Safeguarding Direction of the wharf. Specific reference must also be given in this policy on the need for adjacent and nearby development proposals to be designed to minimise the potential for conflicts of use and disturbance, in line with the Agent of Change principle and London policy SI15, which specifically refers to the importance of this, including for vacant wharves, to ensure that the long term use and viability of the safeguarded wharf, which could operate over 24 hours a day in line with the tides is not constrained. In addition, reference on the need to ensure adjacent development is designed to minimise the conflicts of use and disturbance, in line with the agent of change principle must also be specifically highlighted in the site allocations sections for Convoys Wharf, and the adjacent Timber yard at Oxestalls Road site located to the south west of the safeguarded wharf boundary.</p> <p>With regard to supporting paragraph 11.65 on the councils support for the Lenox project ‘consistent with extant planning consent at this strategic development site’. As has been noted through the GLA's Safeguarded Wharves Review 2018-2019 consultation, the primary use of a safeguarded wharf is for the handling of waterborne freight, and an historic ship building site is not considered a water-borne freight handling use. Therefore in line with the extant planning consent and London Plan policy SI15 any proposed alternative development at the safeguarded wharf must first robustly justify why the site no</p>	<p>The Local Plan will be amended to appropriately reflect provisions on the Ministerial Safeguarding Direction for Convoys Wharf.</p>	<p>provisions on the Ministerial Safeguarding Direction for Convoys Wharf, along with additional recommendations for changes to the policy supporting text.</p> <p>Local Plan amended as suggested: to include reference to Estuary Edges guidance document; to include reference to recreational uses as appropriate uses on waterways; to refer to encourage developers to engage with relevant bodies on applications adjacent to waterways.</p>
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			<p>within a waterway but consider this should be amended to also refer to development located adjacent to waterways as well.</p> <p>Support the inclusion of figure 11.4, which shows the current safeguarded wharf boundary for Convoys Wharf, and the proposed amendment to the policies map, reflecting the current ministerial safeguarding direction boundary for the wharf.</p> <p>Support the reference in supporting paragraph 11.60 with regard to the Thames Tideway Tunnel project and that the council will continue to work with stakeholders to secure the delivery of this strategic infrastructure.</p>		
Port of London Authority	2	SD 09	<p>On other matters with regard to policy SD9, it is considered that the policy must be expanded to include a specific reference to the vital need to provide appropriate riparian life saving equipment (such as grab chains, access ladders and life buoys) alongside riverside areas to a standard recommended in the PLA's 'a safer riverside' guidance (2020) for developments on and alongside the Tidal River Thames, which supports the 1991 Hayes Report on the Inquiry into River Safety. The PLA also considers that there is need for suicide prevention measures in appropriate locations (such as CCTV and signage with information to access support) to be provided as part of new development along the riverside. This is supported by the recently published Drowning Prevention Strategy (2019) produced by the Tidal Thames Water Safety Forum (including the PLA, RNLI and emergency services) and this should also be referenced within this policy. Both of these documents can be found at https://www.pla.co.uk/Safety/Water-Safety/Water-Safety.</p>	Noted.	Local Plan amended in line with suggestions.
Quaggy Waterway Action Group	2	SD 09	<p>SD9 Water management Watercourses and flood defences, page 417</p> <p>A "Development proposals on sites containing or adjacent to a main river or ordinary watercourse will be required to:</p> <p>a. Demonstrate how the objectives of the Thames River Basin Management Plan, London River Restoration Action Plan, Marine Plan for the South East and other relevant local guidance, including the River Corridors Improvement Plan SPD, have been taken into account;</p> <p>b. Ensure that there is no adverse impact on the natural functioning of the watercourse, including by maintaining an undeveloped buffer zone with an adequate set back distance from the watercourse, as agreed with the Council and the Environment Agency;</p> <p>c. Investigate and maximise opportunities to enhance or restore river channels, flood flow pathways, floodplains and other natural flood management features with the objective of returning them to their natural state wherever possible;</p> <p>d. Where appropriate, provide a condition survey of existing flood defence and other watercourse infrastructure and if</p>	Noted.	Local Plan amended to include reference to Ravensbourne Catchment Improvement Plan.

			<p>necessary, provide for maintenance, repairs or remediation to secure the functional integrity of this infrastructure over the lifetime of the development; and</p> <p>e. Incorporate measures to enhance the ecological, amenity, recreational and historic value of water spaces, including by enhancing public access to these spaces.</p> <p>QWAG comments</p> <p>This section should give due weight to the Ravensbourne Catchment Improvement Plan and its list of projects.</p> <p>The Council says it wants to work with the community but the Plan fails to recognise the considerable local knowledge and expertise that exists outside of the Council and the Environment Agency.</p>		
Quaggy Waterway Action Group	2	SD 09	<p>Water quality</p> <p>B “All development proposals should seek to improve water quality and must ensure that there is no deterioration in the quality of a watercourse or groundwater, in line with the European Water Framework Directive 2000.”</p> <p>C “Where development is proposed within a Source Protection Zone it must not result in an unacceptable risk to groundwater quality.”</p> <p>Strategic role of waterways, page 418</p> <p>G “Waterways provide multifunctional social, economic and environmental benefits that support sustainable communities. Development proposals should identify and respond positively to the unique attributes of waterways, giving particular consideration to their:</p> <ul style="list-style-type: none"> a. Environmental function and ecological qualities; b. Contribution to the Borough’s network of open spaces; c. Recreational and amenity value; d. Distinctive features that help to shape and reinforce the Borough’s physical, cultural and historical character; e. Support for the visitor economy; and f. Potential to facilitate water transport” <p>Paragraph 11.52, page 419:</p> <p>“The Council has recently worked with the Environment Agency and other partners to deliver investment in river corridor improvements as part of its ongoing regeneration programme. This includes works along the Rivers Ravensbourne and Quaggy to provide improved defences and dedicated landscaped areas for flood storage, local amenity and improved biodiversity. These schemes have demonstrated that it is possible to put rivers back at the heart of new development and we aim to continue building on these successes.”</p> <p>QWAG comments:</p> <p>As stated elsewhere, this section should also give due weight to the Ravensbourne Catchment Improvement Plan and its list of projects.</p>	Noted. The draft Local Plan is considered to provide a strategic approach to water management which is consistent with national planning policy and in general conformity with the London Plan.	Local Plan amended to include reference to Ravensbourne Catchment Improvement Plan.

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

			<p>areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”</p> <p>Paragraph 26 of the revised NPPF goes on to state: <i>“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”</i></p> <p>The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that <i>“Adequate water and wastewater infrastructure is needed to support sustainable development”</i> (Paragraph: 001, Reference ID: 34-001-20140306).</p> <p>Policy SI5 of the new London Plan relates to water and wastewater infrastructure and supports the provision of such infrastructure to service development.</p> <p>It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.</p> <p>The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.</p> <p>As from 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The changes mean that more of Thames Water’s charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers</p>		
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			<p>(requisitions), traffic management costs, income offsetting and infrastructure charges.</p> <p>Information on how off site network reinforcement is funded can be found here https://developers.thameswater.co.uk/New-connection-charging</p> <p>Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:</p> <ul style="list-style-type: none"> - The developments demand for water supply and network infrastructure both on and off site; - The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and - The surface water drainage requirements and flood risk of the development both on and off site and can it be met. <p>Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water's free pre planning service are available at: https://www.thameswater.co.uk/preplanning</p> <p>In light of the above we support Policy SD9 and supporting paragraphs in this respect.</p>		
Thames Water Utilities Ltd	2	SD 09	<p>Local Authorities should also consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Thames Water are currently in AMP7 which covers the period from 1st April 2020 to 31st March 2025. AMP8 will cover the period from 1st April 2025 to 31st March 2030. The Price Review, whereby the water companies' AMP8 Business Plan will be agreed with Ofwat during 2024.</p> <p>We therefore request that the new Local Plan include the following policy/supporting text:</p> <p><i>"The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised."</i></p>	Noted.	<p>Local Plan amended to include new standalone policy on water supply and wastewater, in order to make clearer the requirements around this type of infrastructure. The policy supporting text refers to the short term period of AMPs and acknowledges the need to plan positively for this type of</p>

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

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

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

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

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

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

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

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

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

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

			<p>a key role in any Plan that seeks to achieve a carbon neutral Borough.</p> <p>We would propose that in the Plan the Council should “retrofit” the current built environment in the following way:</p> <p>the Council should commit to improving its recycling rates so that they are amongst the top five boroughs in London within 5 years and seek to learn from other London boroughs and comparable cities elsewhere in the UK whose performance outstrips Lewisham’s;</p> <p>in particular, the Council is strongly urged to set in place policies and procedures that will deliver robust recycling facilities for all residential flats; and that food waste recycling also be made available to all residential properties.</p>		
Lewisham Pedestrians	2	SD 12	<p>Principles for determining planning applications – the Local Plan</p> <ul style="list-style-type: none"> The amount of space in both small and large developments given over to service functions should be demonstrably minimised. Attention is drawn to the Create Streets document <i>"The bin-lorry effect"</i> where this principle is detailed. This will encourage walking by making navigation for pedestrians both easier and safer. Residential and commercial waste should not be stored on the footway at any time. This includes during collection times as well as storage. Planning applications should show how this will be achieved. This will encourage walking by making navigation for pedestrians safer. 	<p>Noted. The draft Local Plan includes new standards and policies to help ensure that waste management and recycling facilities are provided in new developments, and that these are appropriately considered through the design-led approach. The policies seek to ensure that adverse impacts on the public realm are avoided and appropriately mitigated.</p> <p>The Council is currently preparing a Waste Strategy 2021-2031 which will set out priorities and actions for reducing waste, along with re-use and recycling of materials.</p>	No change.
Port of London Authority	2	SD 12	<p>8. Policy SD12: Design to Support the Circular Economy.</p> <p>In principle support the policy, including part C which states that development proposals will be expected to sustainably manage both the type and volume of recyclable materials and waste arising from the development during the construction and operational phases. To further support this, as road freight is a major contributor of CO2 emissions, waterways must be considered as part of the solution to reduce dependency on the road network for the transportation of construction materials and freight and should be referenced as part of this policy, specifically for the transportation of construction materials to, and waste from a development site either directly to/from the site or through the supply chain. This would strongly align with the opportunities and challenges of the Local Plan to reduce carbon emissions and improve air quality and is supported by the Thames Vision, which includes the goal to see more goods and materials routinely moved on the river</p>	Support noted.	Local Plan waterways policies amended to provide additional support for freight movement on waterways.
South East London Labour	2	SD 12	<p>We support the sustainable design proposals and the circular economy model. However we hope that the plan can include more radical alternatives e.g. French architects Lacaton &</p>	Noted.	No change.

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

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

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

	2	TR	<p>Traffic and Transport:</p> <p>The draft plan seems to recognise that public transport capacity in the borough is now overstretched with overcrowded trains and platforms and a poor service on several lines. Much of the restriction on rail capacity is, I think, caused by the capacity and signalling issues near Lewisham station where various rail lines cross. There needs to be a joined up initiative of the GLA, TfL, and the south London boroughs to identify what improvements could be made to increase capacity and frequency on all the lines. For example, I believe Bexley has a huge potential for additional residential development but needs more and better train services which are constrained by the Lewisham junction. We are aware that dealing with Network Rail, the train operators and the railway jobsworths is a thankless task but there needs to be some serious work and a joined up approach to getting funding and sorting it out.</p> <p>The draft plan and the growth in residential units which it proposes seem to be predicated on the additional capacity afforded by the Bakerloo line extension to New Cross and Lewisham. The damaging effects of Covid on TfL finances make this proposal highly unlikely and even if it does go ahead it is not going to be in the life of this plan. Just see how long Crossrail has taken or the Jubilee line. However, the plan makes no attempt to analyse how all these additional residential units can be serviced and accommodated without a drastic level of improvement in rail and bus transport. The plan shouldn't even mention the extension to Catford as that's definitely not going to happen within the lifetime of the plan and the extra housing outlined in the plan for Catford needs to assess the additional traffic and transport it would generate and require and how it will be serviced. Otherwise the plan is not assessing how these extra units will impact on the existing residents and bus and train users.</p> <p>The plan also makes no mention of the bottleneck caused by the railway bridge at Catford or the restricted pavements on the bridge over the Hayes line. The south circular at this point is pretty much a permanent car park and traffic jam which adds to an awful environment and terrible air quality. Unless active steps are taken to replace the bridge and widen the road under it and provide better wider pavements under it and over the Hayes line bridge and totally review all the junctions, I fail to see how the Wickes sites can be redeveloped for high density housing. Traffic out of the site from the exit nearest the bridge regularly ignores the left turn only requirements and blocks traffic by turning right. The plan should be making clear proposals as to what solutions are available. Likewise, we fail to understand how any proposals are going to come forward during the life of the Plan to realign the South Circular. TfL have</p>	<p>The Council is working with infrastructure delivery partners TFL and Network Rail to improve the boroughs public transport provision including upgrades to the Overground, a new station at Surrey Canal triangle, DLR capacity upgrades and bus service improvements. We are also working together on a new station for Lewisham Town Centre which will fundamentally improve capacity and passenger experience.</p> <p>The Council is a strong advocate of the BLE and the benefits that this will bring to Lewisham residents. However the planned growth within the Local Plan is not predicated on the delivery of the BLE. The housing figures and resulting population growth set out in the London Plan for the borough has been tested by TFL through the London Plan process and through Lewisham's Transport assessment which accompanies the Local Plan. These both demonstrate that there is sufficient capacity across existing and committed improvements to the transport network to accommodate this growth.</p> <p>The Catford Framework sets out the Councils aspirations for Catford Town Centre and outlines a number of transformational transport projects. We are currently working with our partners TFL and Network Rail to deliver these improvements.</p>	No change.
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			failed for the last umpteen years although I am aware they have not allowed the Council to remove the proposals from the plan. Perhaps the council should indicate a plan B and give a time limit on the period for the life of the realignment.		
Blackheath Society no 2	2	TR	We broadly agree with the Main issues. We would add (perhaps to Environmental impacts) the impacts on health and well-being of pollution and noise from vehicle use which also deters walking and cycling and damages the public realm.	Noted. The Local Plan broadly addresses environmental and amenity impacts, and the transport policies are a key means to address poor air quality locally.	No change.
Blackheath Society no 2	2	TR	We broadly agree with the headline proposals. We would place greater emphasis on the Lewisham station/interchange upgrade (<10 mentions in the Plan, despite upgrade looking quite likely and relatively early in the Plan [2027]) and on other upgrades to the existing rail and river networks; and less emphasis and dependence on the BLE (750+ references despite it looking less likely at present, certainly not until late in the Plan [post 2030], and then probably only as far as Lewisham).	Noted. Both the Lewisham interchange and BLE are included in the list of key priority transport projects. Whilst the level of growth within the plan is not predicated on the delivery of the Bakerloo Line Extension the Council continues to be confident that the business case for the BLE is robust and we will continue to promote the project to secure the necessary funding.	No change.
Blackheath Society no 2	2	TR	We would add to proposals to Make neighbourhoods healthier and more liveable the idea of the '15 minute city' to improve health, encourage localism in transport and the economy, and reduce the need for motorised transport, especially by road.	Noted. This is reflected in the spatial strategy although it is agreed a reference to 15 minute neighbourhood could be added.	Policy OL1 spatial strategy supporting text amended to refer 15-minute neighbourhood concept.
Brockley Society	2	TR	<p>3.Effective, concrete measures for reducing car use in the borough are needed urgently</p> <p>Chapter 12 of Part Two (Transport and Connectivity) states the aim of reducing car use. Chapters 8 (Economy and Culture) and 11 (Sustainable Design & Infrastructure) support this by noting the benefits of "walkability", the urgency of climate change and the air quality problem in parts of the borough. Despite this, the draft includes no credible measures for reducing car use.</p> <p>Many of the measures proposed, such as improvements to stations and bus stop infrastructure, are already in place in the areas worst affected by car congestion – it is notable that the areas shown in Figure 12.1 as having the best PTALs also have the worst traffic congestion, parking congestion and air quality in the borough and are the least walkable. The Council must consider more effective measures to reduce the environmental and health impact of car use in Lewisham, such as:</p> <ul style="list-style-type: none"> • Creating low-traffic neighbourhoods that are protected from motorised through-traffic (as proposed by London Living Streets in response to the Council's consultation in November 2018). • A comprehensive borough-wide approach to residents'-only parking zones (subject to appropriately limited hours of operation, visitors' permits, etc.). This is important in order to 	<p>The Local Plan sets out this holistic approach and is supported by the Transport Strategy and Local Implementation Plan (LIP). This document outlines how the Council will work with TFL and other key stakeholders to assist with delivering the outcomes, policies and proposals within the London Plan, the Mayors Transport Strategy and the Local Plan. The document also sets out detail of local priorities and targets.</p> <p>Low Traffic Neighbourhoods are outside the scope of the Local Plan. The Council has piloted LTNs and the Council's Transport service should be contacted for further details.</p> <p>The Council has recently committed to rolling out CPZs across the borough where they are supported.</p> <p>Implementing 20mph speed limits has been proven to improve road safety and reduce serious injuries from road traffic accidents. Whilst there is less evidence on the impact of 20mph speed limits on air quality the studies that have been conducted or include this analysis show impacts as negligible or slight improvements. Research into the impact of 20mph speed limits on active travel show higher levels of walking in cycling in areas after the implementation of 20mph speed limits.</p>	Local Plan parking policies amended to fully align with London Plan parking standards.

			<p>avoid traffic and parking problems simply being redirected from one part of the borough to another – as has been seen in Brockley following the introduction of the Ladywell CPZ. Lewisham can learn from the positive experiences of other inner-London boroughs such as Hackney.</p> <ul style="list-style-type: none"> • Pedestrianised entertainment / retail areas. For example, the immediate vicinity of Brockley station has been temporarily pedestrianised to allow local cafes and restaurants to offer socially distanced outdoor seating. This has been very successful and should be made permanent. <p>Simply reducing vehicle speeds further (as suggested at paragraph 3.34 of page 72) would merely increase the number of vehicles on a given road at any given moment, which would only worsen congestion issues and the borough's air quality. Increasing provision of electric charging points (per policy TR4 on page 456) would similarly do nothing to reduce the number of cars on the road, which is crucial to reducing congestion and increasing walkability.</p>		
Climate Action Lewisham	2	TR	<p>Transport and connectivity</p> <p>We strongly support Lewisham's ambitious target of 90% of journeys being by active travel or public transport by 2041, which exceeds the London-wide target of 80%. This is ambitious but the council must consider the whole borough and absolutely all development decisions if they are to have the possibility of achieving this target, and to prioritise how they support residents to use active travel and public transport in place of private vehicles. We applaud plans to ensure that blue badge access is protected and prioritised in all decisions, and the emphasis given to cycling facilities. The requirement on developers to submit healthy streets assessments (Policy TR3 B p.451) is excellent, and we would like to see the details of what stringent standards developments are required to reach and have a clear indication of the consequences of failure to meet them. Council clarity of priority and leadership in creating the kind of urban spaces that encourage and enable sustainable transport options is crucial.</p>	<p>Noted. The Local Plan uses the London Plan target of 90% journeys by walking, cycling and public transport for inner London boroughs as the policy basis – the 80% target is London-wide. Please refer to Policy TR1 Sustainable transport and movement and explanatory text paragraph 12.1. This is an ambitious target and will require substantial investment and support at regional level as well as at a local level.</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 detail of local priorities and targets.</p>	No change.
Culverley Green Residents Association	2	TR	<p>Traffic and Transport</p> <p>The draft plan seems to recognise that public transport capacity in the borough is now overstretched with overcrowded trains and platforms and a poor service on several lines. Much of the restriction on rail capacity is, I think, caused by the capacity and signalling issues near Lewisham station where various rail lines cross. There needs to be a joined up initiative of the GLA, TfL, and the south London boroughs to identify what improvements could be made to increase capacity and frequency on all the lines. For example, I believe Bexley has a huge potential for additional residential development but needs more and better train services which are constrained by the Lewisham junction. We are aware that</p>	<p>Noted. The Council is currently working with key stakeholders such as TFL, Network Rail and neighbouring authorities to identify public transport capacity and service improvements. This includes upgrades to the Overground, a new station at Surrey Canal triangle, DLR capacity upgrades and bus service improvements. We are also working together on a new station for Lewisham Town Centre which will fundamentally improve capacity and passenger experience.</p>	No change.

			dealing with Network Rail, the train operators and the railway jobsworths is a thankless task but there needs to be some serious work and a joined up approach to getting funding and sorting it out.		
Deptford Society	2	TR	<ul style="list-style-type: none"> - There is very little cross-reference to Lewisham's separate Transport Strategy and Local Implementation Plan. - There are no mode share targets for new developments as a whole to show how this delivers a proportion of the overall traffic reduction strategy / decarbonisation agenda etc. 	Noted. Whilst there are no mode share targets for new development, the Local Plan and the London Plan has stringent policies on car parking, promoting car free development in accessible locations and 'car lite' development elsewhere. This is assessed through the Development Management processes and is supported by Travel Plans and Transport assessments. These measures along with others within the draft Local Plan are and will continue to reduce car borne traffic generated by new development.	Local Plan amended with reference to Lewisham's transport strategy and Local Implementation Plan in supporting text where appropriate.
Lee Forum	2	TR	A holistic approach is needed for transport to allow active travel, reduce car use, and create sustainable delivery options. Better cross borough transport links are needed to provide access to community facilities by public transport.	Agreed. The Local Plan sets out this holistic approach and is supported by the Transport Strategy and Local Implementation Plan (LIP). This document outlines how the Council will work with TFL and other key stakeholders to assist with delivering the outcomes, policies and proposals within the London Plan, the Mayors Transport Strategy and the Local Plan. The document also sets out detail of local priorities and targets. Please refer to strategic objectives as well as policies TR1 Sustainable transport and movement and TR3 Healthy streets as part of a healthy neighbourhoods.	No change.
Lee Forum	2	TR	<p>A key concern in meeting targets for reducing car journeys is the need for the council to actively promote sustainable local delivery options such as pick up points at hubs to avoid additional delivery journeys replacing private car journeys.</p> <p>To encourage sustainable delivery options through hire of delivery cycles or electric vehicles.</p>	Noted. This is captured in Policy TR5 Deliveries, servicing and construction including the explanatory text paragraph 12.29. The Transport Strategy also has further details.	No change.
Lee Forum	2	TR	Lee Forum has made representations to TFL for new bus routes from the Forum area particularly to connect with Greenwich Town Centre and Greenwich Peninsula following a popular local consultation on the subject . The Council, if it is to cut car journeys, must add its weight to improved south/north bus routes, so that journeys do not all have to be made via changes in Central Lewisham.	Agreed. The Council is working with TFL to secure improved bus provision across Lewisham. Details on local priorities and projects can be found in the Transport Strategy and Local Implementation Plan (LIP) which forms a key evidence base for the draft Local Plan.	No change.
Lewisham Cyclists	2	TR	We believe some of the wording in the plan should be revised to bring it in line with existing policies from City Hall, where walking and cycling should be "enabled" as opposed to "encouraged". Lewisham council has been encouraging and promoting cycling for more than a decade , yet still has one of the lowest mode shares for cycling amongst all inner London boroughs, and the worst Healthy Streets Score of any Inner London borough . The key missing element to date has been dedicated infrastructure, creating a fully integrated cycle network which meets London Cycle Design Standards and	Noted.	Local Plan amended to ensure wording of specific policies and aligns more closely with the London Plan e.g. enabling not just encouraging

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

			targets of doubling the number of cycling journeys; increasing the proportion of people cycling to work to 10%; halving casualty rates of cyclists; and increasing the proportion of children cycling to school to 50% remain, and the gap towards closing in on those laudable metrics is as challenging as ever. Out of the 21 “quick win” cycle contra-flows identified, only 3 have been implemented in the period since the review.		
Lewisham Cyclists	2	TR	More positively Lewisham has made progress with school streets but there are many more significant and structural interventions required before Lewisham becomes an active travel exemplar. Securing these will require a more joined-up strategic approach where the Borough can apply an organisation wide culture of thinking beyond the car, amongst all its officers and members.	Noted. Not specific to the Local Plan but we will pass on your comment to the Strategic Transport and Highways team.	No change.
Lewisham Cyclists	2	TR	Despite our obvious reservations on the scale of the challenge ahead, we remain committed to supporting Lewisham where there is commitment to real and lasting change. Anecdotally the number of people cycling, and crucially the number of people who would cycle if it was safe, have grown during the pandemic. Despite the hardships and tragedies of the past year, most of us have significantly changed our behaviour in our daily lives. We want a new normal which enables more people to walk and cycle in a safe and pleasant surrounding that is good for health, and people’s social and mental well being. It will also make them happier and benefit the local economy and cultural life of the Borough.	Noted.	No change.
Lewisham Cyclists	2	TR	<p>General points about infrastructure schemes:</p> <ul style="list-style-type: none"> • The Mayor’s Streetspace Plan and Transport Strategy relies on a growth in cycle trips to keep London moving. This means infrastructure schemes must be designed to accommodate growth in cycling. Providing space for cycling is a more efficient use of road space than providing space for driving private motor vehicles, particularly for journeys of 5km or less. In terms of providing maximum efficiency for space and energy use, walking, cycling, then public transport are key. • As demonstrated by the success of recent Cycle Superhighways and mini-Holland projects etc., people cycle when they feel safe. For cycling to become mainstream, a network of high-quality, direct routes separate from high volumes and/or speeds of motor vehicle traffic is required to/from all key destinations and residential areas in an area. Schemes should be planned, designed and implemented to maximise potential to increase journeys – with links to nearby amenities, residential centres, transport hubs considered from the outset. • Spending money on cycling infrastructure has been shown to dramatically boost health outcomes in an area. Spending on cycling schemes outranks all other transport modes for return on investment according to 	These general points are supported by the Council and have informed our policies within the Local Plan.	Local Plan amended to include an additional policy point referencing the London Cycle Design Standards.

			<p>a DfT study. Schemes which promote cycling meet TfL's "Healthy Streets" checklist. A healthy street is one where people choose to cycle.</p> <ul style="list-style-type: none"> • All schemes should be designed to enable people of all ages and abilities to cycle, including disabled people. • Evidence from TfL and from many schemes in London, the UK and worldwide shows the economic benefits, including to businesses, to be found from enabling a wider range of people to cycle more. Further evidence shows how cycling schemes also benefit air quality and reduce climate changing emissions, as well as improving resident health outcomes and reducing inactivity, as mentioned above. • LCC wants, as a condition of funding, all highway development designed to London Cycling Design Standards (LCDS), with a Cycling Level of Service (CLOS) rating of 70 or above, with all "critical issues" eliminated. Above 2,000 Passenger Car Unit (PCUs) motor vehicle movements per day, or 20mph motor traffic speeds, cycling should be physically separated from motor traffic. 		
Lewisham Liberal Democrats	2	TR	<p>6. Consideration should be given to new modes of transport in the borough in general, such as a tram system. There is practically no mention of facilities for electric cars (extra charging points) or the impact of extending the Bakerloo line to Lewisham. In the Lewisham south plan, the Bakerloo Line extension is an integral part of the anticipated development at Bell Green. Would the latter go ahead if the extension does not materialise, because without it there would not be adequate transport links for this proposed development?</p>	<p>Noted. The draft Local Plan identifies and seeks to secure the delivery of transport projects identified in the Local Implementation Plan and the Mayor's Transport strategy.</p> <p>The delivery of the Local Plan is not contingent on the delivery of the BLE. The Phase 2 of the BLE would help to enable a significant uplift housing in the Bell Green area with improved transport access providing for higher densities.</p>	No change.
Lewisham Pedestrians	2	<p>TR</p> <p>Infrastructure Delivery Plan</p>	<p>Transport infrastructure schemes</p> <p>The opportunity to make our streets and open spaces safer for everyone now exists through improved lighting, safety campaigns, emergency facilities, wider footways that are clear of clutter and well maintained etc. Walking networks should be the norm with supporting measures on main roads with safe crossings that follow desire lines.</p> <p>Examples of schemes that we would like funded through the CIL and included in the IDP:</p> <ul style="list-style-type: none"> • Safe crossing places on all the main roads (designated A or B) in the borough following desire lines and at intervals of no less than 100 metres. These roads include TfL's TLRN as well as a number of council roads. • A pedestrian phase on all arms of all signalised junctions in the borough. These should be straight across (never leaving people standing in the centre of a 	<p>Noted. These general principles are picked up through policy QD3 Public realm and connecting places, TR3 Healthy streets as part of healthy neighbourhoods and London Plan policy T2 Healthy streets.</p> <p>The Infrastructure Delivery Plan identifies specific infrastructure projects needed to sustainably support future population growth and housing delivery in Lewisham.</p> <p>If groups have specific community projects they wish to promote these can be submitted through the Neighbourhood CIL process.</p>	No change.

			<p>busy road), provide enough time to cross (based on 0.6 m/s) and with fair waiting time (based on actual user counts, modal encouragement, comfort and behavioural safety analysis).</p> <ul style="list-style-type: none"> • Provision of appropriate resting point seats for people who cannot walk far. • Far wider footways around bus stops and especially those that are busy at public transport interchange points and in commercial and leisure centres. • Schemes should enable the council to clear pavement clutter (using contractors or using/threatening Enforcement Notices). • Schemes should enable auditing of footway quality (surfaces and useable widths). • Schemes should speed up the repair of reported damaged/dangerous footways (using additional contractor capacity). • Schemes should support the improvement of the de-icing/gritting regime (see this TfL document for further information). • Removal of pavement parking in the borough so that vehicle parking is in the roadway. This can be done using a programme of new traffic orders and re-positioning of road markings. Pavement parking discourages walking because it is dangerous and restricts the footway. • End illegal pavement parking in the borough through public information and enforcement. Pavement parking discourages walking because it is dangerous and restricts the footway. • Development of a borough-wide walking network that links likely places of origin and destination for walking journeys. 		
Lewisham Pedestrians	2	TR	We support the extension of bus services over all other forms of public transport. Bus services can be more easily extended, have much better reach, are flexible, cheaper and have the potential to provide zero (or near zero) carbon emissions.	Noted.	No change.
Lewisham Pedestrians	2	TR	We support the ending of the use of minor roads (those not designated A or B) as cut-throughs by vehicles. This makes all roads safer with the additional benefit of reducing turns in, and out, from main roads and the further provision of continuous pavements where roads are closed off.	Noted.	No change.
Lewisham Pedestrians	2	TR	Additionally, we wish to draw attention to the Doggett Road footbridge that appears to currently have inadequate funding despite the allocation of a large amount of s.106 monies. We would like to see this scheme funded as soon as possible from unspent transport infrastructure allocation. A bridge with lifts would cost no more than £2m and the budget allocated is already in excess of £1.5m – Lewisham Pedestrians has met with architects working with Network Rail on footbridge design	Noted. At its meeting on 16 th September 2020 Mayor & Cabinet agreed the transfer of S106 funding originally proposed for the delivery of a footbridge between Doggett Road and the Barratt's development on the former Catford Greyhound Stadium site to be used to deliver a programme of public realm and accessibility improvements to Catford Station areas. See M&C report for further details.	No change.

			regarding this matter and are exploring how to progress this scheme.		
Lewisham Pedestrians	2	TR Infrastruct ure Delivery Plan	<p>Social and green infrastructure schemes – health and care facilities</p> <p>Walking provides effective and sustainable physical activity and wider healthy lifestyle opportunities for everyone who lives, works or learns in Lewisham. Walking is a ‘miracle cure’ in terms of a truly equitable and inclusive measure that helps to provide ill-health prevention along with longer, fitter lives. Current research is confirming the mental well-being and cognitive benefits of simply getting up and putting one foot in front of the other.</p> <p>We have identified that <i>everyday walking</i> is a physical and mental activity that fits nearly every aspect of the borough’s healthy lifestyles strategy aims. <i>Everyday</i> walking allows everyone in the borough to explore, relax, unwind, be challenged, achieve well-being, acquire fitness, control or reduce weight, meet other people, experience adventure and have fun. Walking is linked with all the travel, work, leisure and learning activities that take place every minute of every day in every part of the borough.</p> <p><i>Everyday walking</i> compares well with every alternative form of physical activity – no assisted travel is required to other locations, there are no parking issues, walking creates no pollution, it is affordable for everyone, every part of the borough is covered, no one is left out, local authority resources go a long way and walking facilities are open all day, every day.</p> <p>Examples of schemes that we would like funded through the CIL and included in the IDP:</p> <ul style="list-style-type: none"> • Park entrances safer, more easily identified and inviting for people walking by creating new zebra crossings at entrances and access points. This will encourage park use for walkers and make access safer. • All Lewisham residents and learners should be familiar with and have access to a pedometer, activity tracker or smartphone app. This will help encourage walking, improve health and reduce obesity. • Provision of dedicated walking exercise tracks in parks and open spaces for people walking to keep healthy. 	<p>Noted. These general principles are picked up throughout the Local Plan including policy TR3 Healthy streets as part of healthy neighbourhoods and London Plan policy T2 Healthy streets.</p> <p>The Infrastructure Delivery Plan identifies specific infrastructure projects needed to sustainably support future population growth and housing delivery in Lewisham.</p> <p>If groups have specific community projects they wish to promote these can be submitted through the Neighbourhood CIL process.</p>	No change.
Make Lee Green	2	TR	<p>Low Traffic Neighbourhoods Work</p> <p>As a group that was formed to support the introduction of an LTN, it should not be a surprise that <i>Make Lee Green</i> would like to see LTNs introduced more widely across Lewisham. The evidence from academic research and the Council’s own monitoring in Lee Green have shown that LTNs can dramatically improve the quality life for residents, reduce air pollution, lower crime and improve road safety. All of this</p>	Noted. Low Traffic Neighbourhoods are just one of many measures that Local authorities are exploring to make it safer to travel by foot or by bike and contribute to the achievement of the London Plan target for 80% of all Journeys in London to be made by walking, cycling or public transport by 2041.	No change.

			<p>without raising traffic or pollution levels on surrounding roads. The statistics from other inner London LTNs are compelling.</p> <p>Reallocating road space to walking and cycling reduced traffic by 21.9% on average and the surrounding areas saw no additional traffic</p> <ul style="list-style-type: none"> - Lambeth's LTN has seen traffic fall by 35% and cycling increase by 69% - The Dulwich LTN saw a 700% increase in children cycling to school - Railton Road had a 175% increase in women on bikes - Research has demonstrated that LTNs lead to a 10% reduction in street crime <p>The Lewisham and Lee Green LTN has transformed the area. We had streets that we experiencing 3 million cars per year. That is the equivalent of every car in London driving past some homes. While we still see spikes in traffic as a result of the partial reversal of the LTN, overall traffic remain substantially lower and according to the Councils own data there has been no impact on air quality on surrounding roads^{viii}. Instead we have seen huge increases in children walking and cycling to school. The streets are safer and more walkable. Local shops are seeing the benefits of increased trade.</p> <p>What has happened in Lee Green could be replicated across Lewisham. There is a clear need to reduce traffic on the minor and residential streets where 90% of Londoners live. According to Department for Transport analysis these streets have seen a 72% increase in traffic over the last decade, while A-roads have seen traffic decline slightly^{ix}.</p> <p>This is unsustainable and unfair. Driving is a minority activity in Lewisham. 55% of households do not have access to a car^x yet we all suffer the consequences of uncontrolled car usage.</p> <p>Every properly conducted poll has found that there is overwhelming support for LTNs. Redfield & Wilton's latest results are that 47 per cent of Londoners either support or strongly support them compared with just 16 per cent who oppose or strongly oppose them^{xi}.</p> <p>Fundamentally, Lewisham needs streets for people not roads for cars. Streets where people live and work and shop and play. That's the overarching goal of Low Traffic Neighbourhoods - to turn roads that are used as a shortcut to somewhere else back into streets that serve the communities that live along them. Tackling unsustainable traffic is key to solving so many other objectives of the Plan and we believe action on LTNs is an essential component in delivering a greener, healthier and more equitable Lewisham.</p>	<p>Low Traffic Neighbourhoods are outside the scope of the Local Plan. The Council has piloted LTNs and the Council's Transport service should be contacted for further details.</p> <p>We will pass your comments on to our Transport and Highways team who are currently working on the LTNs.</p>	
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Make Lee Green	2	TR	<p>Action on Main Roads</p> <p>The Plan recognises that the “strategic corridors”, the A20, A21 and South Circular are major barriers to progress and are the cause of significant health, social and environmental problems in the Borough. We support the stated aim of transforming them in to “well functioning and healthy streets”. But no solutions are proposed in the Plan.</p> <p>These roads should not be A-roads. They are not fit for purpose. The plan needs to recognise them for what they are – in large part residential roads with excessive traffic on them. Diverting this traffic on to B and unclassified streets is not a solution. A radical re-think is required. Either they need to be reclassified and traffic managed down to normal levels, or they need to radically upgraded to cope with the volumes of cars on them. All three of these roads are planning errors from the 1960s that need to be corrected, and a failure to acknowledge this will seriously hamper the ability of the Council to deliver on the objectives of the Plan.</p>	<p>Noted. As you have noted the Local Plan acknowledges these as strategic corridors and the challenges that these streets bring.</p> <p>These ‘red routes’ are in the ownership and control of TFL and are key arterial routes in TFL’s road network.</p> <p>The Council will continue to work with TFL to improve these corridors and transform them into well-functioning and healthy streets.</p>	No change.
Make Lee Green	2	TR TR 03	<p>Action on Cycling</p> <p>Lewisham’s record on safe cycling is particularly poor and this needs to change urgently.</p> <ul style="list-style-type: none"> - Segregated cycle lanes should be installed on all main roads under both TfL and Council control. All new developments along corridors such as the A21, A20, A205 and A2212 should have strategic planning conditions required by S106 or CIL contributions from developers to provide funding for necessary infrastructure to meet Council Transport and Cycle Strategies. - Cycling infrastructure should be fully integrated with the public transport network. There should be safe cycling routes to and from all train and tube stations. This should be designed in line with TfL Cycling Action Plan requirements, meeting or exceeding London Cycle Design Standards. - Adequate, secure bike racks should be installed at every station, high street, residential development and school exceeding current London Plan requirements. - The Plan should incorporate the recommendation of the London Cycling Campaign’s <i>Climate Safe Streets</i> reportxii. 	<p>Noted. The Council will continue to work with TFL to improve these corridors and transform them into well-functioning and healthy streets. The feasibility and financial viability of segregated cycle lanes will continue be explored.</p> <p>The draft Local Plan Transport policies broadly support the delivery of high quality public realm as part of the integrated approach to transport, and rebalancing the transport system away from car use to more sustainable modes.</p>	<p>Local Plan amended to refer London Cycle Design Standards.</p> <p>Local Plan amended to make clearer the priority afforded to movement by walking, cycling and public transport, including revised parking policies to reflect the London Plan parking standards.</p>
NHS (HUDU)	2	TR	<p>Sustainable Transport and Connectivity</p> <p>We broadly welcome this section. However, we would highlight the importance of ensuring that the design of new developments ensures adequate access for emergency vehicles, and the transport network allows good access for emergency vehicles to get to their destination within the necessary timescales.</p>	Noted	TR5 amended to include reference to emergency vehicles as suggested.

NHS (HUDU)	2	TR	Reference is made to the A21 and TfL Healthy Streets, however, this should apply more widely including across Lewisham Town Centre, as it and other areas lack green infrastructure with few trees and large areas of hard landscaping. The positive impact of greening urban area on health, particularly mental health is well documented.	Noted. Draft Local Plan Policy TR3 Healthy streets as part of healthy neighbourhoods covers all streets within the borough including those within Lewisham Town Centre. Local Plan Part 3 on Lewisham's North Area sets out further detailed requirements for Lewisham town centre, including site allocations within it.	No change.
Telegraph Hill Society	2	TR	We believe that the Plan considerably misestimates the changes which will occur during the period of the Plan. Clearly demand will increase, if the increase in population for the Borough actually materialises; on the other hand, changes in demographics as regard home working and the attractiveness of the City centre may reduce radial transport, whilst increasing home delivery demand may affect cross-London and local journeys.	In accordance with the NPPF the Local Plan will be reviewed and updated every 5 years. Any significant changes that have not been anticipated through the plan preparation process and the transport assessment will be picked up then.	No change.
Telegraph Hill Society	2	TR	The key issue with connectivity within the Borough is that all public transport modes (and many of the main roads) are radial, severely limiting cross South London journeys. This is particularly apparent with the rail links. A journey, for example, from New Cross Gate to Dulwich might take 20 minutes by car but can take an hour by train or bus with the changes and walking involved and not all residents have the ability or desire to cycle.	The Local Plan has been prepared in collaboration with our transport team and informed by evidence base documents such as the Transport Assessment, Train strategy etc. The Council acknowledges the current issues with east west public transport connectivity and is working with transport providers to make improvements.	No change.
Telegraph Hill Society	2	TR	We are not sure that the Plan adequately caters for a change to electric vehicles. We would see the demand for these, over the life of the Plan, and particularly with target of phasing out diesel and petrol vehicles by 2030, increasing substantially. Given the poor public transport connectivity on non-radial routes, we do not necessarily see car usage falling drastically, despite the current Mayor of London's ambitions.	The Local plan responds to the London Plan target of significant modal shift.	No change
Telegraph Hill Society	2	TR	We note TR4.1 but consider that more thought needs to be given in the Plan for the need for electric charging points and garaged accommodation in new developments, especially given that such developments will have a life longer than that of this Plan. The Plan also needs to set out how local recharging points will be created in existing areas to facilitate the changeover of current residents from petrol/diesel to electric, particularly given that the overwhelming majority of properties in the north of the Borough do not have garage accommodation.	The Local Plan supports the parking standards set out in the London Plan which promotes car free or car lite development. Whilst we acknowledge the need for car charging points we recognise the need to dramatically reduce the number of trips by private vehicles.	No change
Telegraph Hill Society	2	TR	The Plan at § 12.26 states that <i>"it is recognised that that some residents and commercial uses in less well-connected areas will continue to rely on vehicles"</i> . As we have indicated in examples above, "well-connected" is a widely misused term. New Cross Gate, for example, is well-connected with certain areas but not well-connected to many destinations either west or east. Nor is it currently well-connected with a range of shops other than for food provision (see our comments on policy EC12 at paragraphs 169 to 173). Furthermore, lack of connectivity itself is only one reason why vehicle use remains popular: cars are convenient. Public transport lacks door-to-door convenience and immediate availability. There is also the need to carry	Whilst we accept that PTAL is a blunt tool it is recognised as an indication of how well a place is served by public transport. New Cross Gate is a well-connected neighbourhood and as such new development should be car-free. In order to improve air quality, reduce traffic congestion and meet the London Plan targets for modal shift we must reduce the reliance on private vehicles.	No change.

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

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

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

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

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

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

			<p>and the air quality problem in parts of the Borough. Despite this, the draft includes no credible measures for reducing car use and improving walking and cycling infrastructure.</p> <p>Many of the measures proposed, such as improvements to stations and bus stop infrastructure, are already in place in the areas worst affected by car congestion – it is notable that the areas shown in Figure 12.1 as having the best PTALs also have the worst traffic congestion, parking congestion and air quality in the borough and are the least walkable. The Council must consider more effective measures to reduce the environmental and health impact of car use in Lewisham, such as:</p> <ul style="list-style-type: none"> ❑ Creating low-traffic neighbourhoods that are protected from motorised Through-traffic (as proposed by London Living Streets in response to the Councils consultation in November 2018). ❑ Increasing the use of non A & B roads for pedestrianised entertainment / retail areas / pocket parks. For example, the immediate vicinity of Brockley station has been temporarily pedestrianised to allow local cafes and restaurants to offer socially-distanced outdoor seating. This has been very successful and <p>2 should be made permanent. Furthermore it should be considered as a role model for other similar areas.</p>	<p>The plan also identifies a number of infrastructure projects to improve public transport within the borough.</p> <p>With regard to walking and cycling the Local Plan is underpinned by more detailed strategies such as the cycling strategy, transport strategy and Local Implementation Plan which have further detail on transport projects.</p> <p>Further information on the councils approach to LTNs can be found on the Council website</p>	
Brockley Better Streets	2	TR 01	<p>We note that other London boroughs have made significant progress in these areas over the last 18 months, successfully rebalancing road use away from cars towards cycling, walking and public transport. Proven templates exist that can easily be applied throughout the Borough as well, in particular in Brockley and Ladywel wards, where the traditional residential road grids in the conservation areas were designed to support local means of transport. These residential roads were never designed to support rat-running car traffic looking for the shortest route from A to B, which is always to the detriment of all residents along those routes.</p>	Information on the councils approach to LTNs can be found on the Council website	No change.
Hither Green West Campaign Group	2 3	TR 01 LCA	<p>Low Traffic Neighbourhood (LTN) for Hither Green West. The Plan notes the highly residential nature of Hither Green West but does not explicitly state our residential streets should be for people, not for cars. We want to reclaim our unclassified residential streets from commuter through traffic, to create spaces outside our homes where children can play and people can meet with their neighbours.</p> <p>Hither Green West campaign group fully supports the Council's drive to develop quieter, safer residential streets and to promote active travel. We have presented separately to Lewisham Council proposals for an LTN here, which, to date, is supported by a 765 signature petition. See: https://you.38degrees.org.uk/petitions/hither-green-west-catford-north-cell</p> <p>Creating a Low Traffic Neighbourhood here would:</p>	<p>Noted. The draft Local Plan broadly supports these aims, as helps give effect to the London Plan target for 90% of journeys made in inner London by walking, cycling and public transport.</p> <p>Low Traffic Neighbourhoods are outside the scope of the Local Plan. Comments will be forwarded to colleagues in Council's transport service.</p> <p>Further information on the councils approach to LTNs can be found on the Council website</p>	No change.

			<p>Extend to Hither Green West the benefits of quieter, safer streets which are currently being experienced by their neighbours in Lee Green.</p> <ul style="list-style-type: none"> • Remove up to 5 million vehicle movements and 400 thousand lorry movements from Hither Green Lane alone. • Resolve the significant increase in traffic volumes on Hither Green Lane and their attempts to use the very narrow junction to exit onto the South Circular, and the negative knock-on negative impacts on nearby narrow residential roads such as Torridon Road, Springbank Road, Ardgowan Road and Minard Road etc. • Would create a flagship low traffic neighbourhood with Hither Green Train Station symbolically at its heart. 		
London Wildlife Trust	2	TR 01	<p>We support in principle this policy. However, in Part E (or supporting para 12.5) we would suggest explicit reference to Policy GR3 as well; cycling infrastructure in our experience is not necessarily biodiversity sensitive in its design or location, and new routes need to take much better account of the needs of some wildlife.</p>	Support noted.	Supporting text amended to include a point about public realm and open spaces and biodiversity sites.
Port of London Authority	2	TR 01	<p>9. Policy TR1: Sustainable Transport and Movement.</p> <p>Support the reference to the promotion of the use of the river for passenger transport within the policy</p>	Support noted.	No change.
South East London Labour for a Green New Deal	2	TR 01	<p>“There is a need to support the modal shift away from use of the private car, in light of the London Plan target for 80% of all journeys in London to be made by non-car modes by 2041, including by supporting a more compact urban structure with a well-linked network of places and finer grained integration of land uses.”</p> <p>Does Lewisham have a traffic reduction target and how will it get there? What about HGVs which are highly polluting? The plan could be stronger on the need for major developments, construction and deliveries to provide freight consolidation strategies, potentially connecting with London-wide facilities and working with neighbouring boroughs where possible.</p>	<p>Noted. The London Plan sets a target for 90% of all journey in inner-London to be made by walking, cycling and use of public transport. The Local Plan helps give effect to this target with policies centres on encouraging modal shift and reducing car use.</p> <p>Draft Local Plan Policy TR5 Deliveries, servicing and construction addresses the points raised. The specific nature of proposals will be considered on a case by case basis as new development comes forward.</p>	No change.
South East London Labour for a Green New Deal	2	TR 01	<p>Similarly north-south directions in Lewisham are better served by public transport and east-west connections are also poorer; as a result far more trips are made by car and motorcycle to compensate for these deficiencies. Apart from increasing traffic, it also increases inequality as poorer people are far less likely to own cars. Reducing this car use depends not only on the BLE but also on improving bus and Network Rail services in these areas of poor PTAL (for example the riverside area where significant development is planned). They are similarly threatened by the funding crisis and because money is being spent on the Silvertown Tunnel which could be spent on these services. It could also be spent on decarbonising the bus fleet.</p>	<p>Noted and agreed. The draft Local Plan therefore includes policies which seek to improve public transport access across through Borough.</p> <p>The Council will continue to work with the Central Government, Mayor of London and developers to secure funding for new and improved transport infrastructure.</p>	No change.
Telegraph Hill Society	2	TR 01	<p>A key policy should be that any proposals to reduce traffic flows which have an effect on the redistribution of traffic across other roads should not result in an increase in traffic on roads which are primarily residential roads, etc. It was said</p>	The Local Plan is seeking to support the London Plans target of modal shift over the plan period. To reduce car traffic and increase more sustainable modes.	No change

			<p>during the on-line consultation sessions that there was no intention to divert traffic away from the main roads onto residential roads, but extreme care must be taken in this respect to ensure that it does not unintentionally do so. If traffic calming measures result in the creation of bottlenecks or a significant slowing of the traffic flow, it is naïve not to anticipate that through traffic, assisted by sat. nav. technology, will find alternative routes through residential streets. Attempts to block off those alternative routes merely cause the same problem elsewhere. The issues with some of the COVID-19 related traffic schemes have graphically illustrated these problems, with some residents caused to suffer additional traffic, noise and air pollution, in order to “calm” other roads. The policy should therefore expressly set out that the Council will not approve schemes (development schemes, traffic “calming” schemes or otherwise) that result in an increase in traffic on residential roads and that any proposed scheme will be required to demonstrate by robust, well-informed and transparent modelling that there will be no such effects. The Council should further require before-and-after studies for any implemented schemes with a commitment to reverse or modify such schemes if the modelling proves to be incorrect.</p>	Any proposals for road improvements will be thoroughly assessed so they do not have an adverse impact on residential streets.	
Telegraph Hill Society	2	TR 01	Specifically, in the context of paragraph 211 and Telegraph Hill, the Plan includes a proposal to remove the A2 New Cross Road/Amersham Gyratory system and we would hope that the modelling for this does not show an increase in traffic already voiding the system by using Telegraph Hill to access the A2 from the A21. We understand that this issue is already a matter of discussion between the Council and the Malpas Road Healthy Streets Group. We will strongly resist any proposal to modify that traffic system which results in an increase in traffic through Telegraph Hill.	Outside the scope of the Local Plan.	No change
Telegraph Hill Society	2	TR 01	As noted in our general comments in paragraphs 200 and 201 above, a major shopping issue with connectivity from New Cross Gate and Brockley is the lack of cross-Borough rail links to Lewisham and Catford. At present, in effect, the Borough is divided into two in terms of access by rail. Whilst, for New Cross Gate the link to Lewisham will be improved when the first stage of the BLE is built, the other issues will remain. The creation of a linking station at Brockley would be extremely useful in this regard and is considerably cheaper to implement than the BLE. We have been lobbying for this for at least 20 years with no success to date.	<p>The Local Plan has been prepared in collaboration with our transport team and informed by evidence base documents such as the Transport Assessment, Rail Strategy etc.</p> <p>The Council acknowledges the current issues with east west public transport connectivity and is working with transport providers to make improvements.</p>	No change.
Telegraph Hill Society	2	TR 01	We are pleased to note TR1.1 which, given the concerns over the pre-pandemic levels of overcrowding on the platforms at New Cross Gate station, we strongly support.	Support noted.	No change.
The St John's Society	2	TR 01	The 15-minute city would help promote local amenities and reduce car dependence.	Noted. The spatial strategy broadly supports this approach however it is acknowledged that this could be made more explicit.	Local plan amended to refer to 15-minute neighbourhood

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

		<p>the London Plan, and at a more detailed local level via this local plan, we think further specificity is desirable. In particular, the draft local plan is not sufficiently granular and should set out more clearly the reasons for safeguarding for the BLE, and the implications thereof, on a site by site basis. This should cover stations, work sites, the line and corridor, and associated works. (TfL can provide more detail upon request.)</p> <p>While the purpose of safeguarding and how it will benefit the borough is mentioned in the area visions, reference should be made to the formal safeguarding directions, and the definition of ‘Safeguarded Area’ should be added to TR1, TR2 or OL1. An example of appropriate wording is provided below.</p> <p><u>‘The Secretary of State has made formal safeguarding directions for the Bakerloo line extension which will support the project in safeguarding sites and routing alignment. The Bakerloo line extension will make a higher number of homes possible within the existing Opportunity Area and that proposed at Bell Green/Lower Sydenham. As such, the extension is a catalyst for change, providing an opportunity to enhance the transport offer at Lewisham town centre which will support and enable growth while also enhancing the public realm and connectivity. At Lewisham, it will also provide an improved strategic public transport hub with improved National Rail and DLR stations and bus services. The directions require the local planning authority to consult TfL on planning applications within the safeguarding zone’.</u></p> <p>Suggested additions for TR1 paragraph C and F: ‘C The land, buildings, space and supporting infrastructure required for the construction and operation of Lewisham’s network of strategic and other transport infrastructure will be safeguarded, including for the schemes identified in Table 12.1. New development proposals will be required to provide adequate protection for, and respond positively to the need to facilitate the delivery of the Borough’s network of transport infrastructure. <u>To support the Bakerloo line extension, developments will not preclude or delay the delivery, will not lead to excessive cost in the delivery, and must be compatible with the BLE (e.g., in relation to vibration from the tunnels), both during construction and in operation. Foundation and basement design will be particularly critical for over tunnel alignments, ground level needs at stations and for other work sites.’</u></p> <p>‘F Transport Assessments, Transport Statements and/or Travel Plans must be submitted with applications for Major development and other development proposals that are likely to impact on the capacity and functioning of the transport</p>		
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			network (including the walking and cycling networks, <u>deliveries and servicing, and the Bakerloo line extension</u>)....’ The formal safeguarding zone is now publicly available (https://content.tfl.gov.uk/ble-safeguarding-plans-march-2021.pdf), so we recommend these limits, specific sites and routing of any new infrastructure are set out in the policy maps.		
Transport for London	2	TR 01	G - Clarify that ‘B’ also includes walking and cycling transport infrastructure, as it could be understood to be limited to just public transport. TfL should be clearly identified as a consultee to evaluate the impact of development on transport infrastructure in addition to being consulted for alternative mitigation measures.	Agreed.	Local Plan amended with clarifications, as suggested.
Transport for London	2	TR 01 Para 12.3	TR.3 should just state Bakerloo line extension, as the point is valid regardless of whether the scheme terminates at Lewisham or Hayes and Beckenham Junction. A suggested edit is below. ‘12.3 The Bakerloo line extension to Hayes and interchange upgrades at Lewisham and Brockley stations are noteworthy as they are is vital to ensuring the development capacity of sites is optimised, and to addressing the increase in passenger demand arising from London’s growth’. This statement in 12.3 is incomplete: ‘An indicative list of strategic transport schemes is set out in...’	Noted.	Local Plan amended as suggested.
Transport for London	2	TR 01	In paragraph D, add the item below to the list: ‘d. Expansion of cycle hire’	Agreed.	Local Plan amended as suggested.
Telegraph Hill Society	2	TR 01	The site considerations also need to take into account transport capacity issues, particularly with reference to TR1 and, specifically, TR1.I .	Noted. Policy TR1 will need to be considered alongside the site allocations for planning applications and decisions, and it is not considered necessary to include additional site considerations in this respect. The plan must be read as a whole.	No change.
Transport for London	2	TR 01 Figure 12.2	The 400m catchments around the stations in Figure 12.2 are not justified. If they are intended to be walking catchments, then a 960m walk network (12-minute walk and that used in PTAL) or 800m crow flies (consistent with the London Plan and a proxy for a networked 960m catchment) would be more appropriate. In addition, Figure 12.2 shows a BLE catchment around St John’s station. This station is not a proposed BLE station and thus should not have a catchment around it. This will remain a National Rail station.	Noted. The 400m catchments have been included on the map to illustrate the area to which draft Local Plan Policy TR02.C relates. However for clarity the map will be amended to show the BLE phase one and indicative phase 2 routes only.	Diagram 12.2 amended to remove 400m catchments around stations.
	2	TR 02	The Bakerloo line extension has been shelved. This new reality needs to be reflected in the final edition of the plan and not be used as an excuse for overly intensive developments.	Noted. The Council is a strong advocate of the BLE and the benefits that this will bring to Lewisham residents. The BLE is included in the London Plan as a key transport project, which is also reflected in the Local Plan. We will continue to work with TFL and other key stakeholders to promote the strong business case and placemaking benefits of the BLE to secure future funding.	No change.

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

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

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

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

		<p>This seems to suggest that the South Circular, among the most important arteries in the area, is going to be carved up for cyclists and walkers? Surely Emergency vehicles must have unfettered access everywhere, be they fire engines, ambulance and/or police. If making places cycle safe relates to the closing of access to whole parts of the streets this will backfire. It has become clear that blocking roads, or narrowing them down substantially to create 'pedestrian and/ or cycling friendly areas'... is a failure. Traffic is merely shunted onto other streets and these become dangerously congested, with the same number of cars producing considerably more pollution than before.</p> <p>This is because as we all know: -Moving traffic reduces pollution while static, static and congested traffic increases it!, even with the same number of vehicles.</p> <p>EXAMPLE: The best recent example is the fracas around the Elephant and Castle. Removing bus lanes and car lanes to create vast cycle lanes that have, at best, a handful of mostly young cyclists, has simply meant that there are row-upon-row of buses, with large numbers of people aboard, (pre-pandemic, it was around 60 per bus) vans and cars bumper- to-bumper, barely moving, producing phenomenal amounts of pollution. This is clearly a planning failure.</p> <p>Cycle lanes do not need to be wider than 1 metre, max 2 metres if you want to have crossing points going in opposite directions. A whole (CAR) lane wide is absurd and causes more problems than it solves.</p> <p>Results: When bus lanes were first introduced, as a car driver, I was not happy. But I rapidly saw the benefits, as I realized that buses had become a genuine alternative to the tube. They could be reliable and fast. From New Cross Gate into town, for instance, the journey became a 30-minute trip, instead of the best part of an hour, as before. Sadly, since a myriad of cycle lanes started grabbing a lot of the space originally used by the bus lanes, I find I have had to revert to the tube, as the buses are no longer reliable. Being stuck on a bus, while three cyclists saunter past on a huge empty cycle lane is not a good feeling, to say the least!</p> <p>In many German cities, most pavements are slightly wider, with a green-coloured cycle path along them, that measure about a METRE wide- This is for cyclists. Pedestrians soon learn not to walk on the green stripe- Interestingly, this I have seen along the Old Kent Road going up to the Elephant & Castle, Very useful, effective and safe.</p> <p>However, if you are going to encourage cyclists then I suggest they should: -</p> <ol style="list-style-type: none"> 1. Have number plates so that they can be fined, like cars, for infringing the Highway Code. We are all fed up watching 	<p>Details of how cycling infrastructure will be delivered in the borough and in particular along key arterial routes will be brought forward with key stakeholders following Transport for London guidance. This includes following stringent guidance on emergency vehicular access.</p>	
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			<p>cyclists break the highway codes time after time with no penalties!</p> <p>2. Basic 3rd party insurance as it has been shown that they can cause death.</p> <p>3. A basic cycle-driving licence- This can be just a case of learning the Highway codes, the existence of which too few cyclists seem aware of.</p>		
	2	TR 03	<p>It's shocking that we can't find any plans for you to improve the experience for pedestrians to have beautiful, spacious, unpolluted and safe walking access across the borough....and local people will remain in cars until you do.</p>	<p>Noted. The Local Plan is a strategic document which sets out the council's aspirations and policies for managing change and growth within the borough. It includes policies setting out requirements for developments to deliver new and/or improved public realm, in accordance with the Healthy Streets Approach in the London Plan.</p> <p>Details on local priorities and projects can be found in the Transport Strategy and Local Implementation Plan (LIP) which forms a key evidence base for the draft Local Plan.</p>	No change.
	2	TR 03	<p>CS4 is slowing extending towards Greenwich, which is great and well over due, but I hope that this extends south at some point south through Lewisham borough towards Bromley / Crystal Palace.</p>	<p>Noted.</p>	No change.
Blackheath Society no 2	2	TR 03	<p>TR3 Healthy streets as part of healthy neighbourhoods. We support the aim of the policy. We have concerns about how to reconcile the conflict of maintaining flow along major movement corridors, especially those controlled by TfL (A2, A20, A21, A205) with improving walking/cycling/buses, reducing pollution and noise, and creating sense of permeable local places & neighbourhoods of high quality public realm and amenity. The same applies to minor but still busy movement corridors like the B212 through Blackheath. The draft Plan does not acknowledge this conflict or indicate how it is to be resolved when planning decisions are being made.</p>	<p>We recognise that some streets will still function as roads for carrying significant volumes of traffic. However we also believe that these streets can still be significantly improved to make the walking and cycling more attractive.</p> <p>TfL/GLA have detailed guidance on how this can be achieved</p>	Policy amended to make reference to guidance on Healthy Streets.
Blackheath Society no 2	2	TR 03	<p>TR3. No mention of Low Traffic Neighbourhoods (LTNs) anywhere in the document, despite their relevance to healthy and safe streets ('liveable neighbourhoods', 'active neighbourhood' and their topicality and indeed controversial status in Lewisham and other boroughs during the covid pandemic. A key issue for LTNs is adequate consultation with residents, with neighbouring boroughs if near a borough boundary (e.g. South Row/Kidbrooke Gardens SE3), and with TfL if near a main route controlled by them (ditto). This is because of their tendency to displace rather than reduce traffic, at least in the short term. Also no mention of School Streets initiative.</p>	<p>Noted. Low traffic Neighbourhoods are just one of many measures that Local authorities are exploring/utilising to make it safer to travel by foot or by bike and contribute to the achievement of the London Plan target for 80% of all Journeys in London to be made by walking, cycling or public transport by 2041.</p> <p>LTNs are however outside the scope of the Local Plan. We will pass your comments on to our Transport and Highways team who are currently working on the LTNs.</p>	No change.
Brockley Better Streets	2	TR 03	<p>Effective, concrete measures for eliminating rat-runs and reducing commuter car use needs to be included in the plan. Road infrastructure in the borough is currently biased towards car use and this needs to be re-balanced urgently. In particular, reducing the flow of vehicle commuter traffic on roads, between outer and inner London should be a specific target. This should be aligned to the London-wide target to</p>	<p>Noted. The draft Local Plan broadly supports modal shift and re-balancing road use as suggested. Further details on the strategic approaches are set out in the Part 2 Transport policies.</p> <p>Details on local priorities and projects being taken forward by the Council can be found in the Transport Strategy and</p>	No change.

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

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

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

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

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

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

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

			<p>people continue to organise home deliveries, then large supermarkets will become redundant. However, many would like to shop in a large retail unit if the council or some other organisation were to provide home delivery by electric vehicle, or other less polluting solution. Older and frail customers could shop and arrange for their purchases to be taken home. Some such arrangement will need to be in place if Leigate and the Sainsbury's site, and Catford town centre, are to thrive. It should also be borne in mind that once Covid is over, even the young and fit will not have enough time to walk or cycle everywhere, when their children's busy social lives resume. Cars cannot be simply wished away.</p>	<p>seeks to ensure that people in Lewisham can easily access jobs, services and community facilities, and leisure and recreation opportunities.</p>	
Lewisham Pedestrians	2	TR 04	<p>Principles for determining planning applications – the Local Plan</p> <ul style="list-style-type: none"> • Applications for crossovers and planning applications that include any crossovers must demonstrate the use of both contrasting colour and texture surfaces to indicate a hazard. This will encourage people to walk by reducing the risks arising from the introduced hazard of collision with moving vehicles. This especially applies to children, people with vision impairment and people relying on guide/assistance dogs. • Applications that include kerbed vehicle access across the footway must demonstrate that absolute pedestrian priority is clearly indicated. • Place all residential parking (except disabled parking for residents and visitors) to the edges of housing developments so that if private vehicle ownership declines then that space can be re-purposed as green space. • Residents of new single and multiple dwellings should not be allowed Lewisham residential on-street parking permits. This condition would apply to all future residents and would also exclude those residents from participating in controlled parking zone consultations. • Each off-street motor vehicle parking space must have electric-vehicle charging functionality – this should apply to all applications that include any motor vehicle storage space. We note that the current draft of the Local Plan shows a very disappointing 20% requirement only. 	<p>Noted. The parking policies have been updated to align with the London Plan standards, including reference to the London Cycle Design Standards and additional signposting of streetscape guidance documents. These policies, in combination with policies on public realm, are considered to provide a sufficient strategic approach.</p>	<p>Local Plan Parking policies reviewed and updated. Additional signposting of streetscape guidance document.</p>

			<ul style="list-style-type: none"> Applications for electric charging facilities on the private realm that has any public pedestrian access must demonstrate that no trip hazards are introduced. 		
Make Lee Green	2	TR 04	<p>Action on Parking Part of the solution to uncontrolled car use should be to gradually restrict parking. London has two parking spaces for every car and not enough homes for every person. Our priorities need to change.</p> <ul style="list-style-type: none"> Car-free residential developments should be the norm rather than the exception. Residents' car-parking charges should reflect the full cost of the pollution and environmental damage caused by specific vehicle types Residents should be able to install secure bicycle and mobility scooter parking anywhere that privately owned cars can be parked 	<p>Noted. The Local Plan and the London Plan has stringent policies on car parking, promoting car free development in accessible locations and 'car lite' development elsewhere. This is assessed through the Development Management processes and is supported by Travel Plans and Transport assessments. These measures along with others within the draft Local Plan are and will continue to reduce car borne traffic generated by new development.</p> <p>The Local Plan supports the use of CPZs across the borough to manage parking demand. Please see TR4 Parking. The Council has recently committed to rolling out CPZs across the borough where they are supported</p> <p>Car parking charges are outside the scope of the Local Plan.</p>	Local Plan amended in order that parking policies are in general conformity with London Plan policies on car-free and car-lite development.
South East London Labour for a Green New Deal	2	TR 04	The local plan also comes across as weak when it comes to car-free development and reduction in the number of car parking spaces, in particular on-street. A more ambitious strategy of car parking reduction, integrated with LTNs, healthy streets and corridors, and public transport, should be developed for the borough. This is in line with international best practice, using major redevelopment to support active travel and public transport and reducing and consolidating car parking provision (except for disabled parking as per London Plan policies).	Noted. The London Plan has stringent policies on car parking, promoting car free development in accessible locations and 'car lite' development elsewhere. It is acknowledged that amendments to the Local Plan parking policies are required to bring them in line with the London Plan.	Local Plan amended in order that parking policies are in general conformity with London Plan policies on car-free and car-lite development.
Telegraph Hill Society	2	TR 04	The proposal for the Sainsbury's/Mount Anvil development at New Cross Gate generated considerable opposition from residents because of the lack of parking in the development. The creation of Controlled Parking Zones (CPZs) in the local area as a solution to this was felt to be an unacceptable burden to existing residents. It was felt totally unfair that a new development should impose a burden both in cost and inconvenience on existing residents, by taking away, without compensation, their rights to free street parking. The first sentence of policy TR4.F therefore gives us considerable concern as it appears not to take into account the impact of such a development on existing residents. Developers should pay for the disadvantages that their development creates for existing residents and this should be made clear in the policy.	<p>The London Plan includes stringent policies on car parking, promoting car free development in accessible locations and 'car lite' development elsewhere. Car free development still includes provision for blue badge parking. The Local Plan must be in general conformity with the London Plan.</p> <p>The Local Plan supports the use of CPZs across the borough to manage parking demand. Please see TR4 Parking. The Council has recently committed to rolling out CPZs across the borough where they are supported</p>	No change.
Telegraph Hill Society	2	TR 04	The first sentence of TR4.F should be deleted and the remainder of that policy applied to all developments. If it is to remain, despite our concerns, it should be reworded to say <i>"Development proposals for car-free development will only be supported where they are located in highly accessible locations and locations well-connected by public transport with suitable capacity to service the demand from the development and it</i>	Noted	Local Plan amended in order that parking policies are in general conformity with London Plan

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

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

			<p>D - We commend establishing a parking hierarchy that distinguishes between potentially more genuine need and simply choice. However, in the London Plan, both disabled persons car parking and cycle parking are required, and as such, are equally important. Whilst car clubs can be useful in supporting a car-free lifestyle, they can also result in people switching from more sustainable modes, and for this reason we would urge care in their promotion when compared to active travel and public transport. The best way to implement them is with an attendant reduction in the overall volume of parking spaces in an area because it is likely that a car club car is more intensively used than a privately owned one, and simply adding car clubs into the mix without reducing parking for privately owned parking will risk increasing car travel and dominance. In new developments, car clubs should be deployed where they can provide for occasional car use for households that are prevented from owning their own car. As such, they are best deployed where parking levels are very low. It should be noted that car club bays, as well as Blue Badge parking count towards the maximum car parking quantum set out in the London Plan (10.6.4). We strongly advise clarifying that c, d, e and f need not be part of all developments, which is included in supporting text but requires strengthening. London-wide evidence (LTDS) shows a correlation between income and car ownership, rather than the presence of children in the home and car ownership. This is why the London Plan has departed from the previous approach as it was shown to be not evidence-based. As such, ‘family dwelling parking’ in (D)(d) should be removed. Any vehicle parking beyond disabled persons parking (a) and car clubs (c) should be allocated on short-term leases as set out in the London Plan (Policy 10.6.14). This is to enable flexibility which is required as circumstances change. Equally, disabled persons parking should not be allocated to a dwelling, but instead cater for parking for a variety of Blue Badge holders, or allocated to a specific person. This is required so that turnover of residents does not lead to a disabled persons parking space being allocated to a household with no Blue Badge holders.</p> <p>F - Car-free development should be the starting point for discussions at all development, as set out in Policy T6B. The wording of this section can be modified to create a more positive parking policy that will help focus on how to plan to create conditions conducive to car-free living rather than being limited by status quo and existing poor conditions. Use of ‘highly accessible’ in the leading statement may be understood as supporting car-free developments in areas that are accessible for disabled people. Use of ‘well-connected’ is preferred for clarity. We recommend that the leading statement and subsequent sub items be modified as follows:</p>		
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			<p>‘Development proposals for car-free development will be supported where they are located in <u>highly accessible and well-connected</u> locations. Elsewhere, car-free developments will only be supported where it can be suitably demonstrated that:</p> <p>a. The development is appropriately located at a well-connected and accessible location <u>with good walking and cycling access to local services/amenities;</u></p> <p><u>b. The development is in an Opportunity Area or town centre, or in an area with plans for significant growth or change that will bring about attractive conditions for walking, cycling and access to local services;</u></p> <p>b. The development is located within an existing Controlled Parking Zone (CPZ), or it can be demonstrated that there is no capacity on the existing local road network to accommodate the parking demand generated by the development.</p> <p>c. There is sufficient capacity on the public transport network <u>or potential for active travel interventions or implementation of LTNs</u> in the locality to <u>sustainably</u> cater to the additional demand arising from the development, taking into account existing and planned transport infrastructure; and</p> <p>d. There <u>is an existing Controlled Parking Zone (CPZ) or a future CPZ can be established through planning contributions.</u> will be no adverse impact on existing provision of on-street parking’;</p> <p>We agree with the Council that the status-quo needs to be addressed with positive planning and innovative policies. With ULEX, CPZs will be more important than ever to protect resident amenity and mitigate impacts of growth by minimising any additional vehicular traffic. Provision of off-street parking to address on-street parking stress does not address the challenges faced by existing residents (finding parking or dealing with congestion), nor does it address the potential for competition for town centre or other destination parking. To truly mitigate the impacts of development, new residents should not be enabled to travel by car.</p> <p>Policy T6C of the London Plan clearly states that the lack of a CPZ should not be a hindrance to development and it does not preclude developments from complying with parking standards. The proposal to permit parking on-site where on-street parking exists fundamentally undermines this approach and could contribute to making poor use of land and/or reducing the provision of affordable housing and other infrastructure due to the cost of digging costly basements. Therefore, the solution to parking stress is to manage demand through the introduction of CPZs and capping permits so residents of new development are unable to obtain them. CPZs can be paid for by developers through planning obligations and</p>		
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			<p>can improve amenity for existing residents (whether they own a car or not), as well reserve spaces on local streets for residents only.</p> <p>Part H should make it mandatory that any new development that is required to be car-free should also be permit-free.</p> <p>Part I should include passive provision for all remaining spaces for residential development, not just 40 per cent, in line with the London Plan policy T6.1(C). Different requirements apply for parking associated with other use classes, so it would be easier to refer to the London Plan.</p> <p>J - The London Plan requires all developments (not just major developments) with parking to submit a Parking Design and Management Plan (PDMP) so that consideration can be given to: the provision of electric vehicle charging points, how Blue Badge spaces will be provided upon request, or how space might be converted in future as needs change. Part (J) says that cycle parking provision should be considered by PDMPs. The detail of proposed cycle parking provision should be included in the planning application, including number of spaces for short stay, long stay, adapted cycles, etc., with the PDMP covering issues of management and design of such areas.</p>		
Blackheath Society no 2	2	TR 05	<p>TR5 Deliveries, construction and servicing. We support the policy aim. We have concerns about the impact of additional traffic generated by new developments, especially ‘car free’ ones, on major movement corridors and local amenity (e.g. in Lewisham town centre, which remains congested at peak times despite major expensive road remodelling).</p>	Support noted. The London Plan has stringent policies on car parking, promoting car free development in accessible locations and ‘car lite’ development elsewhere. The overall approach advocated is to reduce car use. Development proposals will need to be accompanied by Transport Assessments to consider impacts on the highway network.	No change.
Climate Action Lewisham	2	TR 05	<p>With a view to encouraging active travel and a small-business-based local economy, supporting last-mile delivery hubs (p460; 12.30) is an excellent idea, which will help congestion on suburban roads and encourage engagement with local businesses.</p>	Support noted.	No change.
Deptford Society	2	TR 05	<p>Page 459 TR5 Deliveries, servicing & construction. The policy relating to requirements for new developments could be strengthened, for example capping delivery numbers to force micro-consolidation, allowing access for only for low emission vehicles etc.</p> <p>There is also nothing about identifying/protecting small sites for the micro-consolidation centres – the north of the borough should be a target area for these facilities.</p>	Noted. It is not considered appropriate or feasible to cap delivery numbers. However, development proposals will be required to include Transport Assessments, along with Delivery, Servicing and Construction Management plans, where appropriate. This will help the Council to consider impacts of development and secure measures to appropriately manage the use, for example, by planning conditions.	Local Plan policy TR5 amended to include additional point on shared micro storage and distribution facilities.
Lewisham Cyclists	2	TR 05	<p>On page 460 - last mile delivery we support this although we’d like to see the Council supporting e-cargo bike delivery companies as well as encouraging mutual storage and warehousing facilities at strategic points such as to provide delivery hubs for both Lewisham and Catford Town Centres.</p>	Noted.	Local Plan policy TR5 amended to include additional point on shared micro storage and

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

					infrastructure to address gaps/barriers.