

Lewisham Local Plan

Regulation 18 consultation statement

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

September 2022

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Organisation (if relevant)	Part	Section, policy or paragra ph	Comment	Council officer response	Action
L&Q Group	-	General	Moreover, at 865 pages, we consider the draft Local Plan is too long and could be shortened considerably. The Planning White Paper “Planning for the Future” (August 2020) directs that Local Plans should set clear rules rather than general policies for development, should be significantly shorter in length, and limited to no more than setting out site- or area-specific parameters and opportunities. In instances it is considered with appropriate checks in place via planning application requirements, could result in the removal of significant reduction in length of policies e.g. SD12 Ground Conditions; and number of design policies which are effectively repeats of the London Plan policies e.g. QC5 View Management and QD6 Optimising Site Capacity.	Noted. Policies have been included within the Local Plan where they provide useful local interpretation, to aid the implementation of the London Plan policies. It is acknowledged that there is some repetition of London Plan policies in parts of the plan however this is similar to approach taken by other London boroughs in their plans.	Local Plan reviewed and amended to reduce repetition and make more concise.
Artworks Creekside (Avison Young obo)	1	Vision and Strategi c Objectiv es	<p><i>Relates to Part 3, LNA SA 16</i></p> <p>Artworks Creekside support the Vision for Lewisham as set out in the draft Local Plan, that Deptford will emerge as a cultural hub and that the Council will supports local businesses, arts and cultural establishments, and where people thrive.</p> <p>The Strategic Objectives which accompany the Vision support the creation of inclusive, mixed and balanced neighbourhoods, making the best use of employment land to increase the number of jobs and provide suitable spaces for businesses, and making optimal use of land through the regeneration of Opportunity Areas.</p>	Support noted.	No change.
Tribe Student Housing (Avison Young obo)	1	Vision and Strategi c Objectiv es	<p><i>Relates to Part 3, LNA SA 06</i></p> <p>Local Plan: Main Issues and Preferred Approaches Document The draft Local Plan sets out a shared vision for the future of the Borough through to 2040. The Plan identifies a number of strategic objectives for the borough over this timeframe, including meeting population growth and housing need, economic growth and job opportunities and creating healthy and safe communities. Our client supports the aspirations for the Local Plan.</p>	Support noted.	No change.
Trundley’s Road Ltd (Avison Young obo)	1	Vision and Strategi c Objectiv es	<p><i>Relates to Part 3, LNA SA 06</i></p> <p>Local Plan: Main Issues and Preferred Approaches Document The draft Local Plan sets out a shared vision for the future of the Borough through to 2040. The Plan identifies a number of strategic objectives for the borough over this timeframe, including meeting population growth and housing need, economic growth and job opportunities and creating healthy and safe communities. Our client supports the aspirations for the Local Plan.</p>	Support noted.	No change.
Fifth State and (Avison Young obo)	1	Vision and Strategi c	<p><i>Relates to Part 3, LNA SA 16</i></p> <p>The Owners and Developer support the vision for Lewisham as set out in the draft Local Plan, in particular that Lewisham will continue to be a dynamic place</p>	Support noted.	No change.

		Objectives	<p>which supports local businesses, arts and cultural establishments, and where people thrive.</p> <p>The Strategic Objectives which accompany the Vision support the creation of inclusive, mixed and balanced neighbourhoods, making the best use of employment land to increase the number of jobs and provide suitable spaces for businesses, and making optimal use of land through the regeneration of Opportunity Areas.</p>		
Freeths LLP (K/S Lewisham obo)	1	Vision	<p>K/S supports as a matter of principle the strategic growth aims of the Local Plan, particularly as they relate to Lewisham Town Centre where the Site is located. As a committed investor and manager in the Town Centre, K/S welcomes the direction and vision identified in the Plan as it is essential that there is a clear and ambitious set of objectives for the Town Centre so it can continue to evolve and grow particularly against the challenging economic and social backdrop.</p>	Support noted.	No change.
Tetra Tech Planning (John Lyon's Charity obo)	1	Vision	<p>The Vision for Lewisham Is there anything you would like to see changed from the Vision for Lewisham?</p> <p>The Council's website states that "The Local Plan presents a vision for how development should shape Lewisham over the next 20 years". We consider that "the Vision" (Page 48) as currently set out fails to do that, instead it makes generalised aspirations such as "We will give people the security and certainty they need so that everyone can live their best lives" and "A place that people want to visit and live in, and where they choose to stay and enjoy a good quality of life". The vision fails to articulate the proposed regeneration, growth and investment considered within Section 3 of the Local Plan; and therefore fails to reflect the "Good Growth Strategy". It fails to provide a direction of travel for the Plan period; and fails to demonstrate how the vision could be delivered through its planning policies. "The Vision" as worded could be describing any town in the UK.</p> <p>A vision needs to be clear, concise, aspirational but realistic. The Vision for Lewisham needs to reflect Lewisham's priorities, describe where and how change will happen and provide a clear sense of how the borough will look in 2040, while operating as a tool to measure the success of the Local Plan. As written, the Vision does not fulfil its requirements.</p>	Noted. The Vision is an overarching, aspirational statement. Further details to help give effect to the Vision are included in the Strategic Objectives. Policy OL1 builds on this to provide details of the spatial strategy and delivery throughout the plan year period. It is noted that each character area in Part 3 includes a more detailed vision, as indicated in the representation, which links to the Borough vision.	No change.
GHL (Leegate) Limited (Frank Knight obo)	1	Strategic Objectives	<p><i>Relates to Part 3, LEA SA 03</i></p> <p>Part 1 - Strategic Objectives and the Spatial Strategy The Council have identified that the overall strategic objective over the plan period to 2040 is to sustain and create inclusive neighbourhoods and communities that both reflect and reinforce the diversity and cultural heritage of Lewisham's people and places, by coordinating investment in such a way as to promote equality of opportunity for everyone to enjoy a good quality of life in Lewisham (Strategic Objective A.1). The Council will achieve this through providing housing tailored to the community with genuinely affordable homes (Strategic Objective B).</p> <p>The Council set out that the strategic objectives will be achieved by ensuring that the spatial strategy directly addresses the Local Plan objectives and provides a land use and planning framework to manage growth and guide investment over the next 20 years.</p>	Noted.	No change.

GHL (Leegate) Limited (Frank Knight obo)	1	Strategic Objectives	<p>The spatial strategy states that new investment will be directed to the borough’s strategic areas for regeneration, and other local areas for regeneration, to help tackle deprivation and ensure equality of opportunity. Indeed, GHL supports the Council’s vision and objectives for strategic regeneration. But, we note that proposed site allocations, such as Leegate Shopping Centre, should be regarded as a local area for regeneration such that they can perform a key role in meeting the Council’s overarching vision for the regeneration of the borough, recognising how on-going regeneration of site allocations can act as a catalyst for the improvement of areas such as Lee Green.</p> <p>As such, we request that the Council identifies site allocations as appropriate locations to direct regeneration. This approach would align with National Planning Policy, which promotes the effective use of land, stipulating that strategic policies should <i>“make as much use as possible of previously-developed or brownfield land”</i> (Paragraph 117 of the NPPF).</p> <p>In this regard it is noted that, through the redevelopment of their land interest, GHL is well placed to assist in delivering the Council’s strategic objectives and spatial strategy. Indeed, GHL’s commitment to the regeneration of the Leegate Shopping Centre is demonstrated through on-going engagement with the LPA and other key stakeholders.</p> <p>Overall, GHL supports the Council’s strategic objectives and spatial strategy for the regeneration of the borough and Lee Green District Centre, including the continued focus on making the best use of land and space, and prioritising the redevelopment of brownfield land for new housing, along with optimising the development of site allocations and other smaller sites across the Borough.</p>	Noted. The spatial strategy sets out areas for regeneration consistent with the London Plan and based on local evidence. The Local Plan makes clear the opportunities for regeneration and revitalisation within Lee Green area and the shopping centre site.	No change.
Tetra Tech Planning (John Lyon’s Charity obo)	1	Strategic Objectives	<p>Strategic Objectives Do you have any comments on the strategic objectives?</p> <p>The strategic objectives are clear and represent the key issues for the Council. The majority are locally distinctive. We note Strategic Objective H: “Securing the timely delivery infrastructure” and this includes the delivery of the Bakerloo Line Extension (BLE). The Charity commends the Council’s positive approach to its delivery, and in parallel, we also welcome the Council’s pragmatic approach to the BLE which is set out in the Spatial Strategy Options (please see below for further comments).</p>	Support noted	No change.
Tetra Tech Planning (John Lyon’s Charity obo)	1	Spatial Strategy Options	<p>Do you have any comments on the spatial (growth) strategy scenarios and associated options?</p> <p>Scenario 1, which depicts no BLE, is the “baseline scenario”. This scenario brings forward areas which are a “focus for growth” and a “focus for regeneration” across the Borough, which is fully supported by the Charity. Notwithstanding the absence of the BLE, we note that the Bell Green/Lower Sydenham area is “a focus for regeneration” and the “Site Allocations” outlined within Section 3 of the Regulation 18 Local Plan are taken forward, which is also welcomed and supported by the Charity.</p> <p>Scenario 2, which depicts BLE Phase 1 only, again brings forward those areas which are a “focus for growth” and a “focus for regeneration” which again is fully supported by the Charity.</p>	Support for the differing scenarios and a higher growth strategy should BLE Phase 2 come forward is noted. Agree with the need to ensure consistency between residential units between the Local Plan and the IIA.	<p>Local Plan and IIA have been amended to ensure consistency in residential units.</p> <p>AECOM</p>

			<p>Scenario 3, which depicts both BLE Phases 1 and 2, maintains the approach taken in Scenarios 1 and 2 and also brings forward “intensification in Bell Green”, and “additional intensification in Bell Green”. Frustratingly, there is no further detail provided on the three scenarios within this section of the Local Plan, with paragraph 3.18 stating that “The IIA should be referred for further details on the options as well as assessments of their likely social, environmental and economic impacts”. A review of the Integrated Impact Assessment (IIA) provides clarification on the further details of the scenarios. We note that the Council has undertaken initial work to understand the potential to achieve higher densities at the six Bell Green/Lower Sydenham sites under a scenario with BLE Phase 2; and this could provide as much as 200% uplift in development densities (we understand this to be the “additional intensification”), with 100% also considered appropriate (we understand this to be “intensification”). Table 5.7 within the IIA presents the reasonable growth scenarios in terms of housing numbers for each scenario. The baseline position (Scenario 1) provides for 1,540 units for the six sites and this remains unchanged under Scenario 2 (this figure is in line with the (minimum) “1,543 units” calculated for those six sites in the Site Allocations section of the Local Plan). However, Table 5.7 presents 3,090 units for the 100% uplift scenario and 4,630 units for the 200% uplift under Scenario 3. When adding the maximum indicative housing numbers from the six allocations, there is a total of 3,778 units, which is 851 units less than the 200% uplift number in the IIP. Further clarification is required on the change in unit numbers.</p> <p>The focus for growth and regeneration regardless of BLE is wholly supported and the ambition of the higher growth strategy should the BLE Phase 2 come forward, specifically the higher densities in Bell Green/Lower Sydenham is commended.</p>		
Tetra Tech Planning (John Lyon’s Charity obo)	1	Figure 3.8	The Proposed Growth Strategy (Figure 3.8) now presents “Growth Nodes” and “Regeneration Nodes” as opposed to “Focus for Regeneration” and “Focus for Growth” and the nodes represent wider areas. This Preferred Option presents both Phases 1 and 2 of the BLE.	Comments noted.	Section revised to provide clarity
Tetra Tech Planning (John Lyon’s Charity obo)	1	OL 01	<p>The Preferred Option, Policy OL1 (d) directs new investment to the Borough’s Strategic Area for Regeneration, and other local areas for regeneration, and the Charity supports this designation and the Regeneration Node assigned to Bell Green/Lower Sydenham.</p> <p>Policy OL1 (e) sets out that new and improved community and strategic transport infrastructure including the BLE, will be a catalyst for investment and will unlock the development potential of the Borough. The Charity fully agrees with this view but the absence of BLE Phase 2 should not preclude development or the potential for transformational change to the south of the Borough.</p>	Noted.	Local Plan amended to reflect that growth and development in the south of the borough is not contingent on the BLE but the BLE will help to improve accessibility and optimal use of land.
Transport for London Commercial Development	1	OL 01	<p>OL1 Delivering an Open Lewisham</p> <p>TfL CD supports Policy OL1 criterion Ad which directs new development to principal transport routes, nodes and interchanges. However, TfL CD consider that Policy OL1 should promote development in areas which are well-connected more generally and not just at ‘principal’ locations.</p>	Support noted.	Local Plan spatial strategy amended to promote development in areas which are well-connected.
Fifth State and (Avison Young obo)	1	OL 01	<p><i>Relates to Part 3, LNA SA 16</i></p> <p><i>Draft Policy OL1 - Delivering an Open Lewisham (spatial strategy)</i></p> <p>The Owners and Developer of 5-9 Creekside strongly support the strategy to deliver an Open Lewisham as set out in draft Policy OL1. Ensuring that the growth and regeneration potential of Lewisham’s Opportunity Areas, including Deptford</p>	Support noted.	No change.

			Creek / Greenwich Riverside, are fully realised (part a), and promoting the optimisation and intensification of Strategic Sites (Part F) will ensure that development potential is able to be maximised and will encourage the most efficient use of land, in line with paragraph 122 of the NPPF. Fifth State also support Part G of the draft policy which requires development to be delivered through a design-led approach which is informed by an understanding of the local area character in order to secure liveable communities that are inclusive to all.		
L&Q Group	1 1	OL 01 Para 3.40	<i>Relates to Call for site</i> 3. Overview of Representations L&Q is supportive of the overall vision of London Borough Lewisham (“LBL”) and your aim to plan positively to meet identified development needs through the draft Local Plan. This includes supporting well integrated, higher density and mixed-use developments (para 3.40). However, there are some areas in the draft Local Plan where L&Q consider amendments and / or more detail is required to make the policies more usable and effective.	Support noted.	No change.
Yorkshire & Clydesdale Bank Trustees Ltd c/o CBRE Global Investors (Montagu-Evans obo)	1	OL 01	<i>Relates to Call for site</i> Policy OL1 Delivering an Open Lewisham (spatial strategy) Draft Policy OL1 sets out the Council’s strategic policy on delivering its core objectives for meeting development needs, which focuses on ensuring the growth and regeneration of Opportunity Areas are realised, as well as directing investment to Areas of Regeneration. Draft Policy OL1 goes on to note the Council will proactively seek to make the best use of land by prioritising the redevelopment of brownfield land for housing and workspace, including through intensification. We consider this approach to be logical and compliant with national policy, which requires optimisation of previously developed land for development, and patterns of growth to be focused on locations which are sustainable, thus reducing the need to travel and offering a choice of transport modes. Through application of these criteria, the Council identifies Deptford Creek / Greenwich Riverside Opportunity Area as a location that will accommodate a significant proportion of the Council’s growth, which is to be focused on site allocations in the emerging Plan. We support the general acknowledgement from the Council that high density, strategic scale development will be encouraged in such locations, which is consistent with the London Plan, but recommend that Policy OL1 explicitly supports opportunities to intensify and make more efficient use of designated employment land as this is fundamental to the deliverability of the emerging Plan. As a result it should be fed into the Plan’s overarching policy which then cascades through its employment policies where a number of designated employment sites are recommended for allocation.	Noted. The spatial strategy sets out principles for locations to direct growth and development, whilst making the optimal use of land. It is does not necessarily distinguish between different types of uses. Making the optimal use of employment land is clearly set out in the Part 2 policies on Economy and Culture, which builds on the spatial strategy.	No change.
Albacore Meeting Room Trust (Lichfields obo)	1	OL 01	<i>Relates to Call for site</i> (b) Spatial Strategy Options: (OL1) Delivering an Open Lewisham (Spatial Strategy) Following from this, the Trust supports LBL’s intention to direct new investment to the strategic area for regeneration, which includes Beckenham Hill road (‘part b’). The Trust particularly supports part ‘f’ of OL1 which states the Borough’s intention, in line with National and London Plan Policy, to proactively seek to	Support noted. Optimising the use of brownfield sites is reflected in the spatial strategy and elsewhere in the plan.	No change.

			<p>make the best use of land and space and prioritise the redevelopment of brownfield land to meet local needs.</p> <p>Part ‘g’, which requires all new development to be delivered through the ‘design-led approach’, is also supported. It will be important to ensure that LBL optimises use of its brownfield land to assist with meeting development needs, including for community uses. This approach is supported by the NPPF (paras 117 and 118c).</p>		
GHL (Leegate) Limited (Frank Knight obo)	1	OL 01	<p>Policy OL1 (Delivering an Open Lewisham – Spatial Strategy) explains that the Council will promote a vibrant and diverse multi-centred borough by directing new residential, commercial, community, leisure and cultural development to Lewisham’s town, district and local centres, in order to support their vitality and long-term resilience. LBL will ensure that district centres, such as Lee Green, retain their distinctive features, whilst evolving in their function as key hubs of community, cultural and commercial activity.</p> <p>GHL broadly supports the proposed strategic priorities and spatial strategy in the Lewisham Local Plan Review, and it is welcomed that the Council acknowledges, and intends to respond to, the need for flexibility of land uses within Lewisham’s town, district and local centres.</p>	Support noted.	No change.
LaSalle Investment Management (Savills obo)	1	OL 01	<p><i>Relates to Part 3, LSA SA 10</i></p> <p>Part One: Vision, Strategic Objectives, and the Spatial Strategy</p> <p><i>OL1 Delivering an Open Lewisham</i></p> <p>LSIM support the Vision, Strategic Objectives and Spatial Strategy for the Borough. This specifically includes the intention to facilitate new development along the north-south A21 corridor (Lewisham High Street, Rushey Green and Bromley Road).</p> <p>To help realise these aspirations, LSIM would strongly advocate that the Council captures greater potential for the redevelopment and / or intensification of existing commercial ‘brownfield sites’ within the spatial strategy. Such sites provide an opportunity for intensification of quantum and diversification of uses, including residential, which may support the existing commercial operations that exist.</p> <p>The aspiration to evolve from single use areas to mixed use neighbourhoods, including the provision of higher densities, is essential in order to deliver the wider objectives relating to growth. Critical to the success of the transformation will be the integration of old and new and the Plan needs to establish some clear objectives to ensure that goal is achieved.</p>	<p>Support noted.</p> <p>Support is noted. The Local Plan already identifies a range of brownfield sites for redevelopment, mixed uses, intensification, diversification within town centres and co-location on selected suitable sites whilst protecting SIL, LSIS and non-designated employment areas. Strategic objectives in the Local Plan include positively managing the delivery of new homes across the Borough and making the best use of employment land. The policy also seeks to make the best use of land and space by prioritising the redevelopment of brownfield land and enabling the sensitive intensification of established residential neighbourhoods and commercial areas. Optimal</p>	No change.

				capacities for sites will be established at planning application stage through a design led approach.	
Artworks Creekside (Avison Young obo)	1	OL 01	<p><i>Relates to Part 3, LNA SA 16</i></p> <p>Comments on Local Plan Main Issues and Preferred Approaches Document</p> <p>A series of comments are provided below in respect of various sections of the Local Plan Main Issues and Preferred Approaches Document which are of relevance to the proposed redevelopment of 2 Creekside and 3 Creekside.</p> <p><i>Draft Policy OL1 - Delivering an Open Lewisham (spatial strategy)</i></p> <p>Artworks Creekside strongly support the strategy to deliver an Open Lewisham as set out in draft Policy OL1, in particular the strategic objective of ensuring that the growth and regeneration potential of Lewisham’s Opportunity Areas, including Deptford Creek / Greenwich Riverside, are fully realised (part a), and promoting the optimisation and intensification of Strategic Sites and brownfield land for new housing and workspace (Part f) will ensure that development potential is able to be maximised and will encourage the most efficient use of land.</p> <p>Artworks Creekside also support Part g of the draft policy which requires development to be delivered through a design-led approach which is informed by an understanding of the local area character in order to secure liveable communities that are inclusive to all.</p>	Support noted.	No change.
L&Q Group	2	Section 5	<p><i>Relates to Call for site</i></p> <p>4. Detailed Comments</p> <p>The following summarises L&Q’s comments on relevant policies of the Local Plan in turn.</p> <p>4.1 High quality design</p> <p>L&Q supports the Council’s ambition for new developments to be design led to deliver high-quality inclusive developments, which responds to the local context alongside considering the most optimal use for the land, to support the delivery of LBL spatial strategy.</p>	Support noted. Comments to additional representations set out elsewhere in the Consultation Statement.	No change.
Tetra Tech Planning (John Lyon’s Charity obo)	2	Chapter 05	<p>High Quality Design</p> <p>Do you agree that the Local Plan has identified all of the issues around design quality?</p> <p>Yes, the design chapter is very detailed, covers all expected areas and broadly accords with policies within the new London Plan (2021). The Charity supports a design-led approach to all development proposals.</p>	Support noted.	No change.
L&Q Group	2 2 2 2	QD 01 QD 04 Para 5.31 Figure 5.1	<p><i>Relates to Call for site</i></p> <p>Tall buildings</p> <p>This includes optimising the use of land through comprehensive redevelopment of strategic sites (i.e. site allocations) and recognising it may be necessary to build higher in some places, including tall buildings, so they can support the strategic objectives of the borough, and deliver wider public benefits such as genuinely affordable housing (para 5.31).</p> <p>The Lewisham Characterisation Study (2019) provides an analysis of the character of various areas within the borough. L&Q supports LBL’s recognition in Policy QD1 (Delivering high quality design in Lewisham) that proposals should</p>	Noted. Noted. In response to public consultation feedback on the Regulation 18 plan, it is considered necessary to update Policy QD4 to ensure conformity with the London Plan, and also taking into account the Tall Buildings Study Addendum (2022).	<p>Policy QD4 amended throughout to ensure conformity with the London Plan, with revisions also informed by the Tall Buildings Study Addendum (2022).</p> <p>Policy QD4 amended to include reference to DM4 (Masterplans and</p>

			<p>take account of the “prevailing and emerging form of development”. Taking that into account, L&Q agree it is appropriate that all of Deptford is considered suitable for tall buildings, as shown in Figure 5.1.</p> <p>Policy QD1 C) indicates that proposals for taller buildings will be considered having regard to the emerging context and criteria QD4.B(e)- QD4.B(f) above. However, item QD4.B(f) is missing from the text so we do not know what the final criteria is in this assessment.</p> <p>Policy QD1 G) states that tall buildings are to be delivered through masterplan process. More detail is required on what this entails and how it is capture in the planning application process.</p> <p>We note in the recent Secretary of State (SoS) direction on the London Plan, changes have been made in relation to higher density buildings (Policy D3). Notably, SoS states that design of development must optimise capacity and where there are existing clusters of high-density buildings, expansion of the clusters should be positively considered by Boroughs. This should be incorporated into the policy text.</p>		comprehensive development), which provides further details to support policy implementation.
GHL (Leegate) Limited (Frank Knight obo)	2	QD 01	<p><i>Relates to Part 3, LEA SA 03</i></p> <p>Part 2 – Development Management Policies</p> <p>1. High Quality Design</p> <p>The Council continues to promote the delivery of high-quality design in Lewisham through a design-led approach (Policy QD1, Delivering high quality design in Lewisham), stating that buildings and spaces must be welcoming, inclusive, safe and accessible to all, and that proposals should facilitate good physical and mental health. GHL supports the premise of Policy QD1 which reflects the Mayor’s vision for ‘<i>Good Growth</i>’ set out in the London Plan 2021.</p>	Support noted.	No change.
Artworks Creekside (Avison Young obo)	2	QD 01	<p><i>Relates to Part 3, LNA SA 16</i></p> <p><i>Draft Policy QD1 – Delivering high quality design in Lewisham</i></p> <p>The draft policy advocates a design-led approach to development which ensures that the review of design options at an early stage of the development process are informed by an understanding of the local context. Our pre-application discussions with Council Officers to date have been undertaken on an iterative process and which has sought to understand the local context first, before then building a re-development strategy that responds to the specific characteristics found within Creekside.</p>	Noted.	Local Plan amended to emphasise local distinctiveness and site context within the design-led approach.
Fifth State and (Avison Young obo)	2	QD 01	<p><i>Relates to Part 3, LNA SA 16</i></p> <p><i>Draft Policy QD1 – Delivering high quality design in Lewisham</i></p> <p>Whilst the Owners and Developer of 5-9 Creekside support, in principle, the draft policy which advocates a design-led approach to development, it is considered that in order to reflect London Plan Policy D3 (optimising site capacity through the design-led approach), <u>further text should be added which positively promotes optimising the capacity of sites, including site allocations, providing policy support for higher density developments in well connected locations</u>. In our view, the proposed amends would ensure the policy is consistent with national and strategic policy and would subsequently enable the delivery of sustainable development in accordance with the NPPF and London Plan.</p>	Noted. The draft Local Plan already includes policies which seek to make the best use of land and optimise the capacity of sites. However, it is acknowledged this could be included in the Policy OL1 to set a clear direction linked to the spatial strategy.	Policy OL1 amended to make a specific reference to making the optimal use of land.
Transport for London	2	QD 01	<p>QD1 Delivering High Quality Design in Lewisham</p> <p>TfL CD appreciate that local character is an important consideration in the design of new development schemes. However, it is considered that as currently written</p>	Noted. Policies have been included within the Local Plan where they provide	Local Plan reviewed and amended to reduce repetition and make

Commercial Development			<p>the policy could discourage innovation or change, which is not in line with paragraph 127 of the National Planning Policy Framework 2019 (NPPF) which states that:</p> <p><i>“planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)”</i></p> <p>It is recommended that this policy is amended to reflect the sentiment of the above NPPF paragraph. It is also considered that criterion B and C are repetitive, and that B, C and D could be joined to make the policy more succinct.</p>	<p>useful local interpretation, to aid the implementation of the London Plan policies. It is acknowledged that there is some repetition of London Plan policies in parts of the plan however this is similar to approach taken by other London boroughs in their plans.</p>	<p>more concise, thereby shortening the length of the Local Plan.</p>
SGN (Quod obo)	2	QD 01	<p><i>Relates to Part 3, LSA SA 01</i></p> <p>Chapter 5 - High Quality Design</p> <p>5.4 SGN support the overarching design objective of ensuring that all new developments must follow a design-led approach in delivering high quality buildings in Lewisham. This is consistent with London Plan Policy D3. SGN recognise and support Lewisham’s aspirations at draft Policy QD1 ‘Delivery high quality design in Lewisham’ in ensuring that all new developments should respond positively to local distinctiveness; should put people at the centre of the design-led approach; should secure a coherent and well-function relationship with all land uses and spaces within the site and its surroundings and deliver high quality developments.</p>	<p>Support noted.</p>	<p>No change.</p>
Phoenix Community Housing (BPTW obo)	2	QD 01	<p>High Quality Design</p> <p>We support the shift to using a design-led approach to determining the most appropriate form of development and site capacity, set out in policies QD1 and QD6, and we will be commenting separately on the Small Sites Design Guide SPD which will be useful guidance filling the void left by the rescinding of the London Plan density matrix. It is agreed that the capacity of infrastructure should be an influencing factor on site capacity, with regard to individual and cumulative impacts of development. However, it should be noted that incremental development has a vital role to play in supporting the vitality of existing and viability of additional public and active transport infrastructure in more peripheral areas. This should be a positive factor on site capacity subject to appropriate measures being incorporated to maximise their uptake – for instance restricted vehicular parking and high quality, accessible and inclusive cycle parking.</p>	<p>Noted. The Local Plan broadly seeks to support the sensitive intensification of established residential and commercial areas. This is set out in Policy OL1 as part of the spatial strategy. Furthermore, draft Local Plan Policy housing policies give effect to this approach, for example, through promotion of small housing sites. The draft policies provide that new development should enable and encourage movement by walking, cycling and the use of public transport, and that new development must be appropriately supported by infrastructure.</p> <p>The preparation of the Small Sites SPD is outside the scope of the Local Plan.</p>	<p>No change.</p>
QUOD (Landsec obo - Lewisham	2	QD 01	9 Chapter 5 High Quality Design	Support is noted.	No change.
	2	QD 02			

Shopping Centre)	2	QD 03	<p>9.1 Chapter 5 contains key policies on high quality design aiming to ensure that growth is character-led; promoting inclusive and liveable neighbourhoods; and making best use of land.</p> <p>Design Principles</p> <p>9.2 Landsec support the overarching design objective of ensuring that all new developments must follow a design-led approach in delivering high quality buildings in Lewisham. Landsec recognise and support Lewisham’s aspirations at draft Policy QD1 ‘Delivery high quality design in Lewisham’ in ensuring that all new developments should respond positively to local distinctiveness; should put people at the centre of the design-led approach; should secure a coherent and well-function relationship with all land uses and spaces within the site and its surroundings and deliver high quality developments.</p> <p>9.3 The design principles relating to inclusive and safe design (draft Policy QD2) and public realm and connecting places (draft Policy QD3) are also welcomed.</p>		
Lendlease (Lichfields obo)	2	QD 02	<p><i>Relates to Part 3, LNA SA 02</i></p> <p>High Quality Design</p> <p>Lendlease is supportive of Lewisham’s ambitions to ensure new development follows a design-led approach, and that both design and the public realm are accessible, inclusive and high-quality.</p> <p><i>Policy QD2 – Inclusive and Safe Design</i></p> <p>As noted above, much of this policy unnecessarily replicates existing 2021 London Plan policy and should be made more concise.</p> <p>Part E refers to the provision of communal private amenity space and facilities, noting that <i>‘this should be made available for access by all residents occupying the development, regardless of tenure.’</i> Lendlease note that in large developments management issues can often make this policy unfeasible, for example where rooftop space is provided as communal space.</p> <p>Although some communal spaces, such as play space, should be accessible to all, this policy would be better worded along the lines of ‘all residents should have access to the same quality and standard of communal space across a development, regardless of tenure.’</p>	<p>Noted. Disagree with suggested policy wording as this is considered contrary to London Plan and the Government’s National Design Guide on tenure neutral housing. However it is acknowledged that the policy could be amended to provide more clarification around the need for appropriate management of any such private communal amenity space.</p>	<p>Local Plan Policy QD2 amended to include criterion on appropriate management of private and communal amenity space, along with a reference to Government’s National Design Guide and tenure neutral housing.</p>
Barratt London and the Church Commissioners (Avison Young obo)	2	QD 02	<p><i>Relates to Part 3, LCA SA 20</i></p> <p>Chapter 5 High Quality Design</p> <p>Draft Policy QD2 Inclusive and safe design</p> <p>Barratt London and the Church Commissioners support the principles of this Draft Policy to contribute to delivering inclusive, accessible, safe and secure environments in Lewisham.</p> <p>Part B(b) and Part E refer to access to all buildings and spaces being made available to all residents occupying the development, with Part B(b) requiring buildings and spaces to be designed to be inclusive to all and ‘not unnecessarily restrict or prevent access and use, including by occupants of different tenure types’ (our underlining). The current wording of these parts of the Draft Policy could give rise to significant security and management issues at the occupation stage. Part B(e) is clear that development proposals must have regard to ‘Secured by Design’ principles and supporting para 5.14 states proposals will be expected</p>	<p>Noted.</p>	<p>Local Plan Policy QD2 amended to include criterion on appropriate management of private and communal amenity space, along with a reference to Government’s National Design Guide and tenure neutral housing.</p>

			<p>to demonstrate that they have engaged with the latest standing guidance on ‘Secure by Design’, and we highlight that Part B(b) and Part E in their current form conflict with this. In particular, the Secured by Design Homes Guide (2019) which sets out the current standards is clear at Para 27.29 that ‘developments of over 25 flats, apartments, bedsits or bedrooms can suffer adversely from anti-social behaviour due to unrestricted access to all areas and floors of the building. SBD therefore seeks to prevent unlawful free movement throughout the building through the use of an access control system’. The Guide sets out that an acceptable approach is that each resident be assigned access to their floor only from lift/stairwells via an encrypted electronic key/fob, and access to stairwells from communal lobbies be restricted to residents only to reduce the risk of anti-social behaviour or criminal activities. The current wording of Part B(b) and Part E clearly conflicts with the Secured by Design Homes Guide (2019), and therefore also conflicts Part B(e) and supporting para 5.14 of Draft Policy QD2.</p> <p>In addition, large developments which contain many blocks or uses are often owned and/or managed by different parties who may have individual security and management requirements. Of note, affordable housing provision is most often managed separately to the wider housing offer by a Registered Provider (RP), and RPs will likely wish to ensure their residents are not subject to service charges of areas which they rarely use.</p> <p>We, therefore, request the Draft Policy is amended to be clear that ‘appropriate restriction of access for management and/or security reasons would be acceptable’ within new development schemes.</p>		
SGN (Quod obo)	2 3	QD 02	<p><i>Relates to Part 3, LSA SA 01</i></p> <p>5.5 The design principles relating to inclusive and safe design (draft Policy QD2) are also welcomed.</p>	Support noted.	No change.
Phoenix Community Housing (BPTW obo)	2	QD 02	<p>Accessible and inclusive housing is a cornerstone of PCH’s operations, and accordingly the requirement for 10% M4(3) and remainder M4(2) provision in line with the London Plan is wholly supported. However we welcome the flexibility on this built into the supporting text, for instance discretionary lift provision on constrained infill sites. We would suggest the inclusion of further flexibility, for example for schemes that overprovide on affordable housing, or that enables Housing Associations to meet the accessibility requirements across a wider portfolio, given that some sites more easily lend themselves to wheelchair housing.</p>	Noted. Draft Local Plan Policy QD2 Paragraph 5.16 already provides flexibility and that individual site circumstances will be taken into account.	No change.
Lendlease (Lichfields obo)	2	QD 03	<p><i>Relates to Part 3, LNA SA 02</i></p> <p><i>Policy QD3 Public realm and connecting places</i></p> <p>Lendlease is supportive of Lewisham’s ambitions for high-quality, design-led public realm. However, much of this policy replicates existing policies, such as London Plan 2021 Policy D8 (Public Realm). This policy should avoid unnecessary repetition and be made more concise.</p> <p>Part G of this policy sets out a number of specific requirements that provision should be made for in the public realm. It is unclear how these will be applied to individual schemes, as many of these requirements seem feasible only for a larger-scale public realm provision. More clarity on how this policy will be applied to individual schemes would be welcomed.</p>	Noted. Part G includes a list of indicative measures that could be incorporated into the public realm. The policy will be amended to reflect that measures should be considered on a case-by-case basis.	Local Plan policy QD3 Part G amended to provide clarity for implementation, making clear that the public realm measures should respond to the uses involved along with the location, nature and scale of development.
Cockpit Arts (The Planning Lab obo)	2	QD 03	<p><i>Relates to Part 3, LNA SA 14</i></p> <ul style="list-style-type: none"> Cockpit Arts (CA) is an international leader in craft and design. We are particularly supportive of specific policy that promotes high standards for 	Support noted.	No change.

			<p>new/enhancement of existing public realm, which emphasises inclusivity, safe streets, connectivity, legibility, and permeability.</p> <ul style="list-style-type: none"> We are also supportive of the drive to promote sustainability in design and construction of public realm. 		
SGN (Quod obo)	2	QD 03	<p><i>Relates to Part 3, LSA SA 01</i></p> <p>5.5 The design principles relating public realm and connecting places (draft Policy QD3) are also welcomed.</p>	Support noted.	No change.
Fifth State and (Avison Young obo)	2	QD 04	<p><i>Relates to Part 3, LNA SA 16</i></p> <p>Draft Policy QD4 – Building heights</p> <p>Figure 5.1 identifies locations which are suitable for tall buildings. The Owners and Developer of 5-9 Creekside welcome and support the identification of Creekside as a location which is suitable for the development of tall buildings. This reflects its position within the Deptford Creek / Greenwich Riverside Opportunity Area.</p> <p>Part C of the draft policy refers to criteria QD4.B(e) – QD4.B(f) however there is no criterion B(f) and <u>so further clarification is required to ensure Part C aligns with the relevant sections of Part B.</u></p> <p>We consider that Part D of the policy which defines what a tall building is in specific localities aligns with London Plan Policy D9 Part A and is supported.</p>	Noted. In response to public consultation feedback on the Regulation 18 plan, it is necessary to update Policy QD4 to ensure conformity with the London Plan, and also taking into account the Tall Buildings Study Addendum (2022).	Policy QD4 amended throughout to ensure conformity with the London Plan, with revisions also informed by the Tall Buildings Study Addendum (2022).
Fifth State and (Avison Young obo)	2	QD 04	<p><i>Relates to Part 3, LNA SA 16</i></p> <p>Part F of the draft policy lists assessment criteria for tall buildings, with F(c) referring to heights being sensitive to the site’s immediate and wider context. We consider that <u>this criterion should also refer to the emerging immediate and wider context, given that most areas identified for tall buildings are also subject to emerging site allocations for development and therefore the context will change as these allocations are realised.</u> This will ensure the most efficient use of land in these locations, such as Deptford Creekside.</p>	Noted. Agreed that the emerging local context should also be taken into account.	Draft Local Plan QD1 amended to provide clarification that development proposals should have regard to existing and emerging context, recognising that the character of sites and areas may evolve over time in accordance with the spatial strategy. Policy QD4 includes a cross-reference to QD1, which ensures this will be a consideration determining appropriate building heights.
Lendlease (Lichfields obo)	2	QD 04	<p><i>Relates to Part 3, LNA SA 02</i></p> <p>Policy QD4 Building heights</p> <p>Figures 5.1 and 5.2 show the suitability and sensitivity of sites in Lewisham for tall building development. We consider the shading and legend for these plans to be unclear, which makes the policy difficult to interpret. It would be simpler and more accessible to designate areas where tall buildings are appropriate, and clearly display these on a plan.</p>	Noted.	Local Plan amended to make clear the locations that are suitable for tall buildings, with clear boundaries. This will be reflected in Map 5.1 and set out in the associated Policies Map.
Barratt London and the Church Commissioners	2 2	QD 04 Figure 5.1	<p><i>Relates to Part 3, LCA SA 20</i></p> <p>Draft Policy QD4 Building heights</p> <p>Barratt London and the Church Commissioners are strongly supportive of the Plassy Island site, and the wider Catford Town Centre, being identified within Figure 5.1 as a location considered acceptable for tall buildings.</p>	Support noted. Agree that the emerging local context should also be taken into account.	Draft Local Plan QD1 amended to provide clarification that development proposals should have regard to

(Avison Young obo)			Part F of Draft Policy QD4 lists assessment criteria for tall building proposals, with F(c) referring to heights being sensitive to the site’s immediate and wider context. We consider this criterion should also refer to the ‘emerging immediate and wider context’ given that most areas identified for tall buildings are also subject to emerging allocations for development and therefore the context will change as these allocations are realised. This will ensure that the best and most efficient use of land is secured in these locations, including within Catford Town Centre and on the Plassy Island site. This will also ensure Draft Policy QD4 aligns with Draft Policy LCA3 Part D which states ‘development proposals should respond positively to the evolving urban scale and character of the town centre and its immediate surrounds’.		existing and emerging context, recognising that the character of sites and areas may evolve over time in accordance with the spatial strategy. Policy QD4 includes a cross-reference to QD1, which ensures this will be a consideration determining appropriate building heights.
Tetra Tech Planning (John Lyon’s Charity obo)	2 2 2	QD 04 Figure 5.1 Figure 5.2	The Charity considers that Part D(b) (Tall Buildings) of Policy QD4 Building Heights requires greater clarity within the policy in defining “significantly taller” buildings, noting the definition within London Plan Policy D9 Tall buildings (Part A), which states that they “should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey”. Figure 5.1 presents a “suitability plan” for tall buildings. The use of the coloured fading on the key is very difficult to read, however it appears that most areas within the South Strategic Regeneration Area are considered to be “less suitable” for tall buildings including those six site allocations within Bell Green/Lower Sydenham where there is the potential for a higher growth strategy (and potential ‘Opportunity Area’ designation). In addition, on review of the Draft Tall Buildings Study (2021) we note that the Bell Green/Lower Sydenham area is generally categorised as “less sensitive”, which is confirmed in Figure 5.2 (Tall Buildings sensitivity plan), therefore we would question the “less suitable” designation of the area.	Noted. In response to public consultation feedback on the Regulation 18 plan, it is considered necessary to update Policy QD4 to ensure conformity with the London Plan, and also taking into account the Tall Buildings Study Addendum (2022).	Policy QD4 amended throughout to ensure conformity with the London Plan, with revisions also informed by the Tall Buildings Study Addendum (2022).
GHL (Leegate) Limited (Frank Knight obo)	2 2	QD 04 Figure 5.1	<p><i>Relates to Part 3, LEA SA 03</i></p> <p>Policy QD4 (Building heights) and Figure 5.1 (Tall buildings suitability plan) sets out areas where tall buildings are considered acceptable in-principle, in accordance with London Plan Policy D9 (Tall buildings). Policy QD4 notes that tall buildings must be delivered through a masterplan process in order to ensure that they are appropriately located both within a site and wider locality, designed to a high standard and effectively managed.</p> <p>GHL broadly supports Policy QD4 and Figure 5.1, which identifies Leegate Shopping Centre as an area that is suitable for tall buildings. This is also supported within the Draft Tall Building’s Survey (March 2021), an evidence document, where the site is identified as accommodating building heights of up to 16 storeys.</p> <p>Notwithstanding this, GHL is keen to understand how the application of this policy will determine appropriate building heights. It is recognised that tall buildings should be delivered to a high-quality design, but it is not a reasonable requirement that all tall building proposals need to undergo an extensive masterplan process exercise. Whist GHL agrees that tall buildings require detailed design scrutiny, as set by the London Plan policy requirements (London Plan Supporting Paragraph 3.9.4), the requirement for a masterplan process is onerous and not fully justified or effective.</p>	Noted. The draft Local Plan policy makes a distinction between masterplans required by the local authority and other requirements for proposals that hit the threshold to be referred to the Mayor of London. Given their scale and impact, it is considered appropriate to require tall buildings to be informed and delivered through the masterplan process.	Policy QD4 amended to provide further clarification around requirements for masterplan, with cross-reference to Policy DM4 (Comprehensive development and master planning). Tall building policy has been amended.
LaSalle Investment	2 2	QD 04	<p><i>Relates to Part 3, LSA SA 10</i></p> <p>Part Two: Managing Development</p> <p><i>QD4 Building Heights</i></p>	Following the Regulation 18 consultation, the site	No change.

Management (Savills obo)		Figure 5.1	<p>Policy QD4 states that ‘tall buildings’ will only be considered acceptable in-principle in the locations identified at Figure 5.1 as being appropriate for tall buildings.</p> <p>Whilst LSIM acknowledge the requirement to adopt a strategy for the delivery of tall buildings within the Borough the policy as currently drafted is considered to be overly restrictive and greater flexibility should be introduced to ensure the delivery of residential units can be optimised. This is particularly relevant for sites which are proposed to be allocated for residential-led mixed use development so as not to stifle innovative design.</p> <p>The appropriateness of the final level of density can only be judged on a site by site basis. This will need to take into consideration a range of matters linked to accessibility, quality of accommodation and place, amenity and social infrastructure.</p> <p>The strategic designation for the Homebase site on Bromley Road is for growth and intensification. In order to increase the development capacity on brownfield land and to ensure development viability at strategic sites, the policy should not look to unduly restrict building heights. The restriction on tall buildings without a proper consideration of design and assessment key views within the growth and intensification areas would undermine the opportunity to increase development capacity, which in turn affects the regeneration opportunity.</p> <p>LSIM request that Policy QD4 is revised to take account of those sites outside of the locations identified at Figure 5.1 and confirm support for redevelopment of these for higher densities where the criteria outlined at part F of the policy are demonstrated.</p> <p>This will ensure that the policy is sufficiently flexible to ensure that the strategic objectives and allocations to secure the Council’s development needs are deliverable.</p>	<p>capacities and mix of uses have been re-visited. This has taken into account the complexities of the Homebase/Argos, Bromley Road site – including that it is an out-of-centre retail site, the reduced demand for retail post-Covid, the need to protect the setting of the pond and to respond to the surrounding character and heritage assets. Based on these considerations, the land use mix and residential units have remained the same.</p> <p>However, agree that the appropriateness of the final level of density can only be judged on a site by site basis. Optimal capacities for sites will be established at planning application stage through a design led approach.</p> <p>Following the Regulation 18 public consultation, additional work has been undertaken on the Lewisham Tall Buildings Study which will inform amendments to the Part 2 Policy QD4 Building Heights and the suitability for tall buildings at the Homebase site.</p>	
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	2	QD 04	<p><i>Relates to Part 3, LNA SA 14</i></p> <p>Tall Buildings</p> <p>With regard to tall buildings in the Borough, our Client considers that greater flexibility should be afforded to the location of tall buildings, specifically within site allocations. While our Client is supportive of the Policy QD4 (Buildings heights) in that tall buildings should respond positively to the distinctive character of Lewisham’s neighbourhoods, London Plan Policy D9 (Tall buildings) states that tall buildings have a key role in facilitating regeneration opportunities and future growth.</p>	<p>Noted. Not all of the Local Plan site allocations will be suitable for tall buildings and therefore the proposed words could be misleading.</p> <p>In response to public consultation feedback on the Regulation 18 plan, it is considered necessary to</p>	No change.

			<p>Therefore, it is considered that in order to effectively deliver regeneration through provision of new homes and employment/commercial floorspace within site allocations and be consistent within the regeneration objectives of tall buildings within the London Plan and particularly brownfield sites such as Sun Wharf, Policy QD4 should afford greater flexibility to tall buildings within site allocations. As such, we request the following text be added to Policy QD4 (the additions are shown underlined):</p> <p><u><i>Proposals for new tall buildings within site allocations should be supported, provided that they meet the criteria of part B of this policy.</i></u></p> <p>Making these changes would ensure that the draft Local Plan is consistent with national policy and effective in its delivery.</p>	<p>update Policy QD4 to ensure conformity with the London Plan, and also taking into account the Tall Buildings Study Addendum (2022). This will make clear areas that are considered suitable for tall buildings.</p>	
Cockpit Arts (The Planning Lab obo)	2	QD 04	<p><i>Relates to Part 3, LNA SA 14</i></p> <ul style="list-style-type: none"> CA is in agreement with the areas identified as suitable for tall buildings in the Tall Buildings Suitability Plan. We endorse the stipulation for a masterplan process requirement for new tall buildings. See also our response to Site Allocation 14 (Sun Wharf), below. 	<p>Support noted. In response to public consultation feedback on the Regulation 18 plan, it is considered necessary to update Policy QD4 to ensure conformity with the London Plan, and also taking into account the Tall Buildings Study Addendum (2022). This will make clear areas that are considered suitable for tall buildings.</p>	<p>Policy QD4 amended throughout to ensure conformity with the London Plan, with revisions also informed by the Tall Buildings Study Addendum (2022).</p>
Artworks Creekside (Avison Young obo)	2	QD 04	<p><i>Relates to Part 3, LNA SA 16</i></p> <p>Draft Policy QD4 – Building heights</p> <p>We note that the sites fall within locations which are suitable for tall buildings which is supported by Artworks Creekside. Given the changing context of Creekside, it is imperative that any reference to the “site’s context” within the Policy includes site allocations, locations of change and extant permissions within the vicinity of the site – as noted in para. 5.35 of the post-amble.</p> <p>We note that there is an inconsistency in the drafting in Part C of the Policy.</p>	<p>Noted. In response to public consultation feedback on the Regulation 18 plan, it is considered necessary to update Policy QD4 to ensure conformity with the London Plan, and also taking into account the Tall Buildings Study Addendum (2022).</p>	<p>Draft Local Plan QD1 amended to provide clarification that development proposals should have regard to existing and emerging context, recognising that the character of sites and areas may evolve over time in accordance with the spatial strategy. Policy QD4 includes a cross-reference to QD1, which ensures this will be a consideration determining appropriate building heights.</p>
Selkent Holdings (Daniel Watney LLP)	2	QD 04	<p><i>Relates to Part 3, LWA SA 09</i></p> <p>Draft Policy QD4 - Building Heights</p> <p>Draft Policy QD4 relates to tall buildings, including where they should be located within the Borough and the criteria that they must satisfy to be considered acceptable. The principle of including this policy within the Plan is supported in the context of the new London Plan Policy D9 requiring Local Plans to allocate suitable areas for the location of tall buildings.</p>	<p>Noted. In response to public consultation feedback on the Regulation 18 plan, it is considered necessary to update Policy QD4 to ensure conformity with the London Plan, and also taking into account the</p>	<p>Policy QD4 amended throughout to ensure conformity with the London Plan, with revisions also informed by the Tall Buildings Study Addendum (2022). However Willow Way</p>

		<p>Draft Policy QD4 states that tall buildings will only be considered acceptable in-principle in the locations identified in Figure 5.1. The figure, which is reproduced below, considers only those locations as being appropriate for tall buildings.</p> <p>The same draft policy defines tall buildings as “<i>buildings that cause a significant change to the skyline and which:</i></p> <p><i>a. Are 30 metres or more in height, except in the Thames Policy Area where they are buildings 25 metres or more in height; or</i></p> <p><i>b. Are significantly taller than the prevailing height of buildings in the immediate and surrounding area.</i></p> <p>As discussed latterly in this representation, Willow Way LSIS is earmarked for substantial redevelopment in the form of employment-led mixed-use development. However, when read alongside draft Policy QD4, there would not be support for any development which is significantly taller than the prevailing height of buildings in the immediate or surrounding area.</p> <p>The policy needs to align with the wider aspirations for strategic growth within the draft plan and not provide a potential barrier to development being brought forward on allocated sites.</p> <p><i>LB Lewisham officer note: an extract of Figure 5.1 is included in the original representation. It shows that Willow Way LSIS falls outside of the tall building zone.</i></p> <p>The emerging context is mixed as outlined at the outset of this letter however, when reading Part D(b) of Policy QD4 as currently drafted, any proposal for redevelopment on the Willow Way site would be unable to be ‘significantly taller’ than the prevailing height of buildings in the surrounding area.</p> <p>The supporting text at Paragraph 5.29 states that “<i>taller buildings are those that project above the prevailing heights of buildings and structures within a site’s immediate and surrounding area (normally, but not exclusively, to 2 to 3 storeys above</i>”.</p> <p>Whilst there is <i>some</i> flexibility for tall buildings on Willow Way offered through the wording listed above, we would contend that this does not go far enough to achieve the development objectives set through the site allocation discussed below.</p> <p>Given that Willow Way is identified as a site for redevelopment, and is of a scale that can genuinely deliver meaningful regeneration and substantial public benefit in terms of employment uses, residential accommodation, affordable housing and public realm, there needs to be sufficient flexibility with regards to building heights.</p> <p>There will be significant pressure on sites being brought forward within Willow Way due to the requirement to be employment-led mixed use development and provide necessary affordable housing and public realm. By restricting building heights to circa 6-7 storeys through the currently drafted Policy QD4, would risk any development across the area not being viable.</p>	<p>Tall Buildings Study Addendum (2022). This includes the designation of specific areas suitable for tall buildings. The Study does not support the designation of Willow Way LSIS as suitable for tall buildings.</p> <p>Should a development proposal for a tall building come forward at this site, this would be assessed against the relevant development plan policies, and any departure from these considered on the basis of material considerations in line with the Planning and Compulsory Purchase Act Section 28(6).</p>	<p>LSIS continues to be identified as a location that is not suitable for tall buildings.</p>
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The Renewal Group (Carney Sweeney obo)	2 2	QD 04 Table 5.1	<p><i>Relates to Part 3, LNA SA 08</i></p> <p>Policy QD4 Building Heights</p> <p>Firstly, this policy needs to have regard to the final changes to the new London Plan 2021 in relation to the definition of tall buildings and the final wording of policies relating to them.</p> <p>We note that part C of the policy refers to criteria QD4.B(e) - QD4.B(f) whereas in fact there is no (f). The policy needs to be amended in this regard.</p> <p>In relation to part B of the policy we consider that there is no basis for buildings to be of “<i>exceptional</i>” design and architectural quality. It is acknowledged that they should be of “<i>high quality</i>” design but the higher bar of “<i>exceptional</i>” is too high in this context. Also, we consider that the wording of B(e) should be altered to refer to “<i>unacceptable adverse impacts on the amenity of neighbouring properties</i>” (our emphasis) rather than just “<i>adverse impacts.....</i>”. Guidance documents in relation to such matters always refer to the need to take a flexible approach and the current wording does not facilitate this.</p> <p>Again, in relation to part C of this policy, flexibility should be incorporated to respond to emerging areas of infrastructure improvements over the whole plan period, which may not be anticipated at present. Appropriate wording should be incorporated in this regard.</p> <p>Having regard to some of the comments above, changes should also be made to the various criteria in part F of the policy.</p>	<p>Noted. In response to public consultation feedback on the Regulation 18 plan, it is considered necessary to update Policy QD4 to ensure conformity with the London Plan, and also taking into account the Tall Buildings Study Addendum (2022). This includes updates to the definition of tall buildings.</p> <p>The Council considers that the requirement for exceptional design quality is appropriate given the impact tall and taller buildings can potentially have.</p>	<p>Policy QD4 amended throughout to ensure conformity with the London Plan, with revisions also informed by the Tall Buildings Study Addendum (2022).</p> <p>Policy QD7 (Amenity) and Policy QD4 (Building heights) amended to refer to ‘unacceptable adverse impact’ as suggested.</p>
The Renewal Group (Carney Sweeney obo)	2 2	QD 04 Table 5.1	<p>Figure 5.1 comprises a Tall Buildings suitability plan. This plan does not take account of areas where the PTAL is planned to be increased over the plan period. For example, a new station on the Overground at Surrey Canal Road is planned imminently which will significantly improve the PTAL in this area. This is a highly</p>	<p>Noted. The Tall Buildings Study (2019) considered improvements in PTAL to</p>	<p>Policy QD4 amended throughout to ensure conformity with the London Plan, with</p>

			relevant consideration for planned growth and the suitability of tall buildings in this area. Figure 5.1 needs to be amended accordingly.	inform the tall buildings suitability areas. In response to public consultation feedback on the Regulation 18 plan, it is considered necessary to update Policy QD4 to ensure conformity with the London Plan, and also taking into account the Tall Buildings Study Addendum (2022).	revisions also informed by the Tall Buildings Study Addendum (2022).
SGN (Quod obo)	2 2	QD 04 Figure 5.1	<p><i>Relates to Part 3, LSA SA 01 Tall Buildings</i></p> <p>5.7 Policy QD4 (E) states that tall building will only be considered acceptable in principle in locations identified in Figure 5.1, which excludes the gas work site but contains the adjacent Site Allocations 2 (Bell Green Retail Park) and 3 (Sainsbury's Bell Green). If land adjacent to the site is identified as appropriate for tall buildings, then this designation should be extended to the west to include the gas works site to ensure a comprehensive redevelopment of the area can be achieved.</p> <p>5.8 Point C) outlines that where the prevailing height of buildings adjoining the site, as well as its immediate and surrounding area is expected to evolve in accordance with the spatial strategy for the Borough, proposals for taller building may be considered. In view of the strategic ambition for Bell Green and Lower Sydenham to become an Opportunity Area, and identification of the adjacent site allocations as appropriate for tall buildings in accordance with the emerging spatial strategy, there is clear justification for the gas work site allocation to be afforded similar tall building status.</p> <p>5.9 Point D) defines tall buildings as being 30 meters or more in height. The main policy text of draft Policy QD4 B & D, and Paragraph 5.29 should be amended so that it is consistent with London Plan Policy D9 'Tall Buildings' which now also defines tall buildings as those that are over 6-storeys or 18 metres in height. The reason for this late change to the new London Plan was to ensure that the tall building policy does not undermine the incremental densification of areas, which is considered to be an appropriate way to meet housing need.</p> <p>5.10 The following text to paragraph 5.29 should also be removed: Taller buildings are those that project above the prevailing heights of buildings and structures within a site's immediate and surrounding area (normally, but not exclusively, 2 to 3 storeys above).</p>	<p>Noted. In response to public consultation feedback on the Regulation 18 plan, it is considered necessary to update Policy QD4 to ensure conformity with the London Plan, and also taking into account the Tall Buildings Study Addendum (2022).</p> <p>The Council disagrees that the policy proposals around 'taller' buildings should be removed. It is considered appropriate that policies are in place to manage building heights for developments which are not defined as tall.</p>	Policy QD4 amended throughout to ensure conformity with the London Plan, with revisions also informed by the Tall Buildings Study Addendum (2022).
SGN (Quod obo)	2	QD 04	5.11 Finally, point G states that <i>"Tall buildings must be delivered through a masterplan process in order to ensure that they are appropriately located both within a site and wider locality, designed to a high quality standard and effectively managed"</i> .	Noted. Given their scale and impact, it is considered appropriate to require tall buildings to be informed and delivered through the masterplan process.	Policy QD4 amended to provide further clarification around requirements for masterplan, with cross-reference to Policy DM4 (Comprehensive

			5.12 Again, we raise concern as to the soundness of this policy in absence of any Masterplan for Bell Green and Lower Sydenham, which as prescribed in draft Policy QD4 will guide future development.		development and master planning).
QUOD (Landsec obo - Lewisham Shopping Centre)	2	QD 04	<p>Building Heights</p> <p>9.4 Landsec support Reg 18 Plan Figure 5.1 which identifies the site as a location appropriate for tall buildings and specifically its unrestrictive nature in determining what heights (in storeys) would be acceptable.</p> <p>9.5 The Council published a draft tall buildings study (February 2021) as part of its evidence base to the Reg 18 plan which provides a methodology for determining the appropriate scale and location of tall buildings within Lewisham. This is based on site suitability and sensitivity. The site undoubtedly meets all the criteria, as follows:</p> <ul style="list-style-type: none">High PTAL – PTAL 6;Proximity to Bakerloo Line Extension – Adjacent to transport cluster;Town Centre location – Located in a major town centre and potential for Metropolitan town centre classification;Opportunity area location – Located in an Opportunity area;Growth area location – Located in a Growth area;Characterised by building height and tall building clusters – Located in an existing tall building cluster;Proximity to Green and Open Space – Close to Green/Open Space;Good Cycling Transport Accessibility Level – Benefits from a reasonable level of accessibility to railway and London Underground stations by cycling;Site allocation – It is an allocated site;Outside a World Heritage Sites and Buffer Zone – Located outside World Heritage Site and Buffer Zone;Outside a Conservation Area – Located outside a Conservation Area;Outside an Area of Special Local Character – Located outside an Area of Special Local Character;Listed Buildings – Does not contain any listed buildings;LVMF viewing corridor and consultation areas – Outside the LVMF viewing corridor and consultation areas;Local landmarks and local view buffers – Outside the local landmarks, local views and local view buffer;Varied Surrounding Building Heights – Lewisham has one of the widest spectrums of building heights; andLower ground (topography) – The site is located on areas of lower ground therefore is less sensitive to the impacts of tall building proposals. <p>9.6 Given the above, we believe that there should be no limit to building heights at this location.</p> <p>9.7 At draft Policy QD4 F (c) ‘Building Heights’, proposals for tall buildings will be required to demonstrate that the development is designed with building heights that are sensitive to the sites immediate and wider context having regard to figure 5.2 (sensitivity map). Although this map is a result of the layered sensitivity analysis carried out in respect to the draft tall buildings study, this map is unclear and confusing. It would assist if the legend is amended accordingly.</p>	Following the Regulation 18 public consultation, additional work has been undertaken on the Lewisham Tall Buildings Study which aligns with the London Plan. The Study will inform amendments to Policy QD4 Building Heights and relevant site allocations.	Local Plan amended to take account of the Tall Buildings Study as well as provide supporting text on tall buildings delivered through clusters of tall buildings.

			<p>9.8 We request that the main policy text of draft Policy QD4 B & D is amended so that it is consistent with London Plan Policy D9 ‘Tall Buildings’ which now also defines tall buildings as those that are over 6 storeys or 18 metres in height. The reason for this late change to the new London Plan was to ensure that the tall building policy does not undermine the incremental densification of areas, which is considered to be an appropriate way to meet housing need.</p> <p>The following text to paragraph 5.29 should also be removed:</p> <p>Taller buildings are those that project above the prevailing heights of buildings and structures within a site’s immediate and surrounding area (normally, but not exclusively, 2 to 3 storeys above).</p>		
Tribe Student Housing (Avison Young obo)	2	QD 06	<p><i>Relates to Part 3, LNA SA 06</i></p> <p>We also consider that the draft site allocation has underestimated the development potential of the site as a whole. A key objective (GG2) of the Publication London Plan is ensuring that development makes the best use of land by enabling the development of brownfield land, particularly in Opportunity Areas and proactively exploring the potential to intensify the use of land to support additional homes and workspaces including promoting higher density development. This is also consistent with the approach in the LBL draft Local Plan Policy QD6 which seeks a design-led approach to optimise site capacity.</p> <p>Therefore, on the basis that the Site comprises brownfield land in an identified Opportunity Area, high density development should be promoted in line with regional and local policy objectives. An increase in capacity (by following a design-led approach) beyond 189 units would also assist the Council in meeting their housing targets. The site allocation includes a parcel of land to the north of the Trundley’s Road site, known as land at Juno Way. The current applications for the site are for the Trundley’s Road site only. The residential application which is for 189 units, demonstrates that additional quantum could be achieved across both parcels of land.</p>	<p>Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. The capacities have been amended to reflect the planning consents granted for the site as well as the current pre-application.</p> <p>Optimal capacity for the site will be established at planning application stage through a design led approach.</p>	Surrey Canal Road and Trundleys Road LSIS site allocation amended by increasing residential units to 274 and increasing employment floorspace to 2,890m².
Trundley’s Road Ltd (Avison Young obo)	2	QD 06	<p><i>Relates to Part 3, LNA SA 06</i></p> <p>We also consider that the draft site allocation has underestimated the development potential of the site as a whole. A key objective (GG2) of the Publication London Plan is ensuring that development makes the best use of land by enabling the development of brownfield land, particularly in Opportunity Areas and proactively exploring the potential to intensify the use of land to support additional homes and workspaces including promoting higher density development. This is also consistent with the approach in the LBL draft Local Plan Policy QD6 which seeks a design-led approach to optimise site capacity.</p> <p>Therefore, on the basis that the Site comprises brownfield land in an identified Opportunity Area, high density development should be promoted in line with regional and local policy objectives. An increase in capacity (by following a design-led approach) beyond 189 units would also assist the Council in meeting their housing targets. The site allocation includes a parcel of land to the north of the Trundley’s Road site, known as land at Juno Way. The current applications for the site are for the Trundley’s Road site only. The residential application which is for 189 units, demonstrates that additional quantum could be achieved across both parcels of land.</p>	<p>Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. The capacities have been amended to reflect the planning consents granted for the site as well as the current pre-application. Optimal capacity for the site will be established at planning application stage through a design led approach.</p>	Surrey Canal Road and Trundleys Road LSIS site allocation amended by increasing residential units to 274 and increasing employment floorspace to 2,890m².

Fifth State and (Avison Young obo)	2	QD 06	<p><i>Relates to Part 3, LNA SA 16</i></p> <p>Draft Policy QD6 – Optimising site capacity</p> <p>The Owners and Developer of 5-9 Creekside support draft Policy QD6 which requires a design-led approach to be taken to optimise site capacity and establish an appropriate development density. This is considered to broadly align with London Plan Policy D3, however further advocacy of delivering higher density developments in appropriate locations should also be incorporated into this policy. Paragraph 5.46 of the draft Local Plan states that the policy seeks to ensure that <i>‘the limited supply of land is used effectively and efficiently [...] in order to meet the Borough’s future needs and to support the delivery of the spatial strategy, it will be necessary to facilitate higher density development in appropriate locations’</i>. As such, <u>support for higher density development should be explicitly expressed within the policy wording itself</u>.</p> <p><u>In addition, it would be helpful if draft Policy QD6 could explain that the indicative development capacity figures proposed as part of all the draft Site Allocations are not intended to be a cap on development quantum, rather a broad indication of capacity. The policy wording should therefore state that the overall quantum will therefore be established through a design led approach to development to make most efficient use of land (in line with NPPF paragraph 122).</u></p>	<p>Noted. The Local Plan approach to establishing the optimal capacity of the site is considered to be in general conformity with the London Plan. It is not considered appropriate to explicitly state supporting higher densities in the policy, as higher density development may not always result in the most optimal use of land.</p> <p>The Plan clearly states that for the site allocations, “The site capacities are indicative only and should not be read prescriptively for the purpose of planning applications, where the optimal capacity of a site must be established on a case-by-case basis using the design-led approach, and having regard to relevant planning policies”.</p>	No change.
Notting Hill Genesis (Savills obo)	2	QD 06	<p><i>Relates to Call for site</i></p> <p>A mixed use redevelopment of the site could be achieved through making the best use of site and NHG therefore supports the principle of draft Local Plan Policy QD6 (Optimising Site Capacity) which sets out that development proposals must demonstrate that the design-led approach has been used to optimise a site’s capacity, in accordance with the London Plan Policy D3.</p>	Support noted.	No change.
Barratt London and the Church Commissioners (Avison Young obo)	2	QD 06	<p><i>Relates to Part 3, LCA SA 20</i></p> <p>Draft Policy QD6 Optimising site capacity</p> <p>Barratt London and the Church Commissioners are strongly supportive of a design-led approach to optimise site capacity and to establish an appropriate development density and consider this aligns with London Plan Policy D3.</p>	Support noted.	No change.
GHL (Leegate) Limited (Frank Knight obo)	2	QD 06	<p><i>Relates to Part 3, LEA SA 03</i></p> <p>GHL strongly welcomes the Council’s approach to site optimisation through a design-led approach (Policy QD6, Optimising site capacity), which reflects the Government’s objective of <i>“significantly boosting the supply of homes”</i> (Paragraph 59 of the NPPF).</p>	Support noted.	No change.
Bellway Homes Ltd and Peabody Developments	2	QD 06	<p><i>Relates to Part 3, LNA SA 14</i></p> <p>With regard to Policy QD6 (Optimising site capacity) of the draft Local Plan, our Client is supportive of a design-led approach to optimising a site’s capacity. However, we would suggest that when considering comprehensive redevelopment proposals within site allocations, more flexibility should be</p>	Noted. Draft Local Plan policy QD6.B identifies the criteria used to determine optimal capacity of a site, which are considered to be	No change.

Ltd (Savills obo)			<p>afforded with regard to density. As such, we request the following text is added to Policy QD6 (the additions are shown underlined): <i><u>A flexible approach to density guidance should be taken when considering comprehensive redevelopment proposals within site allocations, with the optimum density of a development resulting from a design-led approach.</u></i></p> <p>Making this change would provide flexibility and it will ensure that the draft Local is effective in its delivery.</p>	<p>in conformity with the London Plan. The Local Plan is not prescribing densities and therefore the approach is considered to be sufficiently flexible.</p> <p>Paragraph 13.9 of the draft Local Plan clearly states that for the site allocations that, “The site capacities are indicative only and should not be read prescriptively for the purpose of planning applications, where the optimal capacity of a site must be established on a case-by-case basis using the design-led approach, and having regard to relevant planning policies.”</p>	
Artworks Creekside (Avison Young obo)	2	QD 06	<p><i>Relates to Part 3, LNA SA 16</i> Draft Policy QD6 – Optimising site capacity As noted above, Policy QD6 must include explicitly emerging contexts as part of the appraisal process in ensuring a design-led approach to be taken to optimise site capacity and establish an appropriate development density. The post-amble of the Policy talks of undertaking a series of appraisal for establishing the optimum site capacity and our pre-application engagement with the Council to date has been through this iterative process.</p>	<p>Agree that the emerging local context should be taken into account in the design led approach.</p>	<p>Draft Local Plan policy QD1 and supporting text amended to provide clarification that development proposals should have regard to existing and emerging context, recognising that the character of sites and areas may evolve over time in accordance with the spatial strategy.</p>
Selkent Holdings (Daniel Watney LLP)	2	QD 06	<p><i>Relates to Part 3, LWA SA 09</i> Policy QD6 – Optimising Site Capacity We welcome Policy QD6 relating to optimising site capacity particularly through demonstration that the design-led approach has been used to optimise such capacity. We feel this should influence the development parameters of individual site allocations and draft policies to understand their true potential which is why we request latterly in this representation that the capacities identified in the site allocation are made clear that they should be informed by more detailed assessments of capacity.</p>	<p>Noted. Paragraph 13.9 of the draft Local Plan clearly states for the site allocations that, “The site capacities are indicative only and should not be read prescriptively for the purpose of planning applications, where the optimal capacity of a site must be established on a case-by-case basis using the design-led approach, and having regard to relevant planning policies.”</p>	<p>No change.</p>
Transport for London	2	QD 06	<p>QD6 Optimising Site Capacity</p>	<p>Support noted.</p>	<p>No change.</p>

Commercial Development			TfL CD are supportive of Policy QD6 criterion Ac which requires development to consider “ <i>Public Transport Accessibility Levels, taking into account current levels and future levels expected to be achieved by the delivery of planned public transport infrastructure</i> ”.		
SGN (Quod obo)	2	QD 06	<i>Relates to Part 3, LSA SA 01</i> 5.6 SGN welcomes the design-led approach that Lewisham have taken in respect to optimising site capacity (draft policy QD6 ‘Optimising Site Capacity’) which includes the appraisal of design options as per the London Plan.	Support noted.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	QD 06	Optimising Site Capacity 9.9 Landsec welcomes the design-led approach that Lewisham have taken in respect to optimising site capacity (draft policy QD6 ‘Optimising Site Capacity’) which includes the appraisal of design options as per the London Plan.	Support noted.	No change.
GHL (Leegate) Limited (Frank Knight obo)	2	QD 07	<i>Relates to Part 3, LEA SA 03</i> Policy QD7 (Amenity and Agent of Change) states development proposals must demonstrate how they will protect and, wherever possible, enhance the amenity of existing and future occupiers, as well as the amenity of neighbouring properties. Part B sets out that development proposals will be required to positively address amenity through a design-led approach in order to achieve the following: a) Make appropriate provision of privacy both for users of the development and those in neighbouring properties, ensuring development does not result in unreasonable levels of overlooking; b) Ensure adequate provision for and seek to optimise outlook for users of the development; c) Ensure adequate levels of ventilation, daylight, sunlight and open aspects including provision of private amenity space where appropriate; and d) Minimise and appropriately mitigate disturbances associated with the construction and operation of the development including noise, vibration, odour, fumes, dust, artificial light and site waste. Whilst GHL acknowledges the importance of safeguarding residential amenity, it must be recognised that development may result in some impact on the amenity of neighbouring properties, particularly in urban contexts; not least within areas where higher density development is actively encouraged. As such, Policy QD7 should consider whether impacts of proposed development on amenity are acceptable within the physical and planning context of a site, and accounting for the wider benefits of the development and other policies contained within the Lewisham Local Plan Review. We therefore consider that part B of Policy QD7 should be reviewed.	Noted.	Local Plan policy on Amenity and Agent of Change amended to reflect that development should not have an unreasonable adverse impact on amenity.
SEGRO (CBRE Limited obo)	2	QD 07	<i>Relates to Part 3, LNA SA 04</i> 4. Agents of Change SEGRO are encouraged by the Council’s inclusion of Policy QD7 (Amenity and Agent of Change) as this will ensure development proposals do not compromise the operational capacity of existing impact generating uses, including industrial. We recommend that this policy explicitly references ensuring the 24/7 operation of SILs is not threatened by new development, and also recommend that this requirement is cross referenced within the site allocations for mixed use development surrounding SILs – for example Surrey Canal Road and Trundleys Road, Timber Yard, Evelyn Court and Neptune Wharf, which are all located in	Noted. It is agreed that the Local Plan should include additional Borough-wide policies around protection of SIL/LSIS in respect of amenity it is not necessary to include specifics for every site allocation. The Local Plan must be read as a whole.	Local Plan Part 2 Economy and Culture policies amended to include additional requirements on amenity specifically in relation to protecting the function and effectiveness of SIL and LSIS, and SIL on a 24-hour basis. This will work

			proximity to Deptford Trading Estate. The design requirements for residential elements of these development should require specific measures to be included such as high-performance acoustic glazing, mechanical ventilation and amenity spaces positioned well away from the SIL. These site allocations should also include a requirement for legal agreements, conditions and even noise easements that uphold the agents of change principles and protect existing uses from any potential conflicts created by incoming residents.		together with Amenity and Agent of Change policy.
Cockpit Arts (The Planning Lab obo)	2	QD 07	<i>Relates to Part 3, LNA SA 14</i> <ul style="list-style-type: none"> We query whether this policy sufficiently considers/protects the amenity of <i>future neighbouring</i> occupiers/uses where elements of a masterplan are being brought forward at different times by different owners/developers. Strengthening this policy in this regard will ensure that the development of parts of larger sites is not unduly stymied and ensure that the potential of development sites can be maximised in line with policy. 	Noted. The Draft Local Plan policy QD07 supporting text provides that proposals will be expected to take account of existing and proposed future uses, for example, by considering land use principles established by planning consents or site allocation policies.	To aid policy implementation, Policy QD07 supported text amended to refer to consideration given to unimplemented planning consents and site masterplans.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	QD 07	Amenity Considerations	Support noted.	No change.
	2	QD 08	9.10 Landsec are supportive of draft policies QD7 ‘Amenity and Agent of Change’;		
	2	QD 09	QD8 ‘Noise and Vibration’ and QD9 ‘External Lighting’ (including the corresponding policy narrative) which are not tightly restricted by specific standards, rather they include flexibility that allows the optimisation of housing delivery whilst ensuring that good quality amenity is addressed.		
The Renewal Group (Carney Sweeney obo)	2	QD 08	<i>Relates to Part 3, LNA SA 08</i> Policy QD8 Noise and Vibration In relation to part B of this policy, instead of stating that “ <i>new noise and vibration generating development must be appropriately located away from noise sensitive uses and suitably demonstrate that measures will be implemented to mitigate any adverse impacts</i> ”, we consider that the policy should read “ <i>New noise and vibration generating development should be appropriately located away from noise sensitive uses and/or suitable demonstrate that measures will be implemented to mitigate any adverse impacts</i> ” (<i>our emphasis</i>). There are many roads, rail lines and other noise generating developments/activities across the borough and such a change to the policy will ensure that these do not unnecessarily preclude development.	Noted. Agree that policy should be amended to continue to protect amenity whilst ensuring this does not unnecessarily preclude development from coming forward.	Local Plan Amenity and Agent of Change policy amended to better align with wording in London Plan. As well, policy amended to make clear noise sensitive development sited away from existing noise generating uses or activities, and if not possible providing suitable separation and acoustic design measures.
L&Q Group	2	QD 11	<i>Relates to Call for site</i> <i>Infill and backland sites, back gardens and amenity spaces</i> Draft LBL Policy QD11 on infill and back land sites, back gardens and amenity spaces is restrictive and could impact on the number of applications on small sites, particularly in relation to the blanket retention of trees. Sites should be assessed on a case by case basis, to assess the appropriateness of trees to be retained.	Noted. The draft policy QD11 is considered sufficiently flexible to allow development to come forward. To aid implementation, the policy requirement for tree retention on back gardens and amenity spaces cross-references the other Local Plan policy on Urban	No change.

				greening and trees - this encourages that trees are retained but it does not require all trees to be retained.	
GHL (Leegate) Limited (Frank Knight obo)	2	QD 11	<p><i>Relates to Part 3, LEA SA 03</i></p> <p>Policy QD11 (Infill and backland sites, back gardens and amenity areas) sets out the approach proposed to development on infill and backland sites. The Council will support this type of development, where the proposed use is appropriate to the Site and compatible with land uses in the site’s immediate vicinity; and the development has a clear urban design rationale. GHL supports this policy in principle, especially in relation to their development aspirations along Carston Close. This policy aligns with the national and regional approach of optimising the use of previously developed land.</p>	Support noted.	No change.
Fifth State and (Avison Young obo)	2	HE 01	<p><i>Relates to Part 3, LNA SA 16</i></p> <p><i>Draft Policy HE1 – Lewisham’s historic environment</i></p> <p>The Owners and Developer of 5-9 Creekside support the thrust of draft Policy HE1 which seeks to preserve or enhance Lewisham’s historic environment. Part B of the policy provides a simplified version of the assessment of potential impacts from the key heritage tests outlined in NPPF paragraphs 193 to 197, which will be the relevant tests against which planning decisions will be made should the proposed development lead to either substantial or less than substantial harm. The policy therefore aligns with the national and strategic framework and we have no further comment to make at this time.</p>	Support noted.	No change.
Fifth State and (Avison Young obo)	2	HE 02	<p><i>Relates to Part 3, LNA SA 16</i></p> <p><i>Draft Policy HE2 – Designated heritage assets</i></p> <p>We recognise that Conservation Areas are subject to statutory protection under Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990, which states that ‘<i>special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area</i>’. The 1990 Act and NPPF paragraphs 200-201 also recognise that new development can benefit the character and appearance of a conservation area through enhancements.</p> <p>Part E of draft Policy HE2 states that ‘<i>the demolition of buildings or structures that make a positive contribution to the character or appearance of a conservation area will be resisted</i>’. Fifth State do not agree with the wording of this criterion as drafted as it fails to accurately reflect how the impact of development proposals on a conservation area should be assessed.</p> <p>The impact of development proposals on a conservation area must take into account the development proposals as a whole, i.e. the impact of demolition as well as the impact of the replacement proposals (as established through Dorothy Bohm v SSCLG (2017)). Even in cases where the building or feature proposed to be demolished is identified as making a positive contribution to the area, it is also necessary to consider the effect of the replacement proposals, as if the contribution made by the replacement is equivalent or better than existing, this would result in no harm or a heritage benefit. As such it is suggested that Part E of the policy is rephrased to better reflect the relevant heritage tests, as set out below:</p> <p><u><i>‘Buildings or structures that have been identified to make a positive contribution to the character or appearance of the conservation area should be retained</i></u></p>	Disagree. There is no requirement to repeat guidance from the NPPF. The proposed wording relates specifically to the NPPF test for non-designated heritage assets and does not address the test for designated assets, i.e. Conservation Areas. The Local Plan provides a positive framework for preserving the historic environment and the policy seeks to avoid the demolition of buildings that have been identified to make a positive contribution to Conservation Areas.	No change.

			<i>wherever possible, and where buildings and structures are proposed to be demolished the impacts of the demolition should be balanced against the impacts of the replacement proposals.'</i>		
Artworks Creekside (Avison Young obo)	2	HE 02	<p><i>Relates to Part 3, LNA SA 16</i></p> <p>Draft Policy HE2 – Designated heritage assets</p> <p>Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990, which states that <i>‘special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that (conservation) area’</i>. The 1990 Act and NPPF paragraphs 200-201 also recognise that new development can benefit the character and appearance of a conservation area through enhancements. Given that 2 and 3 Creekside fall within a Conservation Area, it is imperative that draft Policy HE2 is compliant with the NPPF.</p> <p>Part C of draft Policy HE2 states that <i>‘Proposals involving the retention, refurbishment and reinstatement of features that are important to the significance of a Conservation Area will be supported’</i>. Clearly, not all features can be retained within a redevelopment proposal within a Conservation Area. The post-amble differentiates between ‘original or other features’. The complexities of redevelopment schemes will require the Council to apply this Policy criteria with flexibility based upon the objectively understood importance of any such features.</p> <p>Part E of draft Policy HE2 states that <i>‘the demolition of buildings or structures that make a positive contribution to the character or appearance of a conservation area will be resisted’</i>. Artworks Creekside do not agree with the wording of this criterion as drafted as it fails to accurately reflect how the impact of development proposals on a conservation area should be assessed.</p> <p>Given the Dorothy Bohm v SSCLG (2017)) judgement, it is also necessary to consider the effect of the replacement proposals, as if the contribution made by the replacement is equivalent or better than existing, this would result in no harm or a heritage benefit.</p>	Comments relating to Part C are noted. There is no requirement to repeat guidance from the NPPF. The Local Plan provides a positive framework for preserving the historic environment and the policy seeks to avoid the demolition of buildings that have been identified to make a positive contribution to Conservation Areas.	No change.
Fifth State and (Avison Young obo)	2	HE 03	<p><i>Relates to Part 3, LNA SA 16</i></p> <p>Draft Policy HE3 – Non-designated heritage assets</p> <p>The Owners and Developer of 5-9 Creekside note that the wording of draft Policy HE3 Part A which identifies that <i>‘development proposals will be supported where they preserve or enhance the significance of a locally listed building or other non-designated heritage asset, and the asset’s setting’</i> goes beyond the NPPF Paragraph 197 test which states that <i>‘the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset’</i>. As outlined in our comments above, it will be necessary for a balancing exercise to take place to assess the impact of the loss of a designated or non-designated heritage assets which must be considered against the replacement development proposal, as well any public benefits which arise from the development proposals.</p> <p><u>We consider that Part B of draft Policy HE3 should be redrafted to reflect Paragraph 197 of the NPPF, which requires a balanced judgement to be taken</u></p>	Noted. The Plan is in line with NPPF paragraph 190 which states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment. There is no need to replicate the tests in paragraph 197 of the NPPF as this will be taken into account when determining applications.	No change.

			(rather than specifically looking to preserve or enhance the significance of a non-designated heritage asset).		
Artworks Creekside (Avison Young obo)	2	HE 03	<p><i>Relates to Part 3, LNA SA 16</i></p> <p>Draft Policy HE3 – Non-designated heritage assets</p> <p>Artworks Creekside note that the assessment criteria contained within draft Policy HE3 goes beyond the test of para. 197 of the NPPF which notes that ‘<i>The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset</i>’.</p> <p>Instead, the draft Policy HE3 is requiring an assessment which goes above and beyond the requirements of the NPPF.</p>	Noted. The Plan is in line with NPPF paragraph 190 which states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment. There is no need to replicate the tests in paragraph 197 of the NPPF as this will be taken into account when determining applications.	No change.
Phoenix Community Housing (BPTW obo)	2	HE 03	<p>Heritage</p> <p>In our previous representations we objected to the inclusion of a policy that identifies and protects Areas of Special Local Character, considering that Conservation Area designations provide a comprehensive level of policy protection for sites which meet the necessary criteria and which are considered appropriate for designation. A new level of protection for sites not considered suitable for Conservation Area designation could inhibit the ability for development, particularly in areas where the majority of potential sites are on previously developed or infill sites. This concern is exacerbated by the higher housing requirement figures dictated by the New London Plan and so we strongly re-iterate that this and any policy which could discourage development on previously developed land should be avoided. The policy requirements set out under ‘High Quality Design’ should be sufficient to ensure proposals suitably integrate with the surrounding context and character. Many of the proposed ASLCs are in South Lewisham, where such designations would detract from the area’s potential for ‘sensitive intensification’, thus reducing the effectiveness of the spatial strategy for this part of the borough.</p>	Areas of Special Local Character already exist within the adopted Local Plan and are covered in the draft plan in policy HE3 (D) and paragraph 6.33. Paragraph 39 of the Planning Practice Guidance Historic Environment allows local authorities to identify non-designated heritage assets which can be buildings, monuments, sites, places, areas or landscapes which have a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets. Areas of Special Local Character fall within this category and sensitive intensification will not be prohibited by their identification.	No change.
L&Q Group	2	Section 7	<p><i>Relates to Call for site</i></p> <p>4.3 Housing</p> <p><i>Meeting Lewisham’s housing needs</i></p> <p>L&Q supports LBL’s commitment to meet and exceed the London Plan target of 1,667 net completions a year over the next 10 years. We also support LBL priority for genuinely affordable housing through directing development to those areas identified in the spatial strategy in the Borough, including the allocations of strategic sites.</p>	Support noted.	No change.

Tribe Student Housing (Avison Young obo)	2 2	HO 01 HO 08	<p><i>Relates to Part 3, LNA SA 06</i></p> <p>Policy HO1 sets out that Lewisham is required to meet the draft London Plan housing targets of at least 16,670 net housing completions between 2020-2030 (or 1,667 net completions per year).</p> <p>Moreover, draft Policy HO8 sets out that PBSA can contribute towards LBL achieving its housing targets where 2.5 PBSA bedspaces is equivalent to 1 conventional residential unit. This is consistent with the approach in the draft London Plan. We support this approach on the basis that PBSA is providing a type of accommodation for which there is a growing need. The provision of PBSA also helps free-up the conventional housing stock, further assisting the borough in meeting its housing target.</p>	Support noted.	No change.
Trundley's Road Ltd (Avison Young obo)	2 2	HO 01 HO 08	<p><i>Relates to Part 3, LNA SA 06</i></p> <p>Policy HO1 sets out that Lewisham is required to meet the draft London Plan housing targets of at least 16,670 net housing completions between 2020-2030 (or 1,667 net completions per year).</p> <p>Moreover, draft Policy HO8 sets out that PBSA can contribute towards LBL achieving its housing targets where 2.5 PBSA bedspaces is equivalent to 1 conventional residential unit. This is consistent with the approach in the draft London Plan. We support this approach on the basis that PBSA is providing a type of accommodation for which there is a growing need. The provision of PBSA also helps free-up the conventional housing stock, further assisting the borough in meeting its housing target.</p>	Support noted.	No change.
L&Q Group	2	HO 01	<p><i>Relates to Call for site</i></p> <p>In respect to the Part C (b) Policy HO1 sets out proposals on allocated sites must comply with site allocation requirements and will be resisted where they do not. Whilst welcomed, we consider the Part C (b), and any other policies governing site allocations, should clearly recognise the capacities are indicative and that proposals may exceed these indicative capacities whilst still broadly complying with site allocations. i.e. capacities should not be taken as upper development limits. A failure to do so could limit housing, particularly affordable housing, being delivered on the site and be out of step with the Council's overall aspiration to optimise sites capacity (Policy QD6).</p>	<p>Noted. The policy requirement is considered necessary to ensure the delivery of the spatial strategy.</p> <p>Part 3 of the draft Local Plan makes clear that with respect to the site allocations, the site capacities are indicative only and should not be read prescriptively for the purpose of planning applications, where the optimal capacity of a site must be established on a case-by-case basis using the design-led approach, and having regard to relevant planning policies.</p>	No change.
L&Q Group	2	HO 01	<p><i>Relates to Call for site</i></p> <p>L&Q welcomes the flexibility being applied to studio flats (Policy HO1 E), recognising their suitability as part of larger schemes, in highly accessible areas, where a wider mix of units (including family housing), can be offered.</p>	Support noted.	No change.
(Avison Young obo)	2	HO 01	<p><i>Relates to Part 3, LCA SA 25</i></p> <p>Policy and Site Allocation Review</p>	Despite an increase in the London Plan housing	Local Plan amended to appropriately refer to

			<p><i>Policy HO1: Meeting Lewisham’s Housing Needs</i></p> <p>The emerging Plan should be prepared in accordance with the policies detailed within the NPPF (Paragraph 35). As such, policies relating to housing growth and the identified of housing need should be underpinned by the standard methodology as detailed in Paragraph 60, unless a justified alternative approach is agreed. The calculation is confirmed in the national planning guidance.</p> <p>Notwithstanding this, the strategic framework (London Plan, 2021) sets out the housing targets for the London Borough’s over the next 10 years. The London Plan was prepared during the transitional arrangements associated with the introduction of the standard methodology and is therefore based on the London Strategic Housing Market Assessment underpinning the Plan. The policy wording associated with the emerging local context should be updated to reflect the adopted London Plan’s targets: 1,667 per year.</p> <p>We note that the Council’s housing trajectory detailed in the latest Authority Monitoring Report (January 2021) is applied against the previous London Plan’s (2016) housing targets (1,385) and therefore does not meet their latest strategic target.</p> <p>Indeed, the Council recognise at Paragraph 2.7.10 of the AMR (2021) that: <i>“The Council will need to work with developers and its partners to find an additional supply of longer term sites to bridge the gap between the supply that is currently anticipated and the adopted London Plan target. This will become ever more important as the annual housing target for Lewisham is set to increase significantly to 1,667 per annum, once the Draft London Plan is adopted.”</i></p> <p>The proposed development site therefore presents an important opportunity to assist in the Council’s housing delivery against Lewisham’s identified strategic housing need, as set out in the remainder of these representations (see Identification of Sites for Co-Location section).</p>	<p>target, the Regulation 19 Local Plan identifies specific deliverable and developable sites with capacity to meet the Borough’s strategic housing target over the plan period. The council can demonstrate a five year housing land supply and has included a Housing Trajectory within the Plan.</p>	<p>the London Plan (2021), its borough-level housing target for Lewisham and period with which this takes effect. In addition, the plan has been amended to remove references to the Local Housing Need (LHN) figure and the standard methodology. Local Plan amended to include an up-to-date Housing Trajectory and five year housing land supply.</p>
Yorkshire & Clydesdale Bank Trustees Ltd c/o CBRE Global Investors (Montagu-Evans obo)	2	HO 01	<p><i>Relates to Call for site</i></p> <p>Policy HO1 Meeting Lewisham’s Housing Needs</p> <p>Draft Policy HO1 sets out the Council’s strategic housing target, under which the Council outlines two housing targets. The first is the now adopted London Plan (2021) minimum target of 16,670 net housing completions between 2020 and 2030, which is equivalent to 1,667 per year. The second is the Local Housing Need (LHN) figure calculated in the 2019 Lewisham Strategic Housing Market Assessment (SHMA) (2019), which establishes a minimum annual need of 2,334 net units per annum. We also note that the revised standard methodology was published by the Government on 16 December 2020, which identifies an annual need of 4,178 dwellings.</p> <p>We would recommend the Council refers to a single strategic housing target, so that the Plan is unambiguous. This should also be expressed for the total Plan period. This is important for monitoring the Council’s performance in housing delivery once the Plan is adopted and to ensure the target is achieved.</p> <p>The supportive text to Draft Policy HO1 states that: <i>“We have identified specific large sites which have the potential capacity to deliver approximately 25,000 net new homes. When combined with trend-based</i></p>	<p>Despite an increase in the London Plan housing target, the Regulation 19 Local Plan identifies specific deliverable and developable sites with capacity to meet the Borough’s strategic housing target over the plan period. The council can demonstrate a five year housing land supply and has included a Housing Trajectory within the Plan.</p>	<p>Local Plan amended to appropriately refer to the London Plan (2021), its borough-level housing target for Lewisham and period with which this takes effect. In addition, the plan has been amended to remove references to the Local Housing Need (LHN) figure and the standard methodology. Local Plan amended to include an up-to-date Housing Trajectory and five year housing land supply.</p>

			<p><i>windfall delivery rates in the Borough, there is sufficient capacity to meet and exceed the draft London Plan housing target over a 15-year period; however the phasing of development will be an important consideration. Meeting the NPPF Local Housing Need figure poses a significant challenge, given Lewisham’s unique circumstances, particularly the need for strategic transport infrastructure to unlock development potential in areas, and to optimise the capacity of sites”.</i></p> <p>The above makes clear that the Council has not identified sufficient land to meet the minimum housing target that has now been imposed through the adoption of the London Plan across the Plan period. We note that for a Plan to be found sound it must be positively prepared, which means a Plan should seek to meet the area’s objectively assessed needs. This has not been achieved by the Regulation 18 Plan. We remind the Council that the NPPF (Paragraph 123) makes clear that where there is an anticipated shortage of land for meeting identified housing needs such as in this case, policy-makers must:</p> <p><i>“Ensure that developments make optimal use of the potential of each site. In these circumstances... plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible”.</i></p> <p>In order for the Plan to contribute to achieving sustainable development, and for the Council to meet its substantial minimum housing targets, it is incumbent on LBL to properly assess and make allocations for appropriate redevelopment sites through the Local Plan. This should be reflected in an acknowledgement that the Council must focus on allocating additional land for residential development, including on designated employment land given it represents the largest stock of brownfield land to meet the forecast unmet need. The Council must re-consider its policy approach to address this and we comment on specific employment policies below.</p>		
Notting Hill Genesis (Savills obo)	2	HO 01	<p><i>Relates to Call for site Residential</i></p> <p>New homes is a key priority for the Mayor of London. As such, Table 4.1 of the London Plan sets out a minimum 10 year housing target for Lewisham of 16,670 new homes over a 10 year period (2019/20 to 2028/29) which equates to 1,667 per annum. We note this is reflected in Policy HO1 of the draft Local Plan, and sets out that the Council will ensure that the London Plan minimum ten-year housing target is met and exceeded. Whilst NHG strongly supports the delivery of new homes in Lewisham, we note that the Standard Methodology Housing Need (published 16 December 2020 by MHCLG) outlines a considerably higher local housing need in Lewisham of 4,178 new homes per annum. It goes to follow that there is a significant opportunity for a mixed use redevelopment at the site which could contribute to these ambitious housing targets.</p> <p>NHG also strongly support the delivery of new affordable homes within Lewisham. NHG acknowledges the Council’s threshold approach to viability in accordance with the London Plan Policy H5 and the principle of increased affordable housing, and for new homes to be genuinely affordable, subject to viability. Again, it goes to follow that there is a significant opportunity for a mixed use redevelopment at the site to deliver new affordable homes which could contribute to Lewisham’s affordable homes target.</p>	Despite an increase in the London Plan housing target, the Regulation 19 Local Plan identifies specific deliverable and developable sites with capacity to meet the Borough’s strategic housing target over the plan period. The council can demonstrate a five year housing land supply and has included a Housing Trajectory within the Plan.	Local Plan amended to appropriately refer to the London Plan (2021), its borough-level housing target for Lewisham and period with which this takes effect. In addition, the plan has been amended to remove references to the Local Housing Need (LHN) figure and the standard methodology. Local Plan amended to include an up-to-date Housing Trajectory and five year housing land supply.

			We note that draft Local Plan Policy HO1 (Parts D and F) seek to provide a mix of unit sizes and housing choice with reference to the Council’s Housing Strategy or other strategies.		
Barratt London and the Church Commissioners (Avison Young obo)	2	HO 01	<p><i>Relates to Part 3, LCA SA 20</i></p> <p>Chapter 7 Housing</p> <p>Draft Policy HO1 Meeting Lewisham’s housing needs</p> <p>Barratt London and the Church Commissioners are strongly supportive of Part A of Draft Policy HO1 which requires development proposals to make the best use of land and optimise the capacity of housing sites in order to ensure the London Plan housing target is met and exceeded, and delivery against Lewisham’s Local Housing Need figure is maximised.</p> <p>Barratt London and the Church Commissioners are also supportive of Part D of this policy which requires development to deliver an appropriate mix of housing within the site and locality having regard to individual site circumstances (including location, character, and nature and scale of development proposed). We request the criteria listed under Part D for consideration of housing mix be expanded to acknowledge the following parts of London Plan Policy H10 Part A which state that applicants and decision-makers should have regard to:</p> <ul style="list-style-type: none"> the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity. the role of one and two bed units in freeing up existing family housing <p>We consider this will ensure an appropriate mix of housing can be secured, which contributes to the Borough’s housing target and need.</p>	Support noted. The Council has prepared an updated SHMA that has considered the need for family housing and smaller units. The results of the study have influenced the policies in the Local Plan.	<p>Local Plan amended with new target size mix for affordable housing.</p> <p>Local Plan amended to clarify locations where a higher proportion of 1 and 2 bed units may be appropriate, in accordance with the London Plan and as suggested.</p>
GHL (Leegate) Limited (Frank Knight obo)	2	HO 01	<p><i>Relates to Part 3, LEA SA 03</i></p> <p>2. Housing</p> <p>The Lewisham strategic housing target is set by the London Plan, which stipulates a ten-year target of 16,670 net housing completions over the period 2020 to 2030 (Policy HO1 Meeting Lewisham’s housing needs). Policy HO1 suggests that delivery against Lewisham’s Local Housing Need figure will be maximised.</p> <p>The Council explains that the LPA will increase housing supply by allocating strategic sites for new housing development and ensure that all development proposals make the best use of land and optimise the capacity of housing sites, in line with proposed Policy QD6 (Optimising site capacity).</p> <p>GHL strongly supports the housing delivery strategy and reminds the LPA that Lewisham’s centres, such as Lee Green District Centre, have a number of locations where a significant number of homes could be delivered. These homes would be in sustainable locations close to shops, services, amenities and public transport. The homes could be delivered across a range of unit sizes and include affordable housing. The Leegate Shopping Centre is being promoted by GHL to provide increased residential units, and GHL reminds the Council that the associated increase in residential units in the Lee Green District Centre would also enhance the centre’s long-term viability, which is a significant planning benefit.</p>	Support noted.	Local Plan amended to appropriately refer to the London Plan (2021), its borough-level housing target for Lewisham and period with which this takes effect. In addition, the plan has been revised remove references to the Local Housing Need (LHN) figure and standard methodology.
GHL (Leegate) Limited	2	HO 01	<p><i>Relates to Part 3, LEA SA 03</i></p> <p>Policy HO1 adds that a provision of a mix of unit sizes is required to meet local need, including the target unit size mix that is set out in the Council’s Housing</p>	Noted. The Council has prepared a SHMA Update (2022) that has considered	Local Plan policy HO1 amended to provide further clarification

(Frank Knight obo)			<p>Strategy. Furthermore, LBL requires the delivery of family housing units (3+ bedrooms) on schemes of 10 or more dwellings and LBL states that they will resist proposals where they comprise an overconcentration of 1 or 2 bedroom units. Policy HO1 does propose a number of instances where deviations from the preferred housing mix will be acceptable, such as areas benefitting from high PTAL, or sited in a locality that benefits from good provision of larger and family sized units; or the proposal is the only housing format deliverable owing to site constraint (studios proposed are of an exceptional design quality).</p> <p>GHL seeks further clarification as to what the Council would define as an ‘overconcentration’ of 1 or 2 bedroom units in Lewisham.</p> <p>GHL acknowledges the need for a mix of house types, sizes and tenures to meet identified needs. However, it is important that those policies of the Lewisham Local Plan Review provide sufficient flexibility and avoid stifling the delivery of new homes as the result of overly prescriptive and restrictive policies. Any such policy would not be deliverable over the plan period, and therefore not be effective. There should also be an allowance within the policies for diversification of residential mix to come forward, which can contribute significantly towards the Borough’s housing offer overall.</p> <p>GHL recognises the Council’s evidence, provided by the Strategic Housing Market Assessment. However, the interpretation of this evidence is resulting in an overly prescriptive policy which can potentially affect a schemes viability, especially in respect of private housing. GHL can confirm there is demand for a mix of housing typologies, generally for smaller units than larger units, and we encourage the Council to engage with the developers to understand this demand. In the interests of providing balanced communities, understanding market conditions, will help inform a more aspirational yet flexible policy approach.</p> <p>It is therefore very important that any policies relating to housing mix allow for the final mix to be agreed between the applicant and Council on a site-by-site basis. This would reflect paragraph 11 of the NPPF, which promotes a flexible approach to housing mix, recognising that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location.</p>	<p>the need for smaller units and identifies a target mix of unit sizes and informed the policy in the Regulation 18 document. It is acknowledged that further clarifications could be provided to make clear that housing mix will be considered on a case by case basis, and to provide further policies and guidance around the issue of overconcentration.</p>	<p>around how overconcentration will be assessed.</p> <p>Local Plan policy HO1 amended to make clear that appropriate housing mix will be considered on a case-by-case basis.</p>
LaSalle Investment Management (Savills obo)	2	HO 01	<p><i>Relates to Part 3, LSA SA 10</i></p> <p>HO1 Meeting Lewisham’s housing needs</p> <p>Policy HO1 identifies that “...<i>development proposals must make the best use of land and optimise the capacity of housing sites in order to ensure:</i></p> <p><i>a. draft London Plan minimum ten-year target of 16,670 net housing completions over the period 2020 to 2030 (or 1,667 net completions per year) is met and exceeded; and</i></p> <p><i>b. That delivery against Lewisham’s Local Housing Need figure is maximised”.</i></p> <p>LSIM support the intention to facilitate an increase in housing supply within Lewisham through the allocation of sites in order to help meet the strategic target for the Borough. It is noted that such targets are not a ceiling and are encouraged to be exceeded.</p>	<p>Support noted.</p>	<p>No change.</p>

			<p>Policy HO1 also states that the Council will keep under review the Local Plan strategic housing target to ensure conformity with the London Plan.</p> <p>LSIM welcomes the Council’s commitment to such a review and would advocate that the Local Plan should respond appropriately to take account of any evidence of unmet housing needs within the Borough.</p>		
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	2	HO 01	<p><i>Relates to Part 3, LNA SA 14</i></p> <p>Residential</p> <p>Our Client is fully supportive of Site Allocation 14 providing new homes (C3).</p> <p>We also note that new homes is a key priority for the Mayor of London. As such, Table 4.1 of the London Plan sets out a minimum 10 year housing target for Lewisham of 16,670 new homes over a 10 year period (2019/20 to 2028/29) which equates to 1,667 per annum. We note this is reflected in Policy HO1 of the draft Local Plan, and sets out that the Council will ensure that the London Plan minimum ten-year housing target is met and exceeded. Whilst our Client strongly support the delivery of new homes in Lewisham, we note that the Standard Methodology Housing Need (published 16 December 2020 by MHCLG) outlines a considerably higher local housing need in Lewisham of 4,178 new homes per annum. It goes to follow that there is a significant opportunity for a residential-led mixed use redevelopment at the site which could contribute to these ambitious housing targets.</p>	Noted.	Local Plan amended to appropriately refer to the London Plan (2021), its borough-level housing target for Lewisham and period with which this takes effect. In addition, the plan has been revised remove references to the Local Housing Need (LHN) figure and standard methodology.
Tavern Propco (Savills obo)	2	HO 01	<p><i>Relates to Part 3, LSA SA 11</i></p> <p>Housing Need and Delivery</p> <p>The adopted London Plan (January 2021) has a target of 52,000 homes per annum across London over the plans ten-year period.</p> <p>On 29 January 2021, the Secretary of State (The Rt Hon Robert Jenrick MP) issued the Mayor of London (Sadiq Khan) with a letter confirming that he is content for the London Plan to be formally published, but set out a strong message to the Mayor of London that housing supply across London needs to be improved. In his letter to the Mayor of London, the Secretary of State commented:</p> <p>“...you still have a very long way to go to meet London’s full housing need, something your plan clearly and starkly fails to achieve. Londoners deserve better and I will be seeking to work with those ambitious London Boroughs who want to deliver over and above the housing targets you have set them; something that would not have been possible without my earlier directions.”</p> <p>Given the above, it is clear that the London Plan is unambitious with its adopted housing targets and boroughs, including Lewisham, should be seeking to exceed the minimum targets of the London Plan to achieve the GLA’s identified need of 66,000 homes over the ten-year period. It is considered that this provides strong justification for amendments to the housing supply targets set out in emerging Policy HO.1 and discussed below.</p> <p>Emerging Policy HO1 ‘Meeting Lewisham’s Housing Needs’</p> <p>Emerging Policy HO1 states that development proposals must make the best use of land and optimise the capacity of housing sites in order to ensure that the draft London Plan minimum ten-year target of 16,670 net housing completions</p>	Noted. Since the Regulation 18 consultation closed, the London Plan 2021 has come into force. This established the Borough’s strategic housing requirement.	Local Plan amended to appropriately refer to the London Plan (2021), its borough-level housing target for Lewisham and period with which this takes effect. In addition, the plan has been revised remove references to the Local Housing Need (LHN) figure and standard methodology.

			<p>over the period 2020 to 2030 (or 1,667 net completions per year) is met and exceeded.</p> <p>The adopted London Plan’s yearly housing targets for Lewisham (1,667) are significantly below the Standard Methodology Housing Need figure of 4,178 per annum. This represents an uplift of 150.6% above the housing target in the London Plan.</p> <p>Requested Amendment: It is strongly considered that Lewisham should be working to achieve the housing need figures identified within the Standard Methodology and that emerging Policy HO1 should be amended with an increased housing target to reflect this. The Lewisham’s South Area Site Allocation 11: Downham Coop can help contribute to the increased supply of housing in Lewisham over the plan period by setting the number of residential units development of the site should deliver as a minimum of 42 units.</p>		
The Renewal Group (Carney Sweeney obo)	2	HO 01	<p><i>Relates to Part 3, LNA SA 08</i></p> <p>Policy HO1 Meeting Lewisham’s Housing Needs</p> <p>This policy needs to refer to Build to Rent housing and include support for it, in line with the London Plan. Build to Rent developments have a vital role to play in meeting London’s housing needs and should be actively supported in Lewisham.</p>	Agree.	Local Plan Policy HO1 amended to reference Build to Rent.
SGN (Quod obo)	2	HO 01	<p><i>Relates to Part 3, LSA SA 01</i></p> <p>Chapter 7 - Housing</p> <p>5.13 SGN supports the need to significantly increase housing delivery in Lewisham as set out in draft Policy HO1 ‘Meeting Lewisham’s housing needs’ and supports the requirement for Councils to work positively and proactively with key stakeholders and development industry partners. This aligns with NPPG guidance (Para. 59) that sets out the Government’s objective of significantly boosting the supply of homes.</p> <p>5.14 The inclusion of the London Plan minimum ten-year target of 16,670 net additional homes in draft Policy HO1 is supported. We would however also urge the Council to review its minimum housing requirement in light of the NPPF standard methodology for Local Housing Need. It is considered that the Standard Methodology housing need figure based on the adopted London Plan (2,964 net additional homes) should be included in the main policy text of draft Policy HO1. SGN propose an amendment to draft Policy HO1 A (a and b) as follows:</p> <p>5.15 “A The draft London Plan minimum ten-year housing delivery target of 16,670 net housing completions over the period 2020 to 2030 (or 1,667 net completions per year) is met and exceeded a starting point and delivery exceeding this level should be encouraged. This is in order to maximise housing delivery against the NPPF Standard Methodology target of 2,964 net homes per annum.</p>	Noted. The NPPG clearly states that the London Plan is responsible for establishing London-wide need and disaggregating this to individual Boroughs. Therefore, the current position for the borough is a minimum housing need figure of 1,667 based on the 2021 London Plan target.	Local Plan amended to appropriately refer to the London Plan (2021), its borough-level housing target for Lewisham and period with which this takes effect. In addition, the plan has been revised remove references to the Local Housing Need (LHN) figure and standard methodology.
SGN (Quod obo)	2	HO 01	5.16 Point C) of draft Policy HO1, outlines that in increasing housing supply new residential development will be directed to Opportunities Areas, that Lewisham will support new housing development on site allocations and will make the best use of land and optimise housing site capacities. SGN is fully supportive of Policy HO1 C) but again reinforce that the full optimisation of the gas works site cannot be realised in absence of allocation of the site as an appropriate location for tall buildings.	Noted.	Tall building policies and suitability zones changed
Phoenix Community	2	HO 01	<p>Housing</p> <p>PCH strongly support the Council’s aspirations of maximising the supply of additional homes in the Borough to meet and exceed the annual housing target set out in the New</p>	Noted. The Local Plan is seeking to boost the	No change.

Housing (BPTW obo)			London Plan. A concentration of these in Opportunity Areas defined by the London Plan is supported, however the proportion to be directed <i>to ‘strategic corridors...consistent with the spatial strategy for the borough’</i> (as per draft policy HO1) will need to be re-assessed following the Bakerloo line extension postponement. In the interim period, this plan should direct a greater proportion to sensitive intensification of residential areas, small sites, and estate renewal and regeneration. To that end, policy HO2 (Small Sites) should at least echo the London Plan’s target of 379 homes per year on small sites in Lewisham <i>as minimum</i> , and should consider upping this target given that it is premature to allocate strategic-scale sites on the future Bakerloo line.	delivery of small housing development beyond the historic delivery levels, aiming not only to meet the London Plan small sites target but to exceed it. The Borough’s small sites target is signposted in the policy supporting text.	
Phoenix Community Housing (BPTW obo)	2	HO 01	The New London Plan stipulates that boroughs should only set prescriptive dwelling size mix requirements (no. bedrooms) for low-cost rent homes, however the consultation document is not prescriptive on this, and this flexibility is welcomed by PCH.	Noted.	Local Plan amended to set a target size mix for affordable homes, informed by the SHMA Update.
Tetra Tech Planning (John Lyon’s Charity obo)	2	HO	Housing Do you agree that the Local Plan has identified all of the issues around housing? We note the absence of a specific policy considering “Build-to-Rent” schemes. The private rented sector is growing in the Borough and across London and it would not be prudent to dismiss this sector. In accordance with London Plan Policy H11, a stand-alone policy for this sector should be included.	Disagree that a new stand-alone policy on Build to rent is needed although there is merit in referring to this tenure within the Local Plan	Local Plan Policy HO1 amended to make reference to Build to rent.
Phoenix Community Housing (BPTW obo)	2	HO 01	Part E of policy HO1 restricts the subdivision of 3+ bedroom units into smaller units subject to a number of caveats. We would suggest the inclusion of ‘smart lettings’ into this list, as piloted by PCH at its Hazelhurst Court development and proposed in the Council’s draft Housing Allocations Policy, to reflect the role of new 1 and 2-bed housing in freeing up underused family housing on other sites within a management portfolio. There should be greater flexibility to enable some of these re-found family units to be subdivided into further affordable housing if meeting the other design criteria set out in the policy.	Noted. Following the Regulation 18 public consultation, additional work has been undertaken on the Lewisham SHMA. This makes clear the local need for family sized housing units. Given recent housing delivery records which suggest a significant number of 1-2 bed units coming forward, it is considered appropriate to guard against the loss of existing family sized housing units of 3+ beds.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	HO 01	Housing Mix 10.6 Landsec are concerned that draft Policy HO1 E does not go far enough to provide sufficient flexibility on housing mix for sites located in sustainable locations such as Town Centres. 10.7 Policy H10 ‘Housing Size and Mix’ of the London Plan provides greater clarity on where smaller unit developments might be supported (e.g. at Part 6 of the London Plan, it considers that one and two bed units are generally more appropriate in locations which are closer to a town centre) with the emphasis on the applicant to demonstrate acceptability.	Disagree. Following the Regulation 18 public consultation, additional work has been undertaken on the Lewisham SHMA. This has informed the content of the Local Plan and now includes a target unit size mix for affordable housing. There is clear evidence that the majority of demand is for family sized housing.	No change.

L&Q Group	2	HO 02	<p><i>Relates to Call for site</i> <i>Optimising the use of small housing sites</i> Policy H2 London Plan specifies that increasing the rate of housing delivery from small sites is a strategic priority and boroughs are advised to proactively support well designed homes on small sites.</p> <p>Under Policy HO2, LBL recognise the potential contribution of small housing sites to housing supply, including affordable homes. Whilst L&Q is supportive of this, the policy needs to recognise that viability of smaller schemes is often very finely balanced, considering the high cost of development vs the level of units that can be delivered on a site. As such, some of the development requirements in Policy HO2 could be onerous for small sites (such as the requirement to provide green infrastructure measures and maximising urban greening) and can make the difference on whether a scheme can be progressed. The LBL needs to maintain flexibility to allow innovative design solutions on small sites.</p> <p>We therefore welcome more bespoke guidance, which recognises that smaller sites have a distinct set of issues compared to larger sites and require a more flexible approach to bring these sites forward.</p>	<p>Support noted. The Council has adopted a Small Sites SPD to support the implementation of the development plan, and to boost the delivery of small sites in Lewisham.</p> <p>The Local Plan Viability Assessment indicates that the requirements can viability be delivered. Planning proposals will need to submit Viability Assessments where it is considered the policies cannot be satisfied.</p>	No change.
GHL (Leegate) Limited (Frank Knight obo)	2	HO 02	<p><i>Relates to Part 3, LEA SA 03</i> Policy HO2 (Optimising the use of small housing sites) remarks that development of small sites will play an important role in increasing housing supply in Lewisham and supporting provision for a wide range of high quality and affordable homes. This policy outlines that the Council will prepare a suite of Supplementary Planning Documents to guide the sensitive intensification of small sites. GHL supports the proposals set out in Policy HO2 (Optimising the use of small housing sites).</p>	Support noted.	No change.
GHL (Leegate) Limited (Frank Knight obo)	2	HO 02	<p><i>Relates to Part 3, LEA SA 03</i> GHL supports the provision of different housing types but requests that when drafted, the policy allows for flexibility and takes account of scheme viability on a site-by-site basis. In addition, the affordable housing tenure might change overtime in response to local needs, affordable housing policy / legislation and funding.</p>	<p>The policy incorporates flexibility by using words such as appropriate mix, target mix, reasonable proportion etc. Development proposals that do not to meet the target mix in terms of unit sizes and affordable housing can demonstrate their approach via viability assessments.</p>	No change.
L&Q Group	- 2	General HO 02	<p>We understand LBL are consulting on a Residential Small Sites SPD until 1 June 2021. We will submit detailed comments to the consultation itself, but note several key hurdles to small site developments which L&Q has faced including:</p> <ul style="list-style-type: none"> • Additional planning requirements, which are appropriate on larger sites / schemes, often have an impact on viability / likelihood of planning application being implemented on smaller sites since margins can be less; • A blanket approach to requirements that can have longer term maintenance issues on smaller sites e.g. green roofs can lead to difficulties of maintenance for landlord and ultimately lead to increased service charge for residents; • Access arrangements to small sites – specifically in relation to devising appropriate fire and refuse strategies. 	Noted. The preparation of the Small Sites SPD is outside the scope of the Local Plan.	No change.

QUOD (Landsec obo - Lewisham Shopping Centre)	2	HO 02	<p>10Chapter 7 Housing</p> <p>10.1 Chapter 7 of the Reg 18 Plan contains key policies on housing focusing on securing more genuinely affordable homes, boosting housing delivery and tailor housing to local communities.</p> <p>Housing Delivery / Meeting Local Need</p> <p>10.2 Landsec supports the need to significantly increase housing delivery in Lewisham as set out in draft Policy HO1 ‘Meeting Lewisham’s housing needs’. Landsec also supports the requirement for Councils to work positively and proactively with key stakeholders and development industry partners. This aligns with NPPG guidance (Para. 59) that sets out the Government’s objective of significantly boosting the supply of homes.</p> <p>10.3 Landsec supports the inclusion of the London Plan minimum ten-year target of 16,670 net additional homes in draft Policy HO1. Landsec acknowledges the importance of aligning local policy to the requirements in the London Plan. We would however also urge the Council to review its minimum housing requirement in light of the NPPF standard methodology for Local Housing Need. It is considered that the Standard Methodology housing need figure based on the London Plan (2,964 net additional homes) should be included in the main policy text of draft Policy HO1.</p> <p>Landsec proposes an amendment to draft Policy HO1 A (a and b) as follows: <i>“a The draft London Plan minimum ten-year housing delivery target of 16,670 net housing completions over the period 2020 to 2030 (or 1,667 net completions per year) is met and exceeded a starting point and delivery exceeding this level should be encouraged. This is in order to maximise housing delivery against the NPPF Standard Methodology target of 2,964 net homes per annum.</i> <i>b That delivery against Lewisham’s Local Housing Need figure is maximised”</i></p> <p>10.4 As set out in draft Policy HO1, Landsec strongly supports the requirement to direct new residential development to Opportunity Areas, town centres and other well-connected and sustainable locations. In accordance with London Plan guidance, Landsec proposes that the wording around town centre development is strengthened. The London Plan sets out in detail the requirement for the development of town centres to be encouraged, particularly town centres that are undergoing transformative change, have projected declining demand or significant infrastructure planned (Policy SD9 ‘Town Centres: Local partnerships and implementation’). London Plan Policy SD6 ‘Town Centres and High Streets’ also states that Council’s should promote town centres by “identifying locations for mixed-use or housing-led intensification to optimise residential growth potential.”</p> <p>10.5 Landsec proposes the inclusion on an additional paragraph to draft Policy HO1 C, specifically for Town Centre development: <i>“C i. Encouraging the development of town centres, particularly town centres that are undergoing transformative change, have projected declining demand or significant infrastructure planned. The Council will work with strategic partners to promote town centres by identifying locations for mixed-use or housing-led intensification to optimise residential growth potential.”</i></p>	Support is noted. Disagree that the standard method should be referred to in the policy and disagree with the proposed wording. Disagree with the precise wording but agree acknowledgement should be given to mixed use led growth in town centres.	No change.
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L&Q Group	2	HO 03	<p><i>Relates to Call for site</i> <i>Genuinely affordable housing</i> L&Q is supportive of LBL’s approach to affordable housing, including support for schemes which deliver 35% affordable housing, in line with the Fast Track route set out in the London Plan.</p> <p>The Council’s preferred tenure split of 70% per cent genuinely affordable (social rent or London Affordable Rent) and 30% per cent intermediate (London Living Rent or Shared Ownership) is noted (HO3 E (b)). We consider that where an applicant is bringing forward significant levels of affordable housing on a site, suggested as 35% of higher, weight should be given to the overall affordable offer to allow greater flexibility on this tenure split. This should be reflected in the considerations at HO3 L, in addition to the current drafting which requires consideration on the existing level of housing tenure and mix in the area.</p>	<p>Support noted. Following the Regulation 18 public consultation, additional work has been undertaken on the Lewisham SHMA Update. It recommends a 70:30 tenure split, given the affordability pressures in the borough. Officers therefore disagree that the 70/30 tenure split should differ on sites where more than 35% of the units will be affordable housing.</p> <p>However, the Local Plan does provide flexibility to consider housing and tenure mix on a case-by-case basis. Draft Local Plan policy HO3 (Part L) sets out that the Council may seek to alter the tenure and/or mix of affordable housing provision on a case-by-case basis.</p>	No change.
L&Q Group	2	HO 03	<p>All L&Q schemes are designed to be tenure neutral and we welcome the principles of HO3 M. As part of this, L&Q ensures the standard of amenity, communal spaces and playspace are equal across tenures and that residents have access to these. It should be noted in some instances, design and management constraints may limit residents having access to amenities and communal spaces across an entire scheme and it may be necessary to break these down on a block by block basis. For example, where courtyards are created on a block basis and access through the block is required to access that space, we may seek to limit access to just residents of that particular block in order to reduce risk of anti-social behaviour issues from unrestricted access by large numbers. However, every block would then have access to their own communal amenity space which will provide the appropriate open and play spaces required. This also enables security, building management and maintenance costs to be managed, and in turn service charges. As above, we recognise new play space in the public realm should be available for public access.</p>	<p>Support noted. The issues around management and access to spaces is noted and will be addressed through amendments to Policy QD2 on Inclusive and safe design.</p>	<p>Local Plan Policy QD2 amended to include criterion on appropriate management of private and communal amenity space, along with a reference to Government’s National Design Guide and tenure neutral housing.</p> <p>In addition, HO3 amended to include a signpost to Policy QD2.</p>
Tetra Tech Planning (John Lyon’s Charity obo)	2	HO 03	<p>The Charity fully supports the principle of affordable housing provision in new developments and its importance in creating successful communities.</p>	<p>Support noted.</p>	No change.
Lendlease (Lichfields obo)	2	HO 03	<p><i>Relates to Part 3, LNA SA 02</i> Housing <i>Policy HO3 Genuinely affordable housing & HO5 High Quality Housing Design</i> While Lendlease is supportive of Lewisham’s ambitions for high quality housing design, we note that significant parts of these policies are unnecessarily replicated from London Plan 2021 policy and supplementary guidance. In</p>	<p>Noted. The draft Local Plan policies have been included where they provide useful local interpretation, to aid the implementation of national policy or London</p>	<p>Local Plan reviewed and amended where appropriate to reduce repetition, thereby shortening the length of the Local Plan.</p>

			particular, HO3 Part F is replicated from the London Plan 2021 Policy H5 (Threshold Approach to Applications). Much of HO5 is replicated from London Plan 2021 Policy D6 (Housing Requirements).	Plan policies. It is acknowledged that there is some duplication, however this is the approach also taken by other London Boroughs.	
Notting Hill Genesis (Savills obo)	2	HO 03	<i>Relates to Call for site</i> We also note that Policy HO3 (Part L) may seek to alter the tenure and/or mix of affordable housing provision on a case-by-case basis. NHG is supportive of the need to deliver a range of housing types, and is supportive of policies which adopt a flexible approach to housing mix. This will ensure that the draft Local Plan is effective and deliverable .	Support noted.	No change.
Barratt London and the Church Commissioners (Avison Young obo)	2	HO 03	<i>Relates to Part 3, LCA SA 20</i> Draft Policy HO3 Affordable Housing Barratt London and the Church Commissioners broadly support the alignment of this Draft Policy with the threshold approach to viability set out in London Plan Policy H5 and the Mayor’s Affordable Housing and Viability SPG. Part E of Draft Policy HO3 currently identifies that, on large sites, affordable housing should be delivered at a tenure split comprising ‘70% genuinely affordable’ and ‘30% intermediate (London Living Rent)’, however, does later acknowledge that “ <i>the Council may seek to alter the tenure and/or mix of affordable housing provision on a case-by-case basis</i> ”. Barratt London and the Church Commissioners strongly support the need for flexibility concerning these matters and support the principle of affordable housing tenure being determined on a case-by-case basis, and subject to site-specific considerations.	Support noted.	No change.
LaSalle Investment Management (Savills obo)	2	HO 03	<i>Relates to Part 3, LSA SA 10</i> HO3 Genuinely affordable housing Policy HO3 states that “the strategic target is for 50 per cent of all new homes delivered in Lewisham to be genuinely affordable”. It should be recognised that the 50% figure is a strategic target to include affordable housing from all sources and not just that secured through planning obligations. A starting point of 35% provision would not fetter the Council's ability to negotiate for a higher level of provision where individual site circumstances justify such an approach.	Noted. This is reflected in the policy and the supporting text. The Local Plan specifies that a strategic target for 50 per cent of all new homes delivered in the Borough to be genuinely affordable. This is based on evidence of need, as set out in the SHMA Update 2022. We disagree that the starting point should be 35%. Instead, the Council seeks the maximum amount of genuinely affordable housing to be delivered on new housing developments, but acknowledges that proposals that achieve a minimum 35% affordable housing will be acceptable,	No change.

				in line with the London Plan threshold approach to viability.	
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	2	HO 03	<p><i>Relates to Part 3, LNA SA 14</i></p> <p>The Clients also supports delivery of new affordable homes within Lewisham. The Client acknowledges the Council’s threshold approach to viability in accordance with the London Plan Policy H5 and the principle of increased affordable housing, and for new homes to be genuinely affordable, subject to viability.</p> <p>We note that draft Local Plan Policy HO1 seeks to provide a mix of unit sizes and housing choice with reference to the Council’s Housing Strategy or other strategies. We also note that Policy HO3 may seek to alter the tenure and/or mix of affordable housing provision on a case-by-case basis. Our Client is supportive of the need to deliver a range of housing types. To ensure flexibility, we consider the following text should be added to Policy HO1 (the additions are shown underlined): <u>A flexible and end-user driven approach to housing mix should be taken when considering comprehensive redevelopment proposals.</u></p> <p>Making this change would provide flexibility and it will ensure that the draft Local Plan and site allocation can be effective in its delivery.</p> <p>We note that Policy HO3 (Genuinely affordable housing) sets out thresholds and criteria in the provision of affordable homes. Our Client’s support the policy’s approach that the provision of affordable homes is subject to viability.</p>	Support noted. Local Plan will be amended to reflect that housing mix considered on a case by case basis, but not using the suggested text.	Local Plan amended to reflect that appropriate level of housing mix to be determined on a case-by-case basis.
Transport for London Commercial Development	2	HO 03	<p>HO3 Genuinely Affordable Housing</p> <p>TfL CD is committed to delivering at least 50% affordable housing across its development portfolio in London and looks forward to working with the borough to bring forward appropriate levels of affordable housing on sites in our ownership.</p>	Noted.	No change.
The Renewal Group (Carney Sweeney obo)	2	HO 03	<p><i>Relates to Part 3, LNA SA 08</i></p> <p>Policy HO3 Genuinely Affordable Housing</p> <p>Affordable housing provided as part of Build to Rent developments in line with Policy H11 of the London Plan should be supported and needs to be set out in the Lewisham Local Plan.</p>	Noted.	Local Plan Policy HO1 amended to reference Build to Rent.
SGN (Quod obo)	2	HO 03	<p><i>Relates to Part 3, LSA SA 01</i></p> <p>5.17 SGN support the strategic principles of Policy HO3. Point J) outlines that small sites of less than 10 dwelling units will be required to make a financial contribution towards the delivery of affordable housing and should seek to deliver this on-site. This requirement is contrary to Paragraph 63 of the NPPF and should be removed.</p>	Noted. The Lewisham SHMA indicates a significant and acute need for more genuinely affordable housing in the borough. To help address this need, the Local Plan requires that new housing developments delivering less than 10 dwellings should seek to deliver on-site affordable housing wherever practical and feasible. Where provision	Local Plan amended with further details on affordable housing contributions for small sites.

				<p>cannot be delivered on-site, a financial contribution will be sought. The Local Plan Viability Assessment indicates that the small sites contribution will not adversely impact on viability.</p> <p>Local Plan policy HO3 will be amended to provide further clarity on how the small sites contributions.</p>	
Phoenix Community Housing (BPTW obo)	2	HO 03	<p>The setting of affordable housing requirements and thresholds in line with the London Plan and the Mayor’s threshold approach to viability is, of course, supported. The 70:30 tenure mix split between genuinely affordable and intermediate housing products is also supported, however there should be explicit policy support for maximising the genuinely affordable proportion.</p> <p>The NPPF definition of Affordable Rent as up to 80% of local market rent is unaffordable to many Londoners and so we would prefer to see the term ‘low cost homes for Londoners on low incomes’ (or similar) used instead of ‘genuinely affordable’ to describe the 70% portion. Clarity on rent levels and clearer definitions in the Plan would be welcomed by PCH residents. PCH is aware that Bellingham members are responding to the draft Plan and supports their proposal that genuinely affordable social rents are required.</p> <p>Similarly to wheelchair housing, we would welcome the insertion of flexibility that enables Housing Associations / Registered Providers to meet the 70:30 split across a portfolio of sites, given that site specific circumstances can often justify the introduction of shared ownership in such areas that meet the housing need of certain households with low annual incomes, whereas other areas may never be truly affordable to purchase. Further, there are long-term management cost savings in being able to wholly retain and manage, or wholly sell an affordable scheme.</p> <p>A more radical way of equipping Housing Associations to compete with major developers would be the introduction of building credits for over-provision of affordable housing that could be sold on to private schemes. In any case, we would encourage some additional policy recognition where affordable housing schemes deliver over and above the policy target. For example greater flexibility on mix of units (subject to demonstrating local housing need), or acknowledgment that any overprovision could be taken off-set at other developments within close proximity, enabling concentration of affordable units on the most appropriate sites within a wider estate infill strategy.</p>	<p>Support is noted. Rent levels are beyond the scope of the Local Plan. The Local Plan already seeks the maximum amount of genuinely affordable housing to be delivered on new housing developments. There is no need to change the definition of genuinely affordable as the Local Plan already acknowledges this to be social rent or London Affordable Rent only. Disagree with the need for building credits or for a 70:30 split across a portfolio of sites as the Local Plan already allows for flexibility as there can be alterations to the tenure and/or mix of affordable housing provision on a case-by-case basis, having regard to the existing levels of housing tenure and mix in the area, along with development viability.</p>	<p>No change.</p>
QUOD (Landsec obo - Lewisham Shopping Centre)	2	HO 03	<p>Affordable Housing</p> <p>10.8 Landsec supports the threshold approach to affordable housing and viability aligned to the London Plan as set out in draft Policy HO3 G ‘Genuinely affordable housing’. However, at present the text regarding the benchmark existing use value does not make clear that a premium should be added to incentivise land to be released for redevelopment. Paragraph 4.5.3 of the London Plan states that the <i>“benchmark land value is based on the current use value of a site plus an appropriate site premium”</i>. Landsec proposes that draft Policy HO3 G be amended as follows:</p>	<p>Noted</p>	<p>H03 Affordable Housing Policy amended to better reflect higher level policy</p>

			<p><i>“G Where the Viability Tested Route is used and a viability assessment is submitted to support the level of affordable housing provision made by a proposal, this must be based on a standard residual valuation approach, with the benchmark existing use value of the land taken as the existing (plus an appropriate premium to the landowner) /alternative use value...”</i></p> <p>10.9 As set out in draft Policy HO3 M, Landsec agrees that new affordable housing development must be designed to a high-quality standard and homes should be indistinguishable from market units. Landsec however notes that, in line with leasehold law, private residents cannot subsidise amenities for affordable housing residents. The text should be amended to state that affordable residents will be given the option to access amenities if they are able / want to pay the service charge. Landsec propose the following revision to draft Policy HO3 M:</p> <p><i>“M ...Development should be sensitively integrated into the site and its surroundings, with affordable housing units being indistinguishable from market units in terms of quality of design and materials, space standards and access and amenity provision. All residents should be given the option to access onsite amenities.”</i></p> <p>10.10 Landsec agrees that for genuinely affordable housing (i.e. London Affordable Rent / SocialRent) residents should be provided with lifetime tenancies (Para. 7.34). Landsec seeks clarification that this does not apply to intermediate tenures which cannot have the same tenancy agreements as social rent (but do of course have other tenancy protections governed by separate law and policy). Landsec proposes the following amendment to Paragraph 7.34: <i>“7.34 ... For genuinely affordable homes, we will seek that residents are provided with lifetime tenancies, ideally in perpetuity.”</i></p> <p>10.11Landsec agrees that Shared Ownership housing costs should be demonstrably affordable (Para. 7.43). Landsec notes that Shared Ownership income thresholds should be linked to the London Plan and London Plan AMR. The London Plan AMR states in paragraph 3.74 that the Shared Ownership income threshold will be reviewed / updated on an annual basis. It is also considers that the affordability calculation be aligned to the formula in the London Plan AMR (annual housing cost should be no greater than 40% of a household’s net income). Landsec proposes the following amendment to Paragraph 7.43.</p> <p><i>“7.43 ... Shared ownership products may also be an acceptable form of tenure, where the total monthly costs are demonstrably affordable. The affordability threshold for intermediate tenures should be aligned to the London Plan Annual Monitoring report which is updated annually. For dwellings to be considered affordable, annual housing costs, including mortgage payments (assuming reasonable interest rates and deposit requirements), rent and service charge, should be no greater than 40 per cent of a household’s net income.”</i></p>		
L&Q Group	2	HO 04	<p><i>Relates to Call for site</i></p> <p><i>Housing estate maintenance, renewal and regeneration</i></p> <p>As a long-term landlord of the homes we develop, L&Q is committed to high quality living environments that can be maintained at decent standards whilst</p>	Support noted.	No change.

			keeping services changes for residents’ low. L&Q strongly support the aspirations of Policy H04.		
The Renewal Group (Carney Sweeney obo)	2	HO 05	<p><i>Relates to Part 3, LNA SA 08</i></p> <p>Policy H05 High Quality Housing Design</p> <p>Part G of this policy states that proposals for single aspect dwellings will be resisted and should only be considered in exceptional circumstances, where it can be suitably demonstrated that it will provide for a more appropriate design solution than a dual aspect dwelling. This policy goes further than the London Plan and associated design guidance, which seeks to avoid <i>north facing</i> single aspect dwellings (our emphasis), rather than all single aspect dwellings. There is no justification for resisting single aspect dwellings which face east, west and south and this policy needs to be amended accordingly.</p>	Noted. Agree that the policy should be amended to provide greater flexibility for considering single aspect dwellings, whilst ensuring high standard of design and amenity.	Local Plan amended to remove ‘exceptional circumstances’ clause and make clear the requirements on single aspect dwellings, also signposting need to avoid north facing single aspect dwellings in line with London Plan guidance.
SGN (Quod obo)	2	HO 05	<p><i>Relates to Part 3, LSA SA 01</i></p> <p>5.18 SGN are generally supportive of draft Policy H05 ‘High Quality Housing Design’, although are concerned that the requirements of Part G are overly restrictive and exceed the requirement of the London Plan and its Housing Guidance. The draft policy includes requirements which may limit development unnecessarily and this should be reviewed.</p>	Noted. Agree that the policy should be amended to provide greater flexibility for considering single aspect dwellings, whilst ensuring high standard of design and amenity.	Local Plan amended to remove ‘exceptional circumstances’ clause and make clear the requirements on single aspect dwellings, also signposting need to avoid north facing single aspect dwellings in line with London Plan guidance.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	HO 05	<p>Housing Standards</p> <p>10.14Landsec are generally supportive of draft Policy H05 ‘High Quality Housing Design’, although are concerned that the requirements of Part G are overly restrictive and exceed the requirement of the London Plan and its Housing Guidance. The draft policy includes requirements which may limit development unnecessarily. Landsec would like to work with the Council to explore further flexibility with regards this policy.</p>	Part G has been amended to make the reference to single aspect dwellings more flexible, in line with the London Plan, and has been moved to a new policy QD8.	Local Plan Policy QD8 amended to make the wording more flexible.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	HO 06	<p>Care Home Accommodation</p> <p>10.12In respect of Policy H06 (Accommodation for older people) Landsec supports the requirement for specialist older person’s accommodation where it meets an unmet local housing need. Such accommodation can play a valuable role in improving older persons’ quality of life and contributing to mixed and balanced communities. Landsec however notes that the policy should recognise the challenges of delivering specialist older persons / care home accommodation compared to conventional housing. This includes larger space standards, additional fit out costs, and a less efficient net:gross ratio. The policy should be amended to acknowledge that, in order to secure older persons housing and the benefits it brings, flexibility may be needed in other policies including affordable housing. The requirement for flexibility is recognised in the London Plan which states that ‘the tenure split requirement for specialist older persons housing may differ’ from conventional housing (paragraph 4.13.11).</p> <p>10.13It is proposed that Policy H06 should be amended to include an additional paragraph stating the following:</p>	Disagree that there should be a trade-off between affordable housing and other forms of housing.	No change.

			<p><i>“The challenges of delivering accommodation for older people are recognised. Development proposals for this type of housing will be assessed on a case-by-case basis, and policy flexibility will be considered where necessary (including for affordable housing). Consideration will be given to the level of managed care provision, and onsite facilities.”</i></p>		
Tribe Student Housing (Avison Young obo)	2	HO 08	<p><i>Relates to Part 3, LNA SA 06</i></p> <p>The draft site allocation is for comprehensive employment-led redevelopment. Co-location of compatible commercial, residential and complementary main town centre uses. We consider there should be greater flexibility in the site allocation to reflect the suitability of other uses on the site, including PBSA.</p> <p>Draft Policy HO8 sets out that development proposals for PBSA must be appropriately located. The Trundley’s Road site represents an appropriate location for PBSA as follows:</p> <ul style="list-style-type: none">• The site has a current PTAL rating of 2 but this is expected to improve to PTAL 3 upon completion of the New Bermondsey Station, situated along Surrey Canal Road which is 400m north-west of the Site. At present, the nearest rail stations are at New Cross and New Cross Gate, located approximately 1.2km south of the Site. These provide access to London Overground and National Rail services. Deptford and South Bermondsey stations are also located approximately 1.5km of the Site (east and west respectively) providing further access to National Rail services. The nearest bus stop which provides access to Route 225 are located adjacent to the Site on Trundley’s Road;▪ There are good walking, cycling and public transport links to nearby town and district centres which provide a good range of local services and amenities – as shown below: <p><i>LB Lewisham officer note: Table 1 and Figure 1: Proximity of the site to nearby town and district centres are included in the original representation. The table and figure show the location of, and details about, the centres at Lewisham, Deptford, New Cross and New Cross Gate.</i></p> ▪ The site is situated in a location where a number of committed developments are coming forward which include a significant amount of non-residential floorspace at ground floor. Therefore, in the emerging context the site will be in a location that benefits from good provisions of shops, services, leisure and community facilities appropriate to the student population – as shown below: <p><i>LB Lewisham officer note: Table 2: Committed developments in the vicinity of the site is included in the original representation. The table lists details about Timberyard Deptford Landings, Anthology Deptford Foundry, Convoys Wharf and Grinstead Road.</i></p> ▪ The provision of PBSA would not lead to an overconcentration in this location and would help create mixed and balanced communities when provided as part of a mixed-use development; and	<p>The supplementary information is noted. Responses to other comments supporting this representation set out elsewhere in the Consultation Statement.</p> <p>Where a Local Plan site allocation makes provision for housing/residential uses, it does not normally specify the nature of this use. This will be established through the planning approvals process. Exceptions are made, for instance, with gypsy and traveller accommodation.</p>	<p>Surrey Canal Road and Trundleys Road site allocation updated to reflect the planning consented granted for the site.</p>

			<p>▪ The site is located in proximity to a number of Higher Education Institutions both within and outside the borough, including:</p> <p><u>Higher Education Providers within a 1 mile radius of the site (15 minutes or less travel time by public transport):</u></p> <ul style="list-style-type: none"> ○ Goldsmiths College, University of London; and ○ Coventry University International Study Centre. <p><u>Higher Education Providers within a 2.5 mile radius of the Site (40 minutes or less travel time by public transport):</u></p> <ul style="list-style-type: none"> ○ The University of Greenwich (main campus); ○ Ravensbourne University London (main campus); ○ Trinity Laban Conservatoire of Music and Dance (main campus); ○ Kings College London (Guy’s campus and Denmark Hill campus); ○ University of Sunderland (London campus); ○ University of Gloucestershire (London campus); ○ University of Cumbria (East India Dock Road campus); and ○ Queen Mary University of London (Whitechapel campus). <p>In line with the above, the site has been identified by the University of London as a good location for student accommodation to serve Goldsmiths College, which has resulted in the planning application for student accommodation on the site.</p> <p>Moreover, the provision of PBSA on the site would free-up conventional housing stock for local people whilst contributing towards London-wide targets for PBSA bedspaces and overall housing need in the borough. There is an unmet demand for student accommodation and this is expected to increase due to COVID-19 and therefore the provision of PBSA will become more important in order to protect the existing conventional housing stock in the borough for family accommodation. We therefore consider the draft site allocation should be amended to include PBSA as an acceptable use on the site.</p>		
Fifth State and (Avison Young obo)	2	HO 08	<p><i>Relates to Part 3, LNA SA 16</i></p> <p><i>Draft Policy HO8 – Purpose built student accommodation</i></p> <p>The NPPF Paragraph 11 requires that: a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; and b) that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses. NPPF Paragraph 61 goes on to state that <i>‘the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including [...] students).’</i></p> <p>London Plan Policy H15 considers purpose-built student accommodation (PBSA) and requires Boroughs to ensure that local and strategic need for PBSA is addressed. The overall strategic requirement for PBSA in London is for 3,500 bed spaces to be provided annually over the plan period. Borough level targets for PBSA bed spaces are not provided as it is acknowledged that the location of need</p>	Noted. The approaches in the draft Local Plan regarding PBSA are considered to be justified. The Lewisham SHMA points to the significant amount of PBSA recently delivered in the Borough including the proliferation of off-campus accommodation. Some 1,686 units were delivered and consented from 2016 to 2021, or an average of 337 per year. Additional	Local Plan supporting text amended to cross-reference London Plan policy H15 and details around Fast Track and Viability Tested routes for student housing.

		<p>will vary over the plan period in line with higher education institution growth and expansion plans, together with the availability of appropriate sites.</p> <p>The Draft Local Plan is underpinned by the Lewisham Strategic Housing Market Assessment (2019) which considers the need for different types of accommodation and affordable housing needs drawing on demographic data and information provided from LBL and stakeholder consultation.</p> <p>The main finding in respect of student housing is that <i>‘there is a significant student population in Lewisham that is partly housed in the private rented sector. The future housing requirements for this group is uncertain due to global economic issues and Brexit. Whilst pressure on the private rented sector from students has been mitigated by purpose built student housing, the sector will continue to be subject to extreme levels of demand from students unable to afford purpose built housing and the growing trend of non-student households being able to afford home ownership and being ineligible for social housing.’</i> The recommendation goes on to state that 35% of student housing should be provided as affordable units to help meet the needs of students.</p> <p>Whilst the SHMA provides an overview of student accommodation provided at Goldsmiths University and the University of Greenwich, no conclusion is drawn on the need for the delivery of PBSA in Lewisham. The SHMA acknowledges that there will continue to be pressure on the private rented sector to accommodate students, but does not identify how much PBSA is needed to address future need and demand. As such we question whether the NPPF requirement to objectively assess need for student housing has been adequately fulfilled by this assessment. As such, we would recommend transparency around student housing need is provided within the Draft Local Plan.</p> <p>Notwithstanding concerns regarding the evidence base, draft Policy HO8 provides a supportive basis for assessing development proposals for PBSA. The policy wording broadly reflects London Plan Policy H15 requirements for PBSA, which Fifth State endorses.</p> <p>Supporting paragraph 7.7 recognises that Lewisham is home to a number of further and higher education providers, particularly in north Lewisham which is home to Goldsmiths College, Trinity Laban Conservatory of Music and Dance and Lewisham College, as well as the nearby Greenwich University. As such it is considered that applications for PBSA coming forward in the north of the borough will be able to satisfactorily demonstrate that they will help to meet an identified strategic need for student accommodation (meeting policy requirement HO8 Part A(a)).</p> <p>Fifth State acknowledge that the Borough’s main strategic requirement is for genuinely affordable, conventional housing, and that PBSA will be counted as delivering homes against the Borough’s strategic housing target and will be counted on a 2.5:1 basis (i.e. two and half PBSA bedrooms to one unit of conventional housing).</p> <p>In respect of affordable student housing, Fifth State note that the London Plan policy (now H15) will be applied, which requires 35% affordable student</p>	<p>student bedspaces have been consented since then. The London Plan sets out an overall target for London of 3,500 PBSA units per annum across all boroughs. In this context, Lewisham is making a significant contribution to meeting London’s needs for PBSA. A carefully managed approach to additional capacity is therefore required. Development proposals must clearly demonstrate that the provision will not lead to a harmful overconcentration of PBSA. It is also critical that they do not compromise or suppress the delivery of conventional housing, for which need in Lewisham is greatest. The London Plan makes clear that meeting the requirement for PBSA should not undermine policy to secure mixed and inclusive neighbourhoods.</p>	
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			accommodation in order to meet the Fast Track Route. Where this affordable target is not met, applications must follow the Viability Tested Route. However, paragraph 7.80 of the draft Local Plan states that ‘ <i>at least 35% of PBSA should be secured as affordable housing</i> ’ but does not provide any further guidance on circumstances where 35% affordable student accommodation is not proposed. We request that this sentence is amended to read: <u>‘London Plan Policy H15 provides that at least 35% of PBSA should be secured as affordable housing in order to follow the Fast Track Route (whereby no financial viability assessment is required to be submitted with the application). Should the proposals not meet the threshold of 35% affordable housing, applications must follow the viability tested route.’</u>		
QUOD (Landsec obo - Lewisham Shopping Centre)	2	HO 08	Student Accommodation 10.17Landsec supports the inclusion of a specific policy (draft Policy HO8 ‘Purpose Built Student Accommodation’) for purpose-built student accommodation. 10.18Landsec does not support the need for priority to be given to sites located in proximity to the education institution(s) (draft Policy H08 B (c) (ii)). Whilst accessibility is an important test for student accommodation, this should not simply be measured by proximity – regard should also be had to other factors such as transport connections. The policy should be aligned with the London Plan which states “ <i>Boroughs, student accommodation providers and higher education providers are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes</i> ” (Policy H15 ‘Purpose-built student accommodation’). Landsec proposes that draft Policy H08 paragraph B (c) (ii) be removed. 10.19Landsec supports the definition of affordable student accommodation being aligned to the London Plan at draft Policy H08 A (c). It is however proposed that the ability for a student led scheme to be ‘Fast Track’ is included in the main policy text. The London Plan (Policy H15) states “ <i>to follow the Fast-Track Route, at least 35 per cent of the accommodation must be secured as affordable student accommodation or 50 per cent where the development is on public land or industrial land</i> ”. Landsec proposes an amendment to draft Policy H08 A (c) as follows: <i>“A (c) Make provision for affordable student accommodation, including the ability to follow the Fast-Track route, in line with draft London Plan Policy H15 H17 (Purpose-built student accommodation).”</i>	Disagree that sites in proximity to educational institutions should not be prioritised. No need to replicate policy from the London Plan regarding the fastrack route.	Local plan amended to make reference to maximum level of accommodation secured as affordable student accommodation.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	HO 09	Large-Scale Purpose-Built Shared Accommodation 10.15Landsec supports the requirement in Policy H09 ‘Housing with shared facilities (Houses in Multiple Occupation)’ that large scaled shared living accommodation development should only be permitted where it can be suitably demonstrated that there is a local need. Landsec notes that housing need should be assessed on a borough wide level and not just on a more local level. It is also noted that demand and not just need for this type of housing should be given material consideration. Landsec also proposes that the negative policy wording (Part D) to resist developments of this type should be removed. This is to align to Policy H9 ‘Ensuring the best use of stock’ / Policy H16 ‘Large-scale purpose-built	Noted.	Local plan amended by removing negative policy wording and referring to local market demand.

			<p>shared living’ of the London Plan which seeks to ensure the best use of stock, expects boroughs to take into account the role of HMOs / shared living accommodation in meeting local and strategic needs and to promote the role of this type of housing in reducing pressure on other elements of the housing stock.</p> <p>10.16Landsec proposes to amend Policy H09 D as follows: <i>“Large-scale purpose-built shared living accommodation in the Sui Generis Use Class will generally be resisted as this type of use compromises opportunities to deliver conventional housing in the Borough. Development proposals will only be permitted where it is suitably demonstrated that:</i> <i>(a) They meet an identified local need or demand for the type of housing proposed...”</i></p>		
(Avison Young obo)	2	Chapter 7	<p>Chapter 7 confirms the approach to housing growth within Lewisham over the Plan period. Policy HO1 states “Development proposals must make the best use of land and optimise the capacity of housing sites in order to ensure: <i>a. The draft London Plan minimum ten-year target of 16,670 net housing completions over the period 2020 to 2030 (or 1,667 net completions per year) is met and exceeded; and</i> <i>b. That delivery against Lewisham’s Local Housing Need figures is maximised.”</i></p> <p>Paragraph 7.5 confirms the Draft Plan was prepared at a time when confirmation over the approach to calculating housing need for the London Borough’s had not been confirmed by the London Mayor and consequently the London Plan. Lewisham have therefore calculated local housing need in line with the NPPF’s standard methodology (set out in the Strategic Housing Market Assessment).</p> <p>Paragraph 5.27-5.31 of the Strategic Housing Market Assessment 2019 provides a summary of the local housing need calculations underpinning the Local Plan. Paragraph 5.30 confirms that due to the substantial need identified as a result of applying the NPPF’s standard methodology a cap based on current housing targets is introduced. This is applied to the housing need target based on the 2016 adopted local plan (1,939 dwellings per annum) and the 2017 draft London Plan (2,964 dwellings per annum).</p> <p>Paragraph 7.8 of the Draft Local Plan confirms that one of the aims of this Regulation 18 consultation is to better understand whether there are any additional sites that could feasibly be delivered within the Plan period and whether the strategic sites (site allocations) include in Part 3 of the Local Plan are deliverable and developable, particularly according to the indicative capacities of and timeframes set out.</p>	<p>Following the Regulation 18 consultation, and the adoption of the London Plan, the SHMA has been updated. It recognises that the London Plan is responsible for establishing London wide need and disaggregating this to London Boroughs. Therefore the current position for Lewisham is a minimum housing need figure of 1,667 p.a., based on the adopted London Plan.</p>	<p>Local Plan amended in line with the findings of the updated SHMA.</p>
QUOD (Landsec obo - Lewisham Shopping Centre)	-	New policy Build to Rent	<p>Build to Rent</p> <p>10.20Landsec notes that there is no specific policy for Build to Rent. The importance and popularity of Build to Rent has grown significantly over recent years with London Plan (Policy H11 ‘Build to Rent’) stating that <i>“Boroughs should take a positive approach to the Build to Rent Sector”</i>. The London Plan identifies that Build to Rent developments can make a positive contribution to increasing housing supply by attracting inwards investment, accelerating delivery, and ensuring investment / placemaking through single ownership. The Build to Rent sector also provides better management standards and better-quality homes than much of the mainstream private rented sector.</p>	<p>Comments are noted.</p>	<p>Local Plan Policy HO1 amended to reference Build to Rent.</p>

			<p>10.21It is also important for the Reg 18 Plan to include some recognition of the fact that Build to Rent operates a different model to Build to Sale. Build to Rent relies on income through rent over a number of years, rather than an upfront return on sales. Because of this, in some circumstances Build to Rent may not be able to compete for land on an equal footing with speculative Build for Sale, as it may generate lower initial land values (London Plan Para.4.11.2).</p> <p>10.22The viability constraints of Build to Rent are clearly defined in the draft Local Plan Viability Assessment (BNPP, 2019) which states <i>“that the viability of build to rent schemes is challenging”</i>. The viability testing shows that in a significant number of cases, Build to Rent schemes are unable to provide any affordable housing.</p> <p>10.23The site has been tested as part of this assessment and shows a maximum provision of between 0% and 10% affordable housing. The BNPP report states that viability testing excludes all ‘exceptional costs’ i.e. abnormal costs that are over and above standard build costs. It can therefore be assumed that the viability testing overstates the viable quantum of affordable housing that can be delivered on the site.</p> <p>10.24Landsec proposes that a specific policy for Build to Rent be included in the Reg 18 Plan, aligned to Policy H11 in the London Plan. The key inclusions are as follows: - Affordable housing offer can be solely Discounted Market Rent (DMR). - The homes are held as Build to Rent under a covenant for at least 15 years. - To follow the Fast-Track Route, Build to Rent schemes must deliver 35% affordable housing with 30% of DMR homes to be provided at London Living Rent levels and 70% as a range of genuinely affordable rents.</p>		
SEGRO (CBRE Limited obo)	-	Employment Land Study	<p><i>Relates to Part 3, LNA SA 04</i></p> <p>5. Deptford Trading Estate</p> <p>As there is a positive policy context for intensification on existing industrial sites, we are surprised the Lewisham Employment Land Study provides a Site Assessment for the Blackhorse Road SIL, which includes Deptford Trading Estate, as “this cannot be expanded”. It is not clear whether this refers to the boundaries of the SIL or its capacity for intensification. If the latter, we note that the exercise undertaken to come to this conclusion is clearly a very high level one and is not qualified by any feasibility testing or environmental assessment. Although SEGRO are not actively promoting intensification of the site at this time, based on our significant development experience in London, we suspect this will be feasible subject to detailed matters including highways and design.</p> <p>Whilst this evidence does not form part of the development plan and will not form the basis of any decision making, we thought it prudent to highlight this point in our representations.</p>	Noted. The Employment Land Study considered whether there was scope for expansion of selected employment land sites, taking into account surrounding land uses.	No change.
Tetra Tech Planning (John Lyon’s Charity obo)	2	Chapter 08	The “Economy” policies should also remove reference to the revoked Use Classes within A and B and make reference to the new Use Class E where appropriate.	Noted. The Local Plan will be amended to reflect and respond to these changes.	Local Plan Part 2 Economy and Culture section amended throughout to reflect and in response to changes to the Use

					Classes Order, including the new Class E.
Fifth State and (Avison Young obo)	2	EC 01	<i>Relates to Part 3, LNA SA 16</i> Draft Policy EC1 – A thriving and inclusive local economy Support and promotion of cultural and creative industries in the borough and the creation of the Lewisham North Creative Enterprise Zone (CEZ) covering the Lower Creekside area is strongly supported by Fifth State.	Support noted.	No change.
Cockpit Arts (The Planning Lab obo)	2	EC 01	<i>Relates to Part 3, LNA SA 14</i> <ul style="list-style-type: none"> • CA broadly endorses this policy and the link to Policy EC1 which specifically protects existing cultural venues and uses. • CA is generally supportive of policy that recognises and supports development that strengthens the local economic base. • We strongly support policy that requires provision of genuinely affordable workspaces for creative industries, independent makers, etc. We encourage LB Lewisham to consider the need to retain specific maker space (i.e. dirty/messy/noisy light industrial creative space) which has different requirements from digitally-driven creative businesses. • CA is supportive of the creation of Lewisham North Creative Enterprise Zone (see also response to LNA3) and policies that seek to protect and enhance creative industries in the borough. 	Support noted.	No change.
Artworks Creekside (Avison Young obo)	2	EC 01	<i>Relates to Part 3, LNA SA 16</i> Draft Policy EC1 – A thriving and inclusive local economy Support and promotion of cultural and creative industries in the borough and the creation of the Lewisham North Creative Enterprise Zone (CEZ) covering the Lower Creekside area is strongly supported by Artworks Creekside.	Support noted.	No change.
The Renewal Group (Carney Sweeney obo)	2	EC 01	<i>Relates to Part 3, LNA SA 08</i> Policy EC1 A Thriving and Inclusive Local Economy We note that Part B(a) of this policy protects existing cultural venues and uses. It is important that such venues are only protected where they are viable and where this is a reasonable approach, having regard to other objectives. It is also important that meanwhile cultural venues and uses are not protected so as to prevent wider and final development proposals coming forward. It is important that the policy is adjusted to provide clarity on the matters raised above.	Noted. The Local Plan will be amended to reflect the importance of viability as key consideration for protection of cultural venues.	Local Plan amended to provide further clarification on protection of cultural venues and development proposals involving their loss, with viability of the venue a key consideration.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	EC 01	11.1 Chapter 8 of the Reg 18 Plan contains key policies on the Economy and Culture focusing on protecting and revitalising industrial areas; making town centres more vibrant places and securing high quality affordable workspace. A thriving and inclusive local economy 11.2 Landsec welcome and support Lewisham’s intention in draft policy EC1 ‘A thriving and inclusive local economy’ to ensure access to high quality education, training and job opportunities and help facilitate the continued growth and development of local cultural, creative and digital industries. This aligns with Landsec’s key priorities. 11.3 The Reg 18 Plan acknowledges the <i>“pressing need to reduce inequality and the negative consequences of deprivation in the Borough, and to ensure equality of opportunity, especially for those living in the Borough’s most deprived areas”</i> (Para 2.18). The plan includes various references to ensuring equality of		

			opportunity through new development. Landsec welcome this and would seek to work with Lewisham to ensure this is the case.		
Notting Hill Genesis (Savills obo)	2	EC 02	Lewisham Local Plan Regulation 18 Stage Main Issues And Preferred Approaches Document –representations	Noted. Responses to additional representations set out elsewhere in the Consultation Statement.	No change.
	2	Table 8.1	The draft Local Plan proposes that the site be subject to the following emerging planning policy designation: Forms part of a Locally Significant Industrial Estate (LSIS).		
	2	Figure 18.2	We note the draft Local Plan references or illustrates the site and the wider Malham Industrial Estate in: Figure 3.9 (Borough-wide Spatial Strategy Plan); Table 8.1 (Lewisham’s Employment Land Hierarchy) – LSIS; Figure 8.1 (Employment Land Hierarchy); Figure 18.2 (West Area Key Diagram); and Schedule 4 (Designated employment land).		
	5	Schedule 4			
Tribe Student Housing (Avison Young obo)	2	EC 02	<i>Relates to Part 3, LNA SA 06</i>	Noted. It is acknowledged that changes to the Local Plan are required for conformity with the London Plan. Specifically, to reflect that SIL sites are not suitable for co-location. Sites released from SIL through the plan-led process will be re-designated as LSIS, reflecting the draft Local Plan approach that such sites are important employment sites and development should ensure there is no net loss of industrial capacity.	Local Plan amended to reflect that SIL sites are not suitable for co-location. Sites released from SIL through the plan-led process will be re-designated as LSIS.
	2	Table 8.1	Draft Policy EC2 sets out the approach to the protection of employment sites and delivery of new workspace. Part D confirms that proposals for the co-location of employment and other compatible uses will only be supported at selected SIL sites, and where it can be suitably demonstrated that the requirements of draft London Plan policies E5 and E7 and other relevant Local Plan policies, are satisfied. This includes the Trundley’s Road site currently within the Surrey Canal Road SIL, which is proposed to be de-designated from SIL (as discussed further below). On the basis that the Trundley’s Road site is to be de-designated from SIL, Policy EC2 should clarify that the Trundley’s Road site no longer forms part of the Surrey Canal Road SIL. For clarity, an additional row could be included in Table 8.1 specifically for such ‘co-location sites’.		
Trundley’s Road Ltd (Avison Young obo)	2	EC 02	<i>Relates to Part 3, LNA SA 06</i>	Noted. It is acknowledged that changes to the Local Plan are required for conformity with the London Plan. Specifically, to reflect that SIL sites are not suitable for co-location. Sites released from SIL through the plan-led process will be re-designated as LSIS, reflecting the draft Local Plan approach that such sites are important employment sites and development should ensure there is no net loss of industrial capacity.	Local Plan amended to reflect that SIL sites are not suitable for co-location. Sites released from SIL through the plan-led process will be re-designated as LSIS.
	2	Table 8.1	Draft Policy EC2 sets out the approach to the protection of employment sites and delivery of new workspace. Part D confirms that proposals for the co-location of employment and other compatible uses will only be supported at selected SIL sites, and where it can be suitably demonstrated that the requirements of draft London Plan policies E5 and E7 and other relevant Local Plan policies, are satisfied. This includes the Trundley’s Road site currently within the Surrey Canal Road SIL, which is proposed to be de-designated from SIL (as discussed further below). On the basis that the Trundley’s Road site is to be de-designated from SIL, Policy EC2 should clarify that the Trundley’s Road site no longer forms part of the Surrey Canal Road SIL. For clarity, an additional row could be included in Table 8.1 specifically for such ‘co-location sites’.		

Fifth State and (Avison Young obo)	2	EC 02	<p><i>Relates to Part 3, LNA SA 16</i> Draft Policy EC2 – Protecting employment sites and delivering new workspace</p> <p>Draft Policy EC2 seeks to safeguard land for commercial and industrial uses through retaining employment capacity within Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS). We note that Lower Creekside is identified as a LSIS which are identified in Table 8.1 as providing for the borough’s ‘<i>main local concentrations of commercial and industrial uses, which perform a niche role to support the functioning of the sub-regional and local economy. They provide workspace for micro, small and medium sized businesses, including the cultural, creative and digital industries. Protected for commercial and industrial uses, with priority given to Class B1 commercial and light industrial uses.</i>’</p> <p>Whilst forecast need has been identified for 21,800 sqm of net additional employment floorspace, it is noted that this refers to previous Use Class B1. This has since been replaced by Use Class E(g) (Use Classes Order 1987 as amended in September 2020). <u>Draft Policy EC2 and the supporting text should be updated to reflect the latest use classes.</u></p>	Noted. The Local Plan will be amended to reflect and respond to these changes.	Local Plan Part 2 Economy and Culture section amended throughout to reflect and in response to changes to the Use Classes Order, including the new Class E.
Fifth State and (Avison Young obo)	2	EC 02	<p><i>Relates to Part 3, LNA SA 16</i> Part B(a) of draft Policy EC2 states that within SIL and LSIS locations industrial capacity should be retained ‘<i>ensuring no net loss of floorspace and operational yard space along with intensifying employment development, including by facilitating the co-location of employment and other compatible uses through the plan-led process</i>’. The supporting explanatory text advises that safeguarding of employment land includes ‘<i>floorspace, yard space for operations and servicing space</i>’.</p> <p>Whilst the Owners and Developer of 5-9 Creekside support the principle of intensifying employment development and the ability to co-locate employment uses alongside other uses, they do not agree with an approach which seeks to protect yard space. London Plan Policy E7 supports efficient use of employment land to create additional industrial capacity, whilst having regard to operational requirements (including servicing). Figure 6.2 of the London Plan illustrates how existing industrial sites with large areas of yard space can be intensified through appropriate development.</p> <p><u>It is requested that the no net loss principle in draft Policy EC2 Part B(a) for floorspace and operational yard space is removed. This reflects the removal of the ‘no net loss’ approach from the draft London Plan E7, which has now been removed in the adopted version of the London Plan, which has been replaced for a requirement for intensification to provide additional capacity.</u></p> <p><u>The provision of ‘additional capacity’ could relate to the provision of replacement or additional floorspace or indeed an increase in the number or jobs or improvements to the quality of the workspace proposed.</u></p> <p><u>In respect of yard space, retention of existing yard space should not be sought as the delivery of necessary yard space and adequate servicing arrangements should be considered as part of the development proposals, depending on the type of employment space proposed (in line with draft</u></p>	<p>Noted. The London Plan provides that Local Plans can include provisions to retain SIL, LSIS and other industrial sites / capacity, taking into account local evidence. The Employment Land Study makes clear that Lewisham has experienced a significant loss of capacity and recommends that remaining capacity be retained. The no net loss principle is therefore considered to be justified and in conformity with the London Plan.</p> <p>However it is acknowledged that the draft Local Plan definition of industrial capacity should be amended for conformity with the London Plan.</p>	Local Plan amended to provide new definition of industrial capacity and removal of 65% plot ratio.

			<p><u>Policy EC3). The requirement for operational yard space varies between typology, use class and operator and to protect all operational yard space is overly restrictive and does not allow successful intensification of designated employment sites and also limits opportunities for co-location.</u></p> <p>It is noted that the explanatory text to Policy EC3 refers to the no net loss principle and a 65% plot ratio benchmark for assessing industrial capacity. Again <u>the reference to the 65% plot ratio has been removed from the adopted version of the London Plan (following direction from the Secretary of State) and so these references should also be omitted from the draft Local Plan as they are not in conformity with the adopted policy position.</u></p>		
The Arch Company Properties LP (Turley obo)	- 2 2	General EC 02 Table 8.1	<p>THE LEWISHAM DRAFT LOCAL PLAN (REGULATION 18, JANUARY 2021) & PROPOSED CHANGES TO THE ADOPTED POLICIES MAP (DECEMBER 2020) WRITTEN REPRESENTATIONS ON BEHALF OF THE ARCH COMPANY PROPERTIES LP</p> <p>We write on behalf of The Arch Company Properties LP (“The Arch Company”) with respect to the Public Consultation on the emerging Lewisham ‘Pre-Publication’ Draft Local Plan (Regulation 18, January 2021) [hereafter: “Draft Local Plan”] and Proposed Changes to the adopted Policies Map (December 2020), specifically with regard to the proposed addition of the Bermondsey Dive Under area to the Surrey Canal Road Strategic Industrial Location (“SIL”).</p>	Noted. Responses to additional representations set out elsewhere in this Consultation Statement.	No change.
The Arch Company Properties LP (Turley obo)	- 2 2	General EC 02 Table 8.1	<p><i>The Arch Company & LB Lewisham Portfolio</i></p> <p>It is considered that it will be helpful to provide some background information on The Arch Company nationally and their portfolio within the borough. The Arch Company acquired Network Rail’s former commercial estate business in 2019. It is the landlord for more than 4,000 businesses across England and Wales, making it the UK’s largest small business landlord, working with thousands of business owners, from car mechanics to bakeries and restaurants, who make a unique and vital contribution to the UK economy.</p> <p>In regard to the potential implications of the emerging Draft Local Plan it is of importance to identify that The Arch Company has substantial land holdings within the borough, specifically in the Bermondsey Dive Under area and the land proposed to be designated as an addition to the Surrey Canal Road SIL in order to release other parts of this designation for redevelopment, namely sites at Evelyn Court, Trundleys Road and the Apollo Business Centre. Being the majority land owner in this area and taking account of the full scale of The Arch Company’s portfolio in the borough (totalling approx. 760,000 sq ft of business and employment space/land including, but not limited to, hundreds of railway arches), the potential implications of the Draft Local Plan are of significant importance.</p> <p><i>LB Lewisham officer note: Annex 1: The Arch Company’s landholdings in and around Bermondsey Dive Under and the wider borough is included in the original representation. The map shows the sites along the railway line.</i></p> <p>The Arch Company’s portfolio includes a large number of railway arches and associated land located to the south of Silwood Street within the Bermondsey Dive Under area. The railways arches and land in question have a lawful use of Classes E(g), B2 and B8 and, for the avoidance of doubt, for the planned leasing</p>	Noted. Responses to additional representations set out elsewhere in this Consultation Statement.	No change.

			<p>of this land our client will shortly be confirming this position via a Certificate of Lawfulness submission.</p> <p>As such, our client has a strong interest in ensuring that the Draft Local Plan creates a strong, flexible and ambitious, but at the same time realistic planning framework in order to facilitate the sustainable growth the borough requires.</p>		
The Arch Company Properties LP (Turley obo)	- 2 2	General EC 02 Table 8.1	<p>Purpose of London’s Strategic Industrial Locations and their typical requirements/attributes</p> <p>For the avoidance of doubt, there are approximately 7,000 hectares of industrial land in London, of which approx. 50 per cent are designated as SIL1. Paragraph 6.5.1 of the London Plan describes SILs as “<i>the capital’s main reservoir of land for industrial, logistics and related uses</i>” which are therefore given strategic protection because they are critical to the operation of the capital’s economy.</p> <p>Policy E4(A) of the London Plan seeks to ensure “[a] <i>sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained, taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution</i>”. Policy E5 further sets out the purpose and preferred uses for SILs (as specified in Policies E4(A) and E5(C) and listed below) as well as its overall purpose which is “<i>to sustain [SILs] as London’s largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London’s economy</i>”.</p> <p>The London Plan also identifies other characteristics which are typical to SILs, in terms of the types of uses and locations summarised in Table 1 below.</p> <p><i>LB Lewisham officer note: Table 1: Typical Characteristics and Requirements for SIL Designations is included in the original representation. The table provides extracts from the London Plan relating to Types of Uses, Location and Logistics Function.</i></p> <p>Relevance for the Draft Local Plan & Recommendation/Suggested Amendments</p> <p>As set out above, the primary purpose of SILs, according to the London Plan, is to ‘support the functioning of London’s economy’ and its role and function can be summarised in the following way:</p> <ul style="list-style-type: none">• Make provision for “<i>industrial-type activities</i>” which includes Use Classes B1b/c (or Class E(g)(ii)/(iii)), B2, B8, waste management, utilities, transport, markets, low-cost industrial and related space for micro, small and medium-sized enterprises and R&D uses;• Activities which “<i>can raise tensions with other land uses, particularly residential development</i>”; and• Support sustainable movement of goods through being located “<i>close to the strategic road network and many are also well-located with respect to rail, river, canals and safeguarded wharves</i>”.	Noted. Responses to additional representations set out elsewhere in this Consultation Statement.	No change.
The Arch Company Properties LP (Turley obo)	- 2 2	General EC 02 Table 8.1	<p>It is further considered that the vision and policies contained in the Draft Local Plan have the potential to meet the Council’s ambitions of delivering good, sustainable growth in the borough during the plan period. Our client and we are more than happy to engage in positive and pro-active discussions with LB Lewisham if this is considered to assist the Council in preparing a sound and</p>	Noted. Responses to additional representations set out elsewhere in this Consultation Statement.	No change.

			<p>deliverable new Local Plan, and to bring forward new development across their portfolio over the coming years.</p> <p>Please do not hesitate to contact Turley should you require any further information or wish to discuss these representations.</p>		
The Arch Company Properties LP (Turley obo)	2 2 -	EC 02 Table 8.1 Proposed Changes to the adopted Policies Map para 5.5	<p><i>Draft Policy EC2 (Protecting employment sites and delivering new workspace), Table 8.1 & Proposed Changes to the adopted Policies Map (December 2020)</i></p> <p>Chapter 8 of the Draft Local Plan sets out the Council’s ambition for a thriving economy and the protection and/or potential of employment and industrial land. To this extent, it is noted that the Council proposes the release of three individual sites (Evelyn Court, Trundleys Road and the Apollo Business Centre) from the overarching Surrey Canal Road SIL for redevelopment to provide a mix or <i>co-location</i> of uses including employment and/or residential. Given the protection of SIL and requirements contained in the London Plan (i.e. Policy E4) for its release and/or substitution, the emerging Local Plan and associated proposed changes to the adopted Policies Map seek to increase the boundary of the SIL to the north-west to include the Bermondsey Dive Under area (see Figure 1) which includes one of our client’s most significant land holdings (i.e. the land to the south of Silwood Street) in the borough (as set out in Figure 2 and Annex 1).</p> <p><i>LB Lewisham officer note: Figure 1: Existing vs. Proposed SIL Boundary is included in the original representation. The maps shows the Bermondsey Dive Under area circled in blue.</i></p> <p><i>LB Lewisham officer note: Figure 2: The Arch Company’s land holdings to the south of Silwood Street is included in the original representation. The map shows an extract from an OS Map.</i></p> <p>It is important to note that The Arch Company is fully aware of (1) the South Bermondsey Dive Under Masterplan (2019) prepared by Lyndon Goode Architects on behalf of Network Rail, LB Southwark and LB Lewisham which represents one of many possible redevelopment scenarios for the area as well as (2) the recently approved mixed use redevelopment of the <i>Land at Silwood Street</i> comprising four blocks with building heights of five to nine storeys providing flexible light industrial/office/retail/cafe/community floorspace (Use Classes B1a/B1c/A1/A3/D1) at ground/first floor levels and 61 residential units on the upper floors (LPA ref. DC/20/116783). This site sits directly adjacent to our client’s land holding and shares a boundary with the main access road to a number of railway arches and the proposed SIL designation (with access to land component running past the frontage of the site).</p> <p>For the avoidance of doubt, our client wishes to clarify that it considers that its land holding at Bermondsey Dive Under, including the railway arches and all associated yard space, can continue to play an important role in providing employment-generating uses in this part of the borough. However, it is not considered that a simple extension of the SIL boundary is <i>justified</i> in this instance (or in accordance with Paragraph 35 of the NPPF) and will therefore not secure the optimum future use of the area.</p>	<p>Disagree. To be compliant with the London Plan, co-location at Evelyn Court, Trundleys Road and the Apollo Business Centre requires that these sites are released from SIL and that compensatory SIL is designated elsewhere. The Bermondsey Dive Under Site has been identified as the only suitable compensatory SIL site in proximity to the Surrey Canal SIL. To recognise the constraints associated with this site, the site allocation has a dual designation, with the majority of the land designated as SIL but the Railway Arches part of the site designated as LSIS. It also limits the types of industrial uses suitable for the site and recognises that residential properties will be built at the adjacent Silwood Street site allocation.</p>	<p>Bermondsey Dive Under site allocation added to the Plan, with a dual designation of SIL and LSIS.</p>

			<p>In fact, neither the <i>Lewisham Local Economic Assessment (December 2018)</i> nor the subsequent <i>Lewisham Employment Land Study (March 2019)</i>, both prepared by CAG Consultants, (or the 2019 Masterplan referred to above) assessed the Bermondsey Dive Under area in relation to its suitability as a potential replacement SIL or considered alternative sites for this purpose. It is therefore neither clear nor justified on what basis this site has been selected to be designated as SIL with relevant changes to the Policies Map and/or as specified in Table 8.1 of the Draft Local Plan therefore considered unsound.</p> <p>The Council’s intention to ‘substitute’ land released from the SIL for alternative uses by including other land within this designation (i.e. in order to ensure that area-wise there is no net loss) is acknowledged. However, it is not considered that the Bermondsey Dive Under area is a suitable SIL replacement site.</p>		
The Arch Company Properties LP (Turley obo)	2 2 -	EC 02 Table 8.1 Proposed Changes to the adopted Policies Map para 5.5	<p>As such, the Council needs to be fully aware that any such designation means that it should make provision for the varied operational requirements of any of the above uses within the area including the railway arches adjacent to the approved mixed use residential development on Silwood Street (LPA ref. DC/20/116783) and its main access road running to the rear of the approved residential uses.</p> <p>At this stage, the evidence base published by the LPA is not considered to be sufficient and/or sound in order to justify the designation of the area as ‘new’ SIL (also see London Plan Policy E5(B)). It is also seen as problematic to grant planning permission for a residential-led development prior to designating the adjacent land as SIL, as proposals “<i>adjacent to SIL should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis</i>” (Policy E5(d)).</p> <p>Reiterating what has been set out above, our client considers that their land holding is well-suited to provide a continued (and lawful) range of employment uses (including ‘softer’ non-SIL uses within the outward facing railway arches which can co-exist with surrounding and emerging residential uses), however, from a planning policy perspective this site should continue to be treated as a Non-Designated Industrial Site or, if robustly justified, as LSIS, as its setting, constraints and surroundings are not deemed suitable to support and/or justify a SIL designation. This will be reflective of the current lawful uses on the site and adjacency to residential properties.</p> <p>It is therefore strongly recommended to amend the Draft Local Plan accordingly (i.e. Table 8.1 and the Proposed Changes to the adopted Policies Map) in order to ensure that it is robustly prepared, justified and sound in relation to this matter – and can therefore be fully supported by our client forming a strong framework for future development in the Bermondsey Dive Under area.</p>	Comments are noted. Our response is set out above.	No change.
The Arch Company Properties LP (Turley obo)	- 2 2	General EC 02 Table 8.1	<p>Conclusion</p> <p>Overall, and as set out above, The Arch Company is supportive of the general direction of the Draft Local Plan and relevant emerging policies contained within it, but strongly disagrees with the addition of their land holding at Bermondsey Dive Under to the Surrey Canal Road SIL and considers that this designation is unjustified and will undermine future development opportunities within the area and/or negatively impact upon surrounding residential uses. Through the granting of planning permission ref. DC/20/116783, the LPA have confirmed that</p>	Comments are noted. Our response is set out above.	No change.

			the character and context of Silwood Street has evolved to be that of a mix of uses and therefore a SIL designation is not deemed appropriate.		
L&Q Group	2	EC 02	<i>Relates to Call for site</i> 4.4 Employment use MELS are earmarked for comprehensive, mixed use development and the Council’s aspiration is to include new modern workspaces in these schemes. L&Q welcomes LBL’s recognition under Policy EC2 that it will need to take a broader view to planning for its future employment floorspace, given the wide range of users and their workspace needs.	Support noted.	No change.
(Avison Young obo)	2	EC 02	<i>Relates to Part 3, LCA SA 25</i> Executive Summary Draft Policy EC2 of the emerging Lewisham Local Plan seeks to protect employment sites and floorspace in line with the employment land hierarchy. Strategic Industrial Locations form the highest tier of the hierarchy, above Locally Significant Industrial Sites, Mixed-use Employment Locations and non-designated employment sites. The proposed policy seeks to identify three SIL sites where the co-location of employment and other compatible uses will be supported. Our client’s site (the proposed development site) is not included in those sites identified. Our client’s site is identified as an employment allocation within Chapter 14 of the draft Local Plan (Lewisham’s Central Area). The site comprises Allocation 25: Randlesdown Road and Bromley Road, detailed on page 555 of the consultation material. The basis of the allocation is to deliver a comprehensive employment-led redevelopment with compatible commercial and ancillary main town centre uses, together with public realm enhancements, including to the Bellingham station approach. We have reviewed the available evidence underpinning the emerging Local Plan. These representations conclude the following: • Draft Policy EC2 has not been prepared in accordance with the tests of soundness set out in the National Planning Policy Framework (2019) (Paragraph 36). In our view the policy is not justified and is not based on proportionate evidence. Further, the Employment Land Review demonstrates that the preparation of the policy hasn’t taken account of the reasonable alternatives nor does it make any viable conclusions on the clients site. This should be reviewed and the policy wording updated to reflect the recommendations of these representations i.e. that the policy should include be drafted to ensure that all SIL sites, or at least the clients part of the Bromley Road SIL, can accommodation the colocation of residential uses In addition to the above, we understand the site has been allocated (Allocation 25, page 555) for employment-led development. The principles of redevelopment for solely industrial and commercial uses has been tested at appeal and (APP/C5690/A/13/2192356 and APP/C5690/A/14/2223342). In both appeal cases, this was considered to be an unviable development option for the site. Supporting uses will be required to support the redevelopment of the site for industrial and commercial uses, and subsequently enhance the quality of the existing stock within the Bromley Road SIL. • We have demonstrated through these representations that the site presents a suitable, achievable and available development opportunities for the re-provision	<p>Noted. The land referred in the response in located within London Plan designated Strategic Industrial Land (at Bromley Road SIL). The London Plan makes clear that SIL should be safeguarded. It sets parameters for the co-location of uses on SIL, and that this must be progressed through the plan-led process. Where SIL land is proposed to be rationalised to enable co-location, substitute industrial capacity for SIL must designated elsewhere in the Borough. Officers do not consider that there is land elsewhere in the Borough that could feasibly provide for replacement capacity, should this site be de-designated from SIL. It is noted that the representation does not put forth any suggested sites which could be considered for substitute SIL.</p> <p>Whilst the draft Local Plan makes proposals for new SIL to be designated at the Bermondsey Dive Under, this is required to provide substitute capacity for SIL land to be reconfigured at Trundleys Road, Apollo Business Centre and Evelyn Court.</p>	Land at Randlesdown Road and Bromley Road site allocation has been removed from the Plan.

			<p>of commercial uses, ensuring no loss and instead, an increase in employment opportunities, underpinned by the delivery of residential development. The co-location of these uses is supported by both the London Plan (2021) and NPPF (2019).</p> <ul style="list-style-type: none"> • On the basis of our conclusions drawn in relation to Draft Policy EC2, we require the policy wording associated with the site’s allocation (Allocation 25) to be updated to include references to the co-location of residential uses and the inclusion of a realistic indicative residential capacity. <p>These representations provide further details on the matters raised above.</p>	<p>The Council acknowledges the aspirations for the site, and that a future development could potentially deliver net gains in industrial capacity along with residential uses. However, this would not be sufficient to satisfy the London Plan requirements. As the site allocation (which was proposed for solely non-residential uses) is considered to be undeliverable by the landowner, it will be removed from the Local Plan.</p>	
(Avison Young obo)	2	EC 02	<p><i>Relates to Part 3, LCA SA 25</i> <i>Policy EC2: Protecting Employment Sites and Delivering New Workspace</i></p> <p>We have assessed the evidence base underpinning Draft Policy EC2, namely the Employment Land Study (March 2019) and specifically the assessment criteria for identifying SIL for intensification and co-location of alternative uses such as residential, and the recommendations for employment site assessment summaries (Table 5.1). We are of the view that the assessment results, the recommendations and the requirements for industrial land are inconsistent.</p> <p>Para. 5.33 concludes that “<i>the size of the site allows for a masterplan approach to take place to allow intensification through a carefully planning mixed use development safeguarding this area for employment</i>”, whereas the recommendation for C9 – Bromley Road is that it is “<i>safeguarded for employment uses & intensify where possible</i>”.</p> <p>The conclusions within the Council’s Employment Land Review for safeguarding employment sites, including mixed-uses and co-locating uses through a masterplan process are therefore inconsistently applied within the Policy EC2.</p>	<p>Noted. The Employment Land Study is an evidence base document which has informed the Local Plan. Table 5.1 of the study summarises the report recommendations for industrial land management, which for Bromley Road SIL (Cluster C9 in the study) it states: “safeguard for employment uses”.</p>	No change.
(Avison Young obo)	2	EC 02	<p><i>Relates to Part 3, LCA SA 25</i></p> <p>The Site Allocations background paper (January 2021) explains that site allocations were identified through 6 criteria;</p> <ol style="list-style-type: none"> 1. The London-wide Strategic Housing Land Availability Assessment (SHLAA) 2. Lewisham ‘Call for Sites’ 3. Existing site allocations 4. Development pipeline 5. Evidence base (including the Employment Land Study (2019) 6. Officer review <p>The Council appear to have nominated the site following an officer review and have disregarded three representations for mixed-use development on the basis that the site is ‘safeguarded employment land’. As noted, the Employment Land</p>	<p>The land is identified as Strategic Industrial Land and is therefore inappropriate for mixed-use development in accordance with London Plan policies.</p>	<p>Land at Randlesdown Road and Bromley Road site allocation has been removed from the Plan.</p>

			<p>Review itself is inconsistent in its conclusions for the site, and it does not reflect the viability of an employment only intensification – as previous established through earlier appeals.</p> <p>Ultimately, this represents an inconsistent approach to identifying sites for co-location as applied by Lewisham and as a result draft Policy EC2 is not appropriately justified and based on proportionate evidence. The proposed policy does not consider reasonable alternatives, as required by Paragraph 35 (b) of the NPPF.</p> <p>In addition, by requiring there to be no net loss of floorspace and operational yard space, and the references to a 65% plot ratio, the principle of EC2 is inconsistent with the wording of London Plan Policy E7 which suggests that selected part of SIL could be intensified to provide additional industrial capacity, and that this would facilitate the consolidation of SIL to support the delivery of residential and other uses. On this basis, we are of the view that the proposed policy EC2 is not consistent with national policy with regard to enabling the delivery of sustainable development and is therefore unsound.</p> <p>The preparation of this policy should therefore be reviewed in line with the tests for soundness set out at Paragraph 35 of the NPPF. This should be reflected in the next iteration of the Local Plan, to which we reserve the right to make further comment.</p>		
(Avison Young obo)	2	EC 02	<p><i>Relates to Part 3, LCA SA 25</i></p> <p>Summary</p> <p>We have reviewed the Borough of Lewisham’s Regulation 18 consultation material, including the Main Issues and Preferred Approach document. We have concluded that there are inconsistencies within the conclusions of the Employment Land Study. On this basis, we are of the opinion that the Policy EC2 is not justified, inasmuch that it is not based on proportionate evidence and does not take into account the reasonable alternatives, in line with the tests sets out in the NPPF at Paragraph 35 for preparing new Local Plans.</p> <p>In addition it is not consistent with national and strategic planning policy and does not enable the delivery of sustainable development in accordance with the policies in the Framework. On this basis we are of the view that the Plan and specifically draft Policy EC2 cannot in its present form be found sound.</p> <p>In addition, we would recommend that the draft wording is amended to specify alternative uses, including those relating to the provision of residential development, in line with Policy E7 of the London Plan which identifies such residential uses as being appropriate uses within a intensified and consolidated SIL. As presently worded, the Site Allocation and Policy EC2 are inconsistent with strategic policy.</p> <p>We have recommend that the policy wording be updated to provide flexibility to support the colocation of compatible uses within this part of the Bromley Road SIL, including where the proposals would not result in an increase in employment opportunities; where the proposals would provide betterment to the overall public realm; and assist in regenerating a site which contributes poorly to the</p>	<p>Noted. The Employment Land Study is an evidence base document which has informed the Local Plan. Table 5.1 of the study summarises the report recommendations for industrial land management, which for Bromley Road SIL (Cluster C9 in the study) it states: “safeguard for employment uses”.</p> <p>The land is identified as Strategic Industrial Land and is therefore inappropriate for mixed-use development in accordance with London Plan policies.</p>	No change.

			local area. We are not seeking the co-location of residential uses on parts of the SIL that are outside of our client’s ownership.		
Yorkshire & Clydesdale Bank Trustees Ltd c/o CBRE Global Investors (Montagu-Evans obo)	2	EC 02	<p><i>Relates to Call for site</i></p> <p>Policy EC2: Protecting Employment Sites and Delivering New Workspace</p> <p>Draft Policy EC2 sets out the Council’s strategic policy on employment land. It identifies a need for 21,800 sqm of net additional employment floorspace (Class B1) up to 2038, which will be focused in Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS), through retaining industrial capacity by ensuring no net loss of floorspace and operational yard space. We note that the Council should ensure all references to land uses are consistent with the changes to the Use Class Order that came into effect on 1 September 2020. This is necessary to ensure its land use policies can be easily interpreted. This is relevant to the Plan as a whole.</p>	Noted. The Local Plan will be amended to reflect and respond to these changes.	Local Plan Part 2 Economy and Culture section amended throughout to reflect and in response to changes to the Use Classes Order, including the new Class E.
Yorkshire & Clydesdale Bank Trustees Ltd c/o CBRE Global Investors (Montagu-Evans obo)	2 2 3 5	EC 02 Table 8.1 Figure 15.2	<p><i>Relates to Call for site</i></p> <p>Table 8.1 accompanies Policy EC2 and sets out Lewisham’s Employment Land Hierarchy. It identifies Evelyn Street as LSIS (which replaces its current LEL designation). We support the change in terminology for consistency with the London Plan. However, we note that Figure 15.2 of the Draft Plan is inconsistent with Table 8.1 and Schedule 4 as it wrongly identifies the Site as SIL. This should be addressed by the Council at Regulation 19 stage to ensure the Site is not inadvertently designated as SIL.</p>	Support noted. Mapping error noted and Figure 15.2 will be amended for accuracy.	Local Plan amended so that Figure 15.2 designates the site as LSIS (and not SIL).
Notting Hill Genesis (Savills obo)	2 2 2	EC 02 Table 8.1 Figure 8.1	<p><i>Relates to Call for site</i></p> <p><i>Commercial and Mixed Use Redevelopment</i></p> <p>It is acknowledged that under the adopted Local Plan, the site is currently designated as a Local Employment Location (LEL) which seeks to protect B Use Class Employment Uses.</p> <p>Table 8.1 (Lewisham’s Employment Land Hierarchy) and corresponding Figure 8.1 of the draft Local Plan proposes to designate Malham Road Industrial Estate as a Locally Significant Industrial Site (LSIS), which is protected for commercial and industrial uses, with priority given to B1 commercial and light industrial uses.</p> <p>As part of the reform to the Town and Country Planning (Use Classes) (England) Regulations (as amended) (“the Use Classes Order”), from 1 September 2020, the former Use Class B1 now falls into the new Use Class E (Commercial Business and Service) which covers a broad range of uses, including: retail, restaurant, office, financial/professional services, indoor sports, medical, gym and nursery uses along with any other services which it is appropriate to provide in commercial, business or service locality. As such, subject to no previous restrictions such as planning conditions, any former B1 units located at Malham Road Industrial Estate could change between any of the uses described within the Use Class E i.e. the change no longer constitutes development and as such, no longer requires planning permission. The draft Local Plan must take into account this new legislation, and the government’s intent to adopt more flexible commercial uses.</p>	Noted. The Local Plan will be amended to reflect and respond to these changes in planning legislation.	Local Plan Part 2 Economy and Culture section amended throughout to reflect and in response to changes to the Use Classes Order, including the new Class E.
Notting Hill Genesis (Savills obo)	2	EC 02	<p><i>Relates to Call for site</i></p> <p>We also note that draft Local Plan Policy EC2 (Protecting employment sites and delivering new workspace) sets out that the Council will ensure that there is no net loss of floorspace or operational yard space within LSIS. Whilst this approach was previously reflected in the Intend to Publish London Plan, this was rejected by the Secretary of State (SoS). In the SoS’s letter to the Mayor of London (dated</p>	Noted. The London Plan provides that Local Plans can include provisions to retain SIL, LSIS and other industrial sites / capacity, taking into account local	Local Plan amended to provide new definition of industrial capacity and removal of 65% plot ratio.

			<p>13 March 2020), the SoS stated this approach was not realistic and was inconsistent with the National Planning Policy Framework, which requires that sufficient land of the right type is available in the right places and at the right time to support growth and innovation and was an over-restrictive stance to hinder Boroughs’ abilities to choose more optimal uses for industrial sites where housing is in high demand.</p> <p>We therefore consider that the Council’s current approach to ‘no net loss’ on existing industrial land set out in Policy EC5 and EC2 is not consistent with national policy and not consistent with the London Plan. It could also have the effect of unnecessarily constraining development and would therefore not be effective in its delivery. As such, we request that any policy references relating to “no net loss of industrial capacity” are deleted. This would ensure that the draft Local Plan is consistent with the London Plan and national policy.</p>	<p>evidence. The Employment Land Study makes clear that Lewisham has experienced a significant loss of capacity and recommends that remaining capacity be retained in order to help meet identified needs over the plan period. The no net loss principle is therefore considered to be justified and in conformity with the London Plan.</p> <p>However it is acknowledged that the draft Local Plan definition of industrial capacity should be amended for conformity with the London Plan.</p>	
Barratt London and the Church Commissioners (Avison Young obo)	2	EC 02	<p><i>Relates to Part 3, LCA SA 20</i></p> <p>Chapter 8 Economy and Culture</p> <p>Draft Policy EC2 Protecting employment sites and delivering new workspace and Draft Policy EC7 Non-designated employment sites</p> <p>We request clarification within the wording of Draft Policy EC2 and EC7 that non-designated employment sites are limited to smaller commercial and industrial sites, i.e. those in Class E(g) (formally B1), B2, and B8 uses, and would not include major redevelopment sites within town centres and/or sites in retail use.</p>	<p>Noted. Disagree with the suggested change. The draft Local Plan broadly seeks to protect industrial capacity, including on non-designated employment sites, irrespective of its location. The approach is informed by the evidence base, including the Employment Land Study and monitoring. In light of the comment, the plan will be amended to provide more clarity as to what constitutes a non-designated site.</p>	<p>Local Plan amended to make clear the definition of non-designated employment land.</p>
SEGRO (CBRE Limited obo)	2	EC 02	<p><i>Relates to Part 3, LNA SA 04</i></p> <p>Executive Summary</p> <p>It is important that the draft plan recognises and plans for the continued growth of the industrial and logistics sector, and the structural shift in society to e-commerce which has only been accelerated by the Covid-19 pandemic. SEGRO therefore welcomes the continued identification of Deptford Trading Estate as a designated Strategic Industrial Location (hereafter “SIL”), and the direction of travel within the plan which seeks to protect and intensify employment uses in these locations.</p>	<p>Support noted.</p>	<p>No change.</p>
SEGRO (CBRE Limited obo)	2	EC 02	<p><i>Relates to Part 3, LNA SA 04</i></p>	<p>Comments are noted. The Plan seeks to provide a balance between providing</p>	<p>No change.</p>

			<ul style="list-style-type: none"> •Draft policies should allow new industrial capacity to come forward within and beyond designated employment sites to ensure the plan is sufficiently flexible to react to changes in industrial demand throughout the plan period. •Mixed use site allocations near to SILs should explicitly reference the SIL as a constraint to future development to ensure the future of this essential employment land supply is not jeopardised. As a minimum, the allocations should reference that no residential development will be approved that will prevent the ability for the SIL to operate on a 24/7 basis. •The assessment of the Blackhorse Road SIL (which includes Deptford Trading Estate) as a site which “cannot be expanded” in the evidence base is not qualified. Although SEGRO are not actively promoting intensification at this time, we suspect this will be feasible subject to detailed matters including highways and design. 	sufficient employment land to meet needs whilst protecting local amenity by directing storage and warehouse uses to designated employment sites. The Local Plan also allows co-location in a select number of locations, as part of a strategy to intensify employment uses on these sites, in line with the London Plan. Relevant site allocations also note that development must not compromise the function of SIL and LSIS and/or reference the ability to function on a 24 hour basis.	
SEGRO (CBRE Limited obo)	2	EC 02	<p><i>Relates to Part 3, LNA SA 04</i></p> <p>Response to the Consultation: On behalf of SEGRO, CBRE Limited has reviewed the content and evidence base to the LB Lewisham Local Plan. Our key observations and comments are summarised below.</p> <p>1. Plot Ratios Whilst we welcome LB Lewisham’s objective to protect existing industrial capacity across the borough, we do not support the requirement for new industrial development to achieve a 65% plot ratio. This policy has been removed from the London Plan (2021) following a direction from the Secretary of State because it was not considered to be an effective tool for managing industrial capacity. SEGRO provided extensive evidence to the London Plan examination on this point, demonstrating that a 65% plot ratio does not provide adequate yard space for many of its customers, who on average operate their businesses most efficiently at plot ratio of 40-50%.</p> <p><i>LB Lewisham officer note: Appendix 1: Plot Ratios Evidence is included in the original representation.</i></p> <p>To ensure general conformity with the London Plan, all references to the 65% plot ratio should be removed from the draft plan.</p>	Noted.	Local Plan amended to provide new definition of industrial capacity and removal of 65% plot ratio.
SEGRO (CBRE Limited obo)	2	EC 02	<p><i>Relates to Part 3, LNA SA 04</i></p> <p>3. Industrial Land Supply</p> <p>The Lewisham Employment Land Study (2019) acknowledges that there has been a net loss of industrial land capacity in recent years, and further loss is expected as a result of development proposals in the pipeline - the cumulative loss of industrial supply expected across the plan period (between 2018 and 2018) is 12.4ha. This is very concerning for SEGRO when coupled with very low vacancy</p>	Noted. The Local Plan seeks to provide a balance between protecting employment land to support the function of the wider London economy, whilst also seeking to meet identified needs for employment floorspace,	Local Plan Part 2 Economy and Culture policies amended to set out stronger support for storage and warehousing uses within SIL to support London’s economy, along with providing more flexibility

			<p>rates of 3% across the borough, which is widely accepted to reflect an inefficient and unhealthy real estate market.</p> <p>The plan’s strategy for industrial land management is to protect some existing designated industrial sites, release others for ‘co-location’ (mixed use development) and prevent additional supply of logistics outside of employment sites.</p> <p>Whilst we acknowledge that co-location can maintain existing levels of industrial capacity if appropriately designed, it does constrain the ability of established industrial locations to intensify their activities to respond to increases in demand, which will result from an increased population and greater pressure on the ‘last mile’ of the supply chain. This, together with a policy that prevents new logistics opportunities coming forward outside of designated industrial sites, will prevent the creation of additional supply now and in the future. We believe this is needed to reserve the impact of recent losses and allow vacancy rates to increase to a healthier level.</p> <p>On this basis, we question whether the proposed strategy of only protecting some industrial land and allowing the rest to be developed for a mix of commercial and residential uses is justified and achieves the objectives of the NPPF to deliver ‘sustainable development’. We recommend two solutions for the plan to better address current and future industrial need:</p> <ol style="list-style-type: none"> 1. Part B(d) of Policy EC2, which states that proposals consist solely or predominantly of storage and warehousing uses outside of SIL should be resisted the redevelopment, should be removed; and 2. Proposals for new sensitive uses, such as residential, near to SILs should be very carefully managed and designed to ensure that existing uses in SILs and their ability to intensify and operate on a 24/7 basis are not compromised – see next section of these representations for further discussion. 	<p>which in Lewisham are primarily for Class E(g) business uses, as set out in the Employment Land Study. Accordingly, the draft Local Plan sets out a strong position to safeguard existing industrial capacity, whilst also enabling the co-location of employment and other uses in a select number of locations, as part of a strategy to intensify employment uses on these sites, in line with the London Plan.</p> <p>However, it is recognised that the plan could better address the need to support London’s wider economy including the CAZ, such as for logistics and last-mile delivery. The plan will therefore be amended to provide more flexibility for storage and warehousing, whilst continuing to seek to carefully manage these uses, recognising they are not the principal identified local needs as far as employment provision is concerned.</p>	<p>for these uses in LSIS and non-designated employment areas.</p> <p>Local Plan amended with additional requirements on amenity, specifically in relation to protecting the function and effectiveness of SIL and LSIS, and SIL on a 24-hour basis. This will work together with Amenity and Agent of Change policy.</p>
Cockpit Arts (The Planning Lab obo)	2	EC 02	<p><i>Relates to Part 3, LNA SA 14</i></p> <ul style="list-style-type: none"> • CA is supportive of policies that seek to protect important employment locations, including those designated as MELs. • We query how LB Lewisham plans to ensure the mixed-use development permitted in MELs achieves an appropriate balance between employment and other uses? Will this be achieved via specific quotas, and how will this be monitored/enforced? It will be important that this balance includes retention/provision of specific maker space (i.e. dirty/messy/noisy light industrial creative space) which has different requirements from digitally-driven creative businesses, or other artist workspace. • CA is supportive of other policies in the Plan that require MELs to be progressed according to masterplans to ensure the responsibility of providing employment floorspace is approached pragmatically between owners/developers within the MEL. 	Support noted. The draft Local Plan does not prioritise residential uses above other land uses in MELs. The Local Plan also requires a balanced approach through the use of masterplans to demonstrate an appropriate mix of uses on sites. Draft Policy EC6.C sets out new approaches to protecting new employment capacity	No change.

			<ul style="list-style-type: none"> • We would advocate that demands for other competing priority uses (e.g. residential) are not prioritised in these areas, over employment floorspace. 	delivered on MELs through the masterplan process. The Council will monitor the implementation and effectiveness of policies through the Authority Monitoring Report process.	
Artworks Creekside (Avison Young obo)	2	EC 02	<p><i>Relates to Part 3, LNA SA 16</i></p> <p>Draft Policy EC2 – Protecting employment sites and delivering new workspace</p> <p>Draft Policy EC2 seeks to safeguard land for commercial and industrial uses through retaining employment capacity within Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS). We note that Lower Creekside is identified as a LSIS which are identified in Table 8.1 as providing for the borough’s <i>‘main local concentrations of commercial and industrial uses, which perform a niche role to support the functioning of the sub-regional and local economy. They provide workspace for micro, small and medium sized businesses, including the cultural, creative and digital industries. Protected for commercial and industrial uses, with priority given to Class B1 commercial and light industrial uses.’</i></p> <p>Whilst forecast need has been identified for 21,800 sqm of net additional employment floorspace, it is noted that this refers to previous Use Class B1. This has since been replaced by Use Class E(g) (Use Classes Order 1987 as amended in September 2020) and draft Policy EC2 and the supporting text should be updated to reflect the latest use classes.</p>	Noted. The Local Plan will be amended to reflect and respond to these changes in planning legislation.	Local Plan Part 2 Economy and Culture section amended throughout to reflect and in response to changes to the Use Classes Order, including the new Class E.
Artworks Creekside (Avison Young obo)	2	EC 02	<p>Part B(a) of draft Policy EC2 states that within SIL and LSIS locations industrial capacity should be retained <i>‘ensuring no net loss of floorspace and operational yard space along with intensifying employment development, including by facilitating the co-location of employment and other compatible uses through the plan-led process’</i>. The supporting explanatory text advises that safeguarding of employment land includes <i>‘floorspace, yard space for operations and servicing space’</i>.</p> <p>The principle of intensifying employment sites and the ability to co-locate employment uses alongside other uses is supported and London Plan Policy E7 supports efficient use of employment land through delivering higher plot ratios, whilst having regard to operational requirements (including servicing). London Plan Policy E7 is clear insofar as it required intensification to provide additional capacity.</p> <p>However, the principle of ‘no net loss’ and the 65% plot ratio was omitted from the adopted London Plan and there is no requirement for LSIS locations to consider the loss of floorspace and operational yardspace. If applied to 2 Creekside, the requirement to protect all operational yard space would be overly restrictive and would not allow successful intensification of designated employment sites and the opportunities for co-location that the wider employment Policies seek to achieve.</p>	<p>Noted. The London Plan provides that Local Plans can include provisions to retain SIL, LSIS and other industrial sites / capacity, taking into account local evidence. The Employment Land Study makes clear that Lewisham has experienced a significant loss of capacity and recommends that remaining capacity be retained in order to help meet identified needs over the plan period. The no net loss principle is therefore considered to be justified and in conformity with the London Plan.</p> <p>However it is acknowledged that the draft Local Plan definition of industrial capacity should be amended for</p>	Local Plan amended to provide new definition of industrial capacity and removal of 65% plot ratio.

				conformity with the London Plan.	
Big Yellow Storage Company Limited (DWD obo)	2	EC 02	<p>Policy EC2 (Protecting employment sites and delivering new workspace)</p> <p>Big Yellow supports part A of this policy, which seeks to safeguard employment sites and floorspace for commercial and industrial uses. However, Big Yellow strongly objects to part Ad of this draft policy, which states:</p> <p><i>“Outside of SIL, resisting the redevelopment of employment land and sites where proposals consist solely or predominantly of storage and warehousing uses.”</i></p> <p>Part D would therefore apply to the redevelopment of sites located anywhere other than in Strategic Industrial Locations (SILs), including LSISs and non-designated employment sites. No explanation is provided for this approach. More importantly, Part Ad would apply to the redevelopment of existing storage and warehousing uses located in LSISs or on non-designated employment sites.</p> <p>Storage and warehouse uses are universally accepted as key industrial land uses that make a significant contribution to the function of both Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs) across London boroughs.</p> <p>Part Ad would prevent existing self-storage facilities from being redeveloped and intensified, if they are located within LSISs or on non-designated employment sites, unless the redevelopment proposal involves a greater proportion of other employment uses. This is an unreasonably onerous approach and likely to result in the loss of industrial floorspace when there could be opportunities to secure intensification of these sites for both self-storage (an industrial use) and other employment uses.</p> <p>The Site is located within an LEL and the existing self-storage facility performs well. If Big Yellow sought to redevelop and intensify the Site, Part Ad places a restriction that would likely mean redevelopment would be unviable.</p> <p>Therefore, we request that greater flexibility is provided in the wording of Part Ad and suggest that it is amended to read as follows:</p> <p><i>“Outside of SIL, resisting the redevelopment of employment land and sites where proposals consist solely or predominantly of storage and warehousing uses, unless:</i></p> <ul style="list-style-type: none"><i>• Sites are presently in sole or predominantly of storage and warehousing use;</i><i>and</i><i>• Redevelopment proposals comprise intensification of storage and warehousing floorspace; and</i><i>• The introduction of other employment uses.”</i> <p>These amendments provide flexibility for existing self-storage facilities to redevelop their sites to re-provide self-storage floorspace, providing the floor area is intensified and other employment uses are integrated.</p>	Noted.	Local Plan amended to provide greater flexibility for development proposals in existing storage and distribution use, as recommended.
The Renewal Group (Carney Sweeney obo)	2	EC 02	<p><i>Relates to Part 3, LNA SA 08</i></p> <p>Policy EC2 Protecting Employment Sites and Delivering New Workspace</p> <p>This policy should be updated to reflect the amendments to the London Plan prior to its final adoption and publication. The policy also needs to be updated to take into account new Use Class E and the imminent amended permitted</p>	Noted.	Local Plan reviewed throughout to reflect changes to and ensure conformity with the London Plan (2021).

			development rights later this year. The Inspector considering the Westminster Local Plan in 2020 made clear the importance of this.		
(Avison Young obo)	2 -	Chapter 8 EC 02	<p>Chapter 8 identifies the main issues relating to the Lewisham’s economy and culture, including: making the best uses of land and striking the right balance between the delivery of homes and space for business; the role of out-of-centre retail parks; inclusive economy; affordable workspace; design quality; and responding to the challenge facing the high street.</p> <p>Draft Policy EC2 provides support for the protection of commercial and industrial uses within the Borough. Point A notes that proposals for new development should be commensurate with the type and function of land sites within the hierarchy detailed in Table 8.1 (and replicated below).</p> <p>Point B confirms the level of net additional employment floorspace with Class B1 required within the Plan period (21,800 sqm) and how this will be met. Point Ba. confirms the approach to delivery will be focused on ensuring no net loss of floorspace and operational floor space within Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSIS). This is plainly now out of date as a result of the direction from the Secretary of State and the removal of the ‘no net loss’ principle and the reference to plot ratios from the adopted London Plan (2021).</p> <p>Furthermore, the intensification of these sites including the co-location of other employment and compatible uses will only be supported on identified sites (as per those listed in Point D).</p> <p>Point C of the draft policy wording confirms that development proposals on sites within SILs must not adversely impact on the function and integrity of the SIL or prejudice the continued operations of existing uses.</p> <p>Point D confirms three sites where the co-location of other compatible uses will be supported, including: Apollo Business Centre (Surrey Canal Road SIL); Trundleys Road (Surrey Canal Road SIL); and Evelyn Court (Surrey Canal Road SIL). Our clients site is not included within the policy wording for the co-location of compatible uses.</p> <p><i>LB Lewisham officer note: Figure 2: Lewisham’s Employment Hierarchy is included in the original representation. It provides details relating to SIL, LSIS, MEL, and Non-designated employment sites.</i></p>	Disagree that the plan is out of date. Co-location can only take place where SIL is released and compensatory provision of SIL is designated elsewhere. Bromley Road SIL is not included in point D as it has no compensatory SIL sites.	No change.
	2	EC 02	<p><i>Relates to Part 2, LNA SA 06</i></p> <p>Site context and background</p> <p>The site is located at 164-196 Trundleys Road and 1-9 Sanford Street, Deptford SE8 5JE. The site lies southwest of Deptford Park, adjacent to Folkestone Gardens and extends to approximately 0.38 ha. The site is bound by Trundley’s Road to the east, Sanford Street to the south, railway lines and a TfL operations building (substation) to the west and Juno Way to the north. The site benefits from a long frontage to Folkestone Gardens.</p>	<p>Noted. An additional row in Table 8.1 is not necessary.</p> <p>Table 8.1 has been amended to show that Trundleys Road is designated as LSIS.</p> <p>Schedule 4 also recognises that Trundleys Road has been de-designated from</p>	The Local Plan now reflects the approved planning application for Trundleys Road

			<p>A planning application was submitted for the Site for an employment-led scheme with residential above for 189 units in May 2018 and is pending determination by LBL (ref DC/18/106941). A second application was also submitted in August 2020 for an employment-led scheme with residential and student accommodation above and is also pending determination by LBL (ref 20/117886).</p> <p>Uses will only be supported at selected SIL sites, and where it can be suitably demonstrated that the requirements of draft London Plan policies E5 and E7 and other Local Plan policies, are satisfied. This includes the Trundley’s Road site currently within Surrey Canal SIL, which is proposed to be de-designated from SIL (as discussed further below).</p> <p>On the basis that the Trundley’s Road site is to be de-designated from SIL, Policy EC2 should clarify that the Trundley’s Road site no longer forms part of the Surrey Canal Road SIL. For clarify, an additional row could be included in Table 8.1 specifically for such co-location sites.</p>	<p>SIL and re-designated as LSIS.</p> <p>The Surrey Canal Road and Trundleys Road site allocation also mentions that it is a re-designated LSIS site.</p>	
Tetra Tech Planning (John Lyon’s Charity obo)	2	EC 02	Economy & Culture Do you agree that the Local Plan has identified all of the issues around economy and culture? We consider that Policies EC2, Table 8.1 and EC3 should include a reference to Site Allocations within the Employment Land Hierarchy.	Noted. The Local Plan should be read as a whole.	No change.
	2	EC 03			
	2	Table 8.1			
Fifth State and (Avison Young obo)	2	EC 03	<p><i>Relates to Part 3, LNA SA 16</i></p> <p><i>Draft Policy EC3 – Location and design of new workspace</i></p> <p>The Owners and Developer of 5-9 Creekside strongly support draft Policy EC3 which outlines a number of criteria to promote the delivery of high quality, flexible and suitable workspaces for micro, small and medium-sized businesses.</p>	Support noted.	No change.
L&Q Group	2	EC 03	<p><i>Relates to Call for site</i></p> <p>Policy EC3 (C), includes several provisions that new employment development should consider. L&Q disagree that commercial fit out to shell and core only is not appropriate. Rather, we consider providing units to shell and core enables us to attract the greatest number of potential occupiers and provide flexibility in the type of workspace that can be delivered on site, especially given the new wider E use class. Moreover, full internal fit out will add considerably to build costs and we consider this should not be prioritised over other benefits, such as affordable housing. We work closely with local agents through the design process to establish the type of users that would be attracted to the location and consider this as part of our overall strategy for the site, including implications for local amenity, servicing requirements and interplay with the public realm. L&Q note the LBL’s preference for employment locations to include a range of premises available, in terms of both type and size but also an appropriate range of rents.</p>	Noted. It is accepted that the policy could be amended to require that development proposals provide an appropriate level of fit out (rather than full fit out) and will be considered on a case-by-case basis. However retaining position that shell and core only is unacceptable in principle.	Policy amended to require that development proposals provide an appropriate level of fit out, to be assessed on a case-by-case basis.
GHL (Leegate) Limited (Frank Knight obo)	2	EC 03	<p><i>Relates to Part 3, LEA SA 03</i></p> <p>3. Economy and Culture</p> <p>The Council has set out to ensure that the Local Plan continues to support the success and future growth ambitions of Lewisham. Policy EC3 (Location and design of new workspace) states new employment development will be directed to sites in Lewisham’s employment land hierarchy.</p>	Noted.	No change.
Artworks Creekside	2	EC 03	<p><i>Relates to Part 3, LNA SA 16</i></p> <p><i>Draft Policy EC3 – Location and design of new workspace</i></p>	Support noted.	No change.

(Avison Young obo)			As demonstrated to the Council through our emerging development proposals, we are seeking to create high quality, flexible and suitable workspaces for micro, small and medium-sized businesses. We therefore support Policy EC3.		
QUOD (Landsec obo - Lewisham Shopping Centre)	2	EC 03	Workspace	Disagree. The Local Plan Viability Assessment has tested the viability of the requirements around affordable workspace. On the basis of this evidence, the requirement is considered to be viable and justified.	Local Plan amended to provide further information on how affordable workspace requirements will be implemented.
	2	EC 04	11.4 Landsec generally support draft workspace policies EC3 ‘Location and design of new workspace’ and EC4 ‘Providing suitable business space and affordable workspace’, albeit would like to work with the Council to better understand the justification for the provision of 10% of proposed employment floorspace comprising affordable workspace (EC4E).		
	2	EC 09	<p>11.5 The narrative to this policy requires further justification for the 10% requirement. The Lewisham’s Employment Land Study (2019) and Local Economic Assessment (2019) does not justify the policy. This approach conflicts with London Plan Policy E3 ‘Affordable workspace’ which requires that <i>“Boroughs, in their Development Plans, ... consider detailed affordable workspace policies in light of local evidence of need and viability.”</i> Policy EC4 E should be viability tested.</p> <p>11.6 Policy EC9 C ‘Workplace training and job opportunities’ requires new development that results in a net loss of employment floorspace to make contributions towards local employment and training initiatives. Town centre regeneration resulting in mixed use development will result in changes in different types of floorspace and the new E class is designed to facilitate that. Rather than having a formulaic approach, the Council could agree bespoke agreements with strategic development in order to ensure that development can maximise the benefits for local people though future employment opportunities.</p>		
Fifth State and (Avison Young obo)	2	EC 04	<p><i>Relates to Part 3, LNA SA 16</i></p> <p><i>Draft Policy EC4 – Providing suitable business space and affordable workspace</i></p> <p>The Owners and Developer of 5-9 Creekside broadly support the principle of the proposed draft Policy wording which seeks major developments to provide at least 10% of new employment floorspace as affordable workspace.</p> <p>Part E of the draft Policy states that further details will be set out in the Council’s Planning Obligations SPD. The supporting text states that <i>‘affordable workspace is workspace that is provided at rents maintained below the market rate. This type of workspace is important to support business start-ups, particularly in the cultural and creative sectors’</i>.</p> <p>As currently drafted there is no confirmation of the specific heads of terms or discount levels which are envisaged to be imposed through the Planning Obligations SPD to secure the provision of affordable workspace. As such a detailed response on the viability of such a requirement cannot be provided, but the principle of such a mechanism is supported. Fifth State request that the proposed affordable workspace discount is specified within this policy so that it can be appropriately viability tested at the plan making stage, as required by the NPPF.</p>	Noted. The Local Plan Viability Assessment has tested the viability of the requirements around affordable workspace. On the basis of this evidence, the requirement is considered to be viable and justified.	Local Plan amended to provide further information on how affordable workspace requirements will be implemented.

			Fifth State reserve the right to make further comment in relation to the specific heads of terms at the appropriate time.		
The Arch Company Properties LP (Turley obo)	2	EC 04	<p><i>Draft Policy EC4 Providing suitable business space and affordable workspace</i></p> <p>Whilst our client is generally supportive of the Council’s objective to secure (suitable and) affordable workspace, it is important to:</p> <p>a) Highlight that the provision of such floorspace will have to be subject to viability testing (especially in designated industrial land within which redevelopment projects already have to deal with significant pressures on viability, particularly in co-location schemes, and therefore affordable workspace may result in a conflict with the provision of affordable housing or other infrastructure). To this extent, it is acknowledged that para. 8.23 of the Draft Local Plan refers to a viability tested route, however, to be clear and transparent this should be recognised in the main policy wording in order for the provision of affordable workspace (on/off-site) to be justified; and</p> <p>b) In relation to railway arches (Part D(d)), the same comments as set out in relation to Draft Policy EC8 above apply where it relates to railway arches.</p>	<p>Noted. The Local Plan Viability Assessment has tested the viability of the requirements around affordable workspace. On the basis of this evidence, the requirement is considered to be viable and justified.</p> <p>The draft Local Plan EC04 supporting text provides that flexibility may be applied where the requirement cannot be met for reasons of viability. This point will be elevated to the policy for clarification.</p>	Local Plan policy EC04 amended to provide clarification around viability considerations for affordable workspace.
L&Q Group	2	EC 04	<p><i>Relates to Call for site</i></p> <p>Notably, Policy EC4 D states that within MEL’s, where there is existing provision of affordable workspace on-site, proposals will be required to retain or re-provide this workspace in any future redevelopment unless it can be demonstrated that the affordable workspace has been provided on a temporary basis (meanwhile use). Whilst L&Q agree that proposals should include premises with an appropriate range of rents, it may not be possible or appropriate in all cases to match the affordable workspace, especially if as part of the comprehensive redevelopment of the site, the premises re-provided are of a substantially better quality. This should be acknowledged by LBL in the supporting text.</p> <p>In addition, L&Q are of the view that subsidised workspaces should be balanced against other requirements for the site, some of which may also be subsidised i.e. quantum of affordable housing. This needs to be considered as part of the feasibility exercise reference at EC 4(e), which should be expanded to include the viability of subsidised workspace as well as feasibility.</p>	<p>The Local Plan Viability Assessment has tested the viability of the requirements around affordable workspace. On the basis of this evidence, the requirement is considered to be viable and justified.</p> <p>The draft Local Plan EC04 supporting text provides that flexibility may be applied where the requirement cannot be met for reasons of viability. This point will be elevated to the policy for clarification.</p>	Local Plan policy EC04 amended to provide clarification around viability considerations for affordable workspace.
L&Q Group	2	EC 04	<p><i>Relates to Call for site</i></p> <p>However, L&Q’s concerns regarding the appropriateness of new and re-provided affordable workspace, both in terms of the finish of units and rent levels, raised above on Policy EC4, apply to this policy.</p>	Noted. Reponses to further detailed representations set out elsewhere in the Consultation Statement.	No change.
Notting Hill Genesis (Savills obo)	2	EC 04	<p><i>Relates to Call for site</i></p> <p>Notwithstanding the above, NHG supports the overall principles of draft Local Plan Policy EC4 (Providing suitable business space and affordable workspace) as it relates to the delivery of new and re-purposed workspace designed to accommodate micro, small and medium sized businesses to complement and support existing clusters of cultural and creative businesses. NHG also support, in principle, the provision of affordable employment floorspace, subject to viability.</p>	Support noted.	No change.

GHIL (Leegate) Limited (Frank Knight obo)	2	EC 04	<p><i>Relates to Part 3, LEA SA 03</i></p> <p>Furthermore, Policy EC4 (Providing suitable business space and affordable workspace) adds that new major commercial development, including major mixed-use development, will be required to provide at least 10% of new employment floorspace as affordable workspace (on site where feasible).</p> <p>GHIL broadly supports the economic development policies set out in Chapter 8 (Economy and Culture) but reminds the Council to ensure the policies are justified and that Policy EC4 has been informed by appropriate evidence which determines why affordable workspace is required on all major mixed-use developments. It is suggested that this policy is informed by relevant evidence base and is tested through a viability route. Policy EC4 will need to be further scrutinised to ensure that any additional costs being placed on development, does not impact upon scheme feasibility and viability.</p>	Noted. The Local Plan Viability Assessment has tested the viability of the requirements around affordable workspace. On the basis of this evidence, the requirement is considered to be viable and justified.	Local Plan policy EC04 amended to provide clarification around viability considerations for affordable workspace
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	2	EC 04	<p><i>Relates to Part 3, LNA SA 14</i></p> <p>Suitable business space and affordable workspace</p> <p>We note the approach of Policy EC4 (Providing suitable business space and affordable workspace) is that major development proposals commercial development proposals should ensure provision is made for suitable types and sizes of units, at an appropriate range of rents, with part E stating that new major commercial development, including major mixed-use development incorporating commercial floorspace will be required to provide at least 10% new employment floorspace as affordable workspace where feasible.</p> <p>Whilst the principle of providing commercial floor space is supported, any provision of affordable workspace must be considered on a case by case basis, having regards to the overall benefits that a major mixed use scheme would deliver to ensure it does not jeopardise the overall effective delivery of a comprehensive mixed use redevelopment site allocation. As such, the drafting should be amended to ensure the provision is considered on a case by case basis, and/or subject to viability. Currently the text makes reference to “where feasible” but this should be updated to “where viable”. Making this change would provide flexibility and it will ensure that the draft Local is effective in its delivery.</p>	Noted. The Local Plan Viability Assessment has tested the viability of the requirements around affordable workspace. On the basis of this evidence, the requirement is considered to be viable and justified.	Local Plan policy EC04 amended to provide clarification around viability considerations for affordable workspace
SEGRO (CBRE Limited obo)	2	EC 04	<p><i>Relates to Part 3, LNA SA 04</i></p> <ul style="list-style-type: none"> • The draft affordable workspace policy needs to be justified by evidence that it is both necessary and viable, and needs to be clearly drafted to provide certainty to developers regarding exactly under what circumstances affordable workspace should be provided; how much should be provided; and on what terms. 	Noted. The Local Plan Viability Assessment has tested the viability of the requirements around affordable workspace. On the basis of this evidence, the requirement is considered to be viable and justified.	Local Plan policy EC04 amended to provide clarification around viability considerations for affordable workspace
SEGRO (CBRE Limited obo)	2	EC 04	<p><i>Relates to Part 3, LNA SA 04</i></p> <p>6. Affordable Workspace</p> <p>We note that the London Plan 2021 (Policies E2 and E3 specifically) provides a policy framework for local affordable workspace policies to come forward where there is an identified need. The examination of the London Plan policy indicated a number of considerations that would be important to testing whether such a</p>	Noted. The Local Plan Viability Assessment has tested the viability of the requirements around affordable workspace. On the basis of this evidence,	Local Plan policy EC04 amended to provide clarification around viability considerations for affordable workspace.

			<p>policy would be sound, including ensuring the policy is sufficiently clear in its requirements and ensuring these requirements are justified by the appropriate evidence.</p> <p>In this context we have the following observations and recommendations for draft policy EC4 (Providing suitable business space and affordable workspace):</p> <ul style="list-style-type: none"> • As a general point, we recommend that an evidence-based assessment of need is undertaken to establish where the market is failing to deliver a certain type of workspace and why such workspace is necessary to be supported in planning terms. This will help the policy to be justified and effective in achieving its objectively assessed needs. •Part A talks about provision being made for ‘suitable types and sizes of units, at an appropriate range of rents’ – the definition of ‘suitable’ and appropriate is not included and so it is not clear what is expected and how a development would be assessed against this policy. We recommend that the Council refers to the inspectors’ comments on Policy E2 of the Draft London Plan which was submitted for examination for a discussion on the soundness of this language and approach. •Part C requires development to retain or re-provide existing provision of low-cost or affordable workspace on-site – as above, we recommend that the Council refers to the inspectors’ comments on Policy E2 of the Draft London Plan. •Part E requires new major commercial development, including major mixed-use development incorporating commercial floorspace, to provide at least 10% of new employment floorspace as affordable workspace. This should be provided on site wherever feasible. Further details will be set out in the Council’s Planning Obligations Supplementary Planning Document. The NPPF requires viability testing to be undertaken at the plan making stage, so we believe it is necessary for the local plan policy to at least set out the expected level of discount below market rent to be specified. •In relation to Part E, we also recommend that this policy is only applied to net additional business floorspace to ensure that investment into existing buildings or replacing them with more sustainable ones is not dis-incentivised. 	<p>the requirement is considered to be viable and justified.</p> <p>The council is also preparing an affordable workspace strategy.</p>	
Cockpit Arts (The Planning Lab obo)	2	EC 04	<p><i>Relates to Part 3, LNA SA 14</i></p> <ul style="list-style-type: none"> • CA endorses policy that requires provision of genuinely affordable workspaces for all creative industries, including independent makers and crafts (not just 'arts'). Again, we reiterate that it is important that these workspaces include specific maker space (i.e. dirty/messy/noisy light industrial creative space) which has different requirements from digitally-driven creative businesses. 	Support noted. The draft Local Plan provides flexibility for a wide range of uses to locate within employment locations, with detailed requirements around amenity to ensure industrial uses are not prejudiced.	No change.
Artworks Creekside (Avison Young obo)	2	EC 04	<p><i>Relates to Part 3, LNA SA 16</i></p> <p><i>Draft Policy EC4 – Providing suitable business space and affordable workspace</i></p> <p>Artworks Creekside, having been involved in affordable workspaces on both sites for a number of years, broadly support the principle of the proposed draft Policy wording which seeks major developments to provide at least 10% of new employment floorspace as affordable workspace.</p>	Noted. The Local Plan Viability Assessment has tested the viability of the requirements around affordable workspace. On the basis of this evidence,	Local Plan policy EC04 amended to provide clarification around viability considerations for affordable workspace

			Part E of the draft Policy states that further details will be set out in the Council's Planning Obligations SPD. Clearly, Artworks Creekside reserve the right to make further comment in relation to the SPD at the appropriate time.	the requirement is considered to be viable and justified.	
Transport for London Commercial Development	2	EC 04	EC4 Providing suitable business space and affordable workspace TfL CD acknowledge the need to provide affordable workspace in the right locations. However, it is considered that criterion a is ambiguous and overlaps with criterion E. It is suggested that criterion A is reviewed to ensure it is not repeating other criteria and that it is clear what is expected of a developer.	Noted. Criterion A sets a general approach for development proposals to consider how provision for SMEs and micro businesses can be delivered. The remainder of the policy sets out details for specific types of workspace.	No change.
The Renewal Group (Carney Sweeney obo)	2	EC 04	<i>Relates to Part 3, LNA SA 08</i> Policy EC4 Providing Suitable Business Space and Affordable Workspace Clarity needs to be provided as to whether 10% of new employment floorspace being provided as affordable workspace is to take priority over the provision of affordable housing in mixed use developments. On many occasions, viability assessments need to be provided to demonstrate the maximum amount of affordable housing and the Council need to be clear as to whether 10% affordable workspace needs to be taken into account in appraisals prior to the assessment of the maximum amount of affordable housing. This is critical as on many development sites viability is constrained.	Noted. The Local Plan Viability Assessment has tested the viability of the requirements around affordable workspace. On the basis of this evidence, the requirement is considered to be viable and justified.	Local Plan policy EC04 amended to provide clarification around viability considerations for affordable workspace
Fifth State and (Avison Young obo)	2	EC 05	<i>Relates to Part 3, LNA SA 16</i> Draft Policy EC5 – Locally Significant Industrial Sites (LSIS) – formerly LEL The Owners and Developer of 5-9 Creekside have already provided commentary to draft Policy EC2 which requests that the principle of no net loss and the 65% plot ratio should be removed from the draft Local Plan, in order to be consistent with the adopted London Plan. Aside from this point, they broadly support the aims of draft Policy EC5 which supports the co-location of employment and other compatible uses at selected LSIS locations (including Lower Creekside). <u>Part E of the draft Policy refers to LSIS listed in Part B; this should be corrected to Part C which provides the list of LSIS sites where co-location is supported.</u>	Support noted. Policy cross-reference is an editorial error that will be rectified. Responses to representations on plot ratio set out elsewhere in the Consultation Statement.	Local Plan amended to appropriately cross-reference policy requirements.
Fifth State and (Avison Young obo)	2	EC 05	<i>Relates to Part 3, LNA SA 16</i> Part E states that where proposals come forward on LSIS co-location sites where an approved site-wide masterplan is not in place, Criteria in Parts F and G of the policy will apply. Part F(a) of this policy states that residential uses would not be supported, which conflicts with the proposed Site Allocation 16 (discussed later in this representation) which identifies that residential uses are considered to be compatible and suitable as part of a co-location scheme at Lower Creekside. The explanatory text on page 266 states that proposals for non-employment uses in LSIS would be resisted if a site wide masterplan has not been agreed or approved because the Council want to ' <i>ensure that the employment generating function of LSIS land remains intact and is not eroded by the piecemeal introduction of non-employment uses</i> '. This approach is contrary to the aspirations of the London Plan, which states at Policy E7 that ' <i>Development Plans and development proposals should be proactive and encourage the intensification</i>	Noted. The Council considers that masterplans are necessary to ensure certainty over the delivery of outcomes for LSIS sites where co-location is supported in principle. It is acknowledged that sites with multiple landowners and leaseholders may add complexity to the masterplan process. However, the requirement will ensure that the function of LSIS is not compromised through piecemeal development of	No change.

			<p><i>of business uses, inter alia.</i>’ Further, Part D of Policy E7 sets out the principles for which developments proposing the co-location of uses must consider.</p> <p><u>We are of the view that it is unreasonable to restrict the principle of delivering residential uses within LSIS co-location schemes in the absence of a site wide masterplan being in place.</u> Whilst we are working with adjacent land owners at 2 and 3 Creekside, this imposes a harmful policy control which is contrary to good planning practices. <u>Notwithstanding this, where a number of sites are being brought forward as part of the wider regeneration of an area which include co-locating factors, the requirement for comprehensive masterplanning may be compromised by land ownerships etc. and ultimately delay the delivery of much needed accommodation, both employment and residential for the borough.</u></p> <p><u>As such we request that draft Policy EC5 acknowledges that a masterplan approach will not be necessary where sites have already been identified for co-location by virtue of a Site Allocation, which we consider will satisfy London Plan Policy E7 (as the co-location proposed is being plan-led). As such draft Policy EC5 Part E should be removed.</u></p>	<p>parcels of land within the LSIS, particularly where non-employment uses such as housing are introduced.</p>	
Fifth State and (Avison Young obo)	2	EC 05	<p><u>We consider that the requirement for quality design and placemaking principles are already secured via the relevant draft policies contained in Chapter 5 of the draft Lewisham Local Plan and would therefore request that Part F(a) is removed.</u></p>	<p>Disagree. Part F(a) does not relate specifically to quality of design and place making.</p>	<p>No change.</p>
Fifth State and (Avison Young obo)	2	EC 05	<p>Within the explanatory text on page 266, the draft Local Plan states that schemes which result in a net loss of industrial capacity will only be considered in very exceptional circumstances and goes on to state that <i>‘proposals will be required to provide a minimum of 50 per cent of genuinely affordable housing on the residential element’</i>. Whilst this position is understood and reflects the London Plan position where there is a loss of industrial capacity, <u>we consider it would be helpful to provide further clarity within the policy wording for proposals that would result in no net loss of industrial capacity schemes would be required to provide a minimum of 35% of genuinely affordable housing on the residential element (to qualify for the Fast Track Route in accordance with London Plan Policies H5 and E7).</u></p>	<p>Noted. The policy is relating specifically to proposals involving the loss of industrial capacity. The requirements for affordable housing are set out in Policy HO3. The plan must be read as a whole.</p>	<p>No change.</p>
Yorkshire & Clydesdale Bank Trustees Ltd c/o CBRE Global Investors (Montagu-Evans obo)	2	EC 05	<p><i>Relates to Call for site</i></p> <p>Policy EC5: Protecting Employment Sites and Delivering New Workspace</p> <p>Draft Policy EC5 relates specifically to LSIS land and states that LSIS will generally be protected for a range of Class B and appropriate sui generis uses. It goes on to state that the co-location of employment and other compatible uses (including residential) will only be supported at selected LSIS locations that are proposed for allocation under Part C of Draft Policy EC5. This does not include our client’s Site.</p> <p>The Council’s decision making process for identifying some LSIS sites for mixed use allocation is not clear and as a result the policy approach is disputed. The Council notes that the proposed allocations for co-location are made having regard to the Lewisham Employment Land Study (2019) which assesses employment land supply in the Borough. The Study states that:</p> <p><i>“Opportunities and constraints for redevelopment, intensification, extension, and refurbishment are considered, and if there is an opportunity, how much developable land is available. If there are constraints, we have outlined these and stated if they are likely to be, or can be, resolved within the plan period”.</i></p>	<p>We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.</p>	<p>No change</p>

			<p>The Study provides an assessment of all designated employment sites against these criteria. We enclose the site assessment for Evelyn Street with these representations. The site assessment makes a series of broad brush statements about the Site, including that because of a lack of availability there are no opportunities for redevelopment, intensification and extension over the Plan period. The Study also states that because the Site is in a built up area it cannot be expanded. These statements cannot reasonably be used by the Council to make the judgement that the Site is not appropriate for co-location. This presents a soundness issue in so far as the Council’s approach is not justified nor based on sufficient evidence.</p> <p>By way of example our client’s Site measures 1.2 hectares and therefore is much larger than several other sites where the Employment Land Study suggests co-location would be appropriate. Table 1 below identifies several sites presented in the Study where clearly opportunities for co-location would be more challenging given their size, when also taking account of the policy requirement to ensure no net loss of industrial capacity.</p> <p><i>LB Lewisham officer note: Table 1: Employment Land Recommendations is included in the original representation. It shows recommendations in relation to Blackheath Hill, Evelyn Street, Perry vale and Clyde Vale.</i></p> <p>In light of the Council’s substantial housing needs it should be looking to exhaust all opportunities to deliver development. The Council must therefore encourage the masterplan approach for other LSIS sites not identified in the Regulation 18 Plan.</p> <p>In the case of Evelyn Street, the Site could deliver a substantial mixed use development, that could also re-provide employment use and ensure no net loss of industrial capacity, whilst also delivering other strategic objectives including housing delivery (which could include affordable housing). The Site is also considered a suitable location for tall building development in the emerging Plan and is in a location where tall buildings are commonplace, including Deptford Wharves and Convoys Wharf.</p> <p>There are no designated heritage assets in its vicinity that would limit its suitability as a location for high density, mixed use development. The potential for impacts on the surrounding area could be dealt with through a sensitive design response as part of the masterplan process, without needing to stymy development of the Site through an overly restrictive policy approach based on insufficient evidence.</p>		
Notting Hill Genesis (Savills obo)	2	EC 05	<p><i>Relates to Call for site</i></p> <p>The Council’s approach to the co-location of industrial uses and residential uses is set out within Policy EC5 (F) (a) of the draft Local Plan and states the following: <i>“Within LSIS proposals for non-employment uses (i.e those outside of the B Use Class) will only be supported where they; (a) Are not residential uses;...”</i></p> <p>Policy E7 (Industrial Intensification, co-location and substitution) of the London Plan states that intensification of industrial capacity in selected parts of LSIS could be considered as part of a plan-led process of intensification and</p>	Comments are noted. The designation of Malham Road Industrial Estate as an LSIS has been informed by the Lewisham Employment Land Study that identifies the site as a successful employment site with low vacancy rates and high	No change.

			<p>consolidation, and this process could be used to facilitate the delivery of residential and other uses (our emphasis). In LSIS, the scope for co-locating industrial uses with residential and other uses may be considered, but this should also be part of plan-led or masterplanning process, and should not come forward through ad-hoc planning applications.</p> <p>We therefore consider that draft Local Plan Policy EC5 is not consistent with Policy E7 of the London Plan, which sets out that development plans and proposals should be proactive and encourage the intensification of business uses to facilitate the consolidation of an identified LSIS to support the delivery of residential and other uses as part of a masterplanning process. It is also not consistent with national policy which requires planning policies support development that makes efficient use of land. As such, we respectfully request that the wording of Policy EC5 (F) is amended as follows (additions are identified as underlined and deletions have a strikethrough, as illustrated below):</p> <p>“Within LSIS proposals for non-employment uses (i.e those outside of the B Use Class) will only be supported where they (a) are not residential uses.”</p> <p><u>“Within LSIS, proposals for non-employment uses (including residential uses) will be supported where a comprehensive, design-led redevelopment scheme can be demonstrated; this could include the scope for collocating industrial uses with residential and other uses as set out Policy E7(D) of the London Plan.”</u></p> <p>LBL’s Employment Land Study (2018) identifies that the existing units within Malham Road Industrial Estate are generally dated and that some units are coming towards the end of their economic life. The study further states that there is an opportunity to redevelop the more dated units to provide better quality units that meet modern occupier requirements. However, the current drafting of the policies are overly-prescriptive and insufficiently flexible, and therefore unlikely to support the site’s full redevelopment potential. The draft Local Plan is therefore not effective and not consistent with national policy because it does not promote and support the development of under-utilised land and buildings.</p>	<p>demand for employment uses. Fragmentation of the site, through co-location, will restrict the operational nature of the employment uses, undermine the viability of this important LSIS and will be contrary to ensuring sufficient industrial land and capacity to meet the Borough’s future needs.</p>	
Stoken Properties Ltd (Boyer obo)	2	EC 05	<p><i>Relates to Call for site</i></p> <p>It is understood that the site will be designated as a Locally Significant Industrial Location (LSIS) in the emerging Local Plan. Emerging Policy EC5 (Locally Significant Industrial Sites) aims to protect the employment capacity of such sites but recognises that there is potential for the co-location of uses, including residential, providing there is no significant reduction in industrial capacity.</p>	<p>Noted. Responses to additional representations set out elsewhere in Consultation Statement.</p>	<p>No change.</p>
Stoken Properties Ltd (Boyer obo)	2	EC 05	<p><i>Relates to Call for site</i></p> <p><u><i>Response to Draft Policy EC5 (Locally Significant Industrial Sites (LSIS) – formerly LEL)</i></u></p> <p>In response to Draft Policy EC5, firstly it is noted that the policy refers to <i>Class B Uses</i>. Existing Class B Uses are to be replaced with Class E uses and so we would seek clarity on this point.</p> <p>Whilst the overall objective of the policy to protect industrial capacity is supported, a clear distinction between industrial floorspace and people employed on site is needed. In the current and changing climate, it is felt that it is</p>	<p>Noted</p> <p>Our amended policy on LSIS is in accordance and supported by higher level policy and our Evidence base.</p>	<p>Local Plan will be updated to refer to new Use Class Order.</p>

		<p>unreasonable to class floorspace as “capacity”. Working practices have changed and there is no longer such a need for large industrial units, particularly in built up areas. Instead, there is a preference for smaller, more efficient workshops/offices that, whilst smaller in terms of floorspace, can provide a greater number of jobs than the previous operation which required a large floorspace. There therefore needs to be a clear distinction between floorspace and number of employees as if capacity in this regard relates to floorspace, it could restrict development and cause sites to become vacant and underutilised.</p> <p>In particular, Part D of the Policy confirms that proposals for the co-location of uses on the listed LSIS sites, which result in the net loss of industrial capacity, will only be permitted in exceptional circumstances. It is felt that a more pragmatic and reasonable understanding of “capacity” in the context of older industrial sites is needed and the policy made more flexible.</p> <p>Similarly, in Part D of the Policy whilst we support that provision should be made for at least 50 per cent affordable housing on any residential element of development, it is felt that viability should be taken into consideration.</p> <p>In some instances, especially in the case of older industrial units, the units are no longer fit for purpose and a significant amount of work and investment is required to bring them up to modern standards. Where this is the case, a residential element may be necessary in order to facilitate the overall development and given the significant costs, it may not be viable to provide 50 per cent affordable housing and so flexibility is required.</p> <p><i>Policy Wording</i> We set out below our response to specific parts of the policy and how the policy should be worded. For consistency, throughout this letter, anything underlined is our proposed wording to the policy.</p> <p>Part A of the Policy states: <i>Locally Significant Industrial Sites will be protected for a range of Class B Uses (B1, B2 and B8) along with appropriate Sui Generis uses, with priority being given to Class B1 uses.</i> We would urge that this is amended to reflect the new planning use classes and reads as “<i>Locally Significant Industrial Site will be protected for a range of <u>Class E uses and B2 and B8 uses</u>, along with appropriate Sui Generis uses.</i>”</p> <p>Part D of the Policy states: <i>Proposals for the co-location of uses on LSIS sites listed in (C) above which result in the net loss of capacity will be strongly resisted and only permitted in exceptional circumstances...</i> We challenge the use of “capacity” when referring to the existing industrial use. We suggest that this is replaced with “<i>no net loss of <u>on-site employees</u>.</i>” This will provide clarity and will not act as a barrier for development proposals coming forward.</p> <p>Criterion d. of Part D advises that proposals for the co-location of uses should, amongst other things:</p>		
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			<p><i>d. Makes provision of at least 50 per cent affordable housing on the residential element of the site.</i></p> <p>We suggest that criterion d. reads “<i>provision of at least 50 per cent affordable housing on the residential element of the site <u>unless it can be robustly demonstrated that this is not viable.</u></i>” This would ensure that potential redevelopment of older industrial sites are not discouraged due to high development costs and 50 per cent affordable housing not being achievable.</p>		
Artworks Creekside (Avison Young obo)	2 2	EC 05 Page 266	<p><i>Relates to Part 3, LNA SA 16</i></p> <p><i>Draft Policy EC5 – Locally Significant Industrial Sites (LSIS) – formerly LEL</i> As with the commentary on Policy EC2, the principle of no net loss and the 65% plot ratio has been omitted from the adopted version of the London Plan and Policy EC5 D should be updated accordingly to reflect the requirement of the London Plan to ensure that within LSIS’ intensification can also be used to facilitate the consolidation of an identified SIL or LSIS to support the delivery of residential and other uses. Notwithstanding this, Artworks Creekside support the principle that co-location is allowed within the Creekside LSIS.</p>	<p>Noted. The London Plan provides that Local Plans can include provisions to retain SIL, LSIS and other industrial sites / capacity, taking into account local evidence. The Employment Land Study makes clear that Lewisham has experienced a significant loss of capacity and recommends that remaining capacity be retained in order to help meet identified needs over the plan period. The no net loss principle is therefore considered to be justified and in conformity with the London Plan.</p> <p>However it is acknowledged that the draft Local Plan definition of industrial capacity should be amended for conformity with the London Plan.</p>	Local Plan amended to provide new definition of industrial capacity and removal of 65% plot ratio.
Artworks Creekside (Avison Young obo)	2 2	EC 05 Page 266	<p><i>Relates to Part 3, LNA SA 16</i></p> <p><i>Draft Policy EC5 – Locally Significant Industrial Sites (LSIS) – formerly LEL</i> Part E of the draft Policy refers to LSIS listed in Part B; this should be corrected to Part C which provides the list of LSIS sites where co-location is supported.</p>	Noted. This is an editorial error that will be rectified.	Local Plan amended to make appropriate policy cross-reference.
Artworks Creekside (Avison Young obo)	2 2	EC 05 Page 266	<p><i>Relates to Part 3, LNA SA 16</i></p> <p><i>Draft Policy EC5 – Locally Significant Industrial Sites (LSIS) – formerly LEL</i> Part E states that where proposals come forward on LSIS co-location sites where an approved sitewide masterplan is not in place, Criteria in Parts F and G of the policy will apply. Part F(a) of this policy states that residential uses would not be supported, which conflicts with the proposed Site Allocation 16 (discussed later in this representation) which identifies that residential uses are considered to be compatible and suitable as part of a co-location scheme at Lower Creekside.</p>	Noted. The Council considers masterplans are necessary to ensure certainty over the delivery of outcomes sought on site allocations, including the selected LSIS sites where co-location is acceptable in principle.	Local Plan amended to delete Policy EC5.E.

			<p>The explanatory text on page 266 states that proposals for non-employment uses in LSIS would be resisted if a site wide masterplan has not been agreed or approved because the Council want to <i>‘ensure that the employment generating function of LSIS land remains intact and is not eroded by the piecemeal introduction of non-employment uses’</i>.</p> <p>It is unclear whether this is agreed as part of a pre-application process, as part of a Site Allocation or requires a single planning application to consolidate all sites within a masterplan. In this latter scenario, this is a wholly restrictive and inappropriate control over the development of individual sites. Whilst we are working with adjacent land owners at 5-9 Creekside, this imposes a harmful policy control which is contrary to good planning practices.</p> <p>Furthermore, this approach is contrary to the aspirations of the London Plan, which states at Policy E7 that <i>‘Development Plans and development proposals should be proactive and encourage the intensification of business uses, inter alia.’</i> Further, Part D of Policy E7 sets out the principles for which developments proposing the co-location of uses must consider.</p> <p>As with the Council’s previous approach to 1 Creekside, if the proposals for alternative uses, specifically residential, meet the requirements of Policy E7 of the London Plan, and would intensify industrial use, the overarching policy requirement will still be met and adjacent sites, whether in retained industrial use or otherwise, are still considered as part of this determination process. Where a number of sites are being brought forward as part of the wider regeneration of an area which include co-locating factors, the requirement for comprehensive masterplanning that has been agreed or approach may be compromised by land ownerships etc. and ultimately delay the delivery of much needed accommodation, both employment and residential for the borough.</p> <p>The Council has extensive policy requirements to secure a design-led response to redevelopment and the requirement to ensure placemaking principles and the impact upon adjacent sites would therefore request that Part F(a) is removed.</p>	<p>However, it is acknowledged that Policy EC5.E could lead to confusion over the acceptability of uses with LSIS and should be deleted. This will provide more clarity for policy implementation, where criterion F deals exclusively with sites where co-location on LSIS is not supported.</p>	
Artworks Creekside (Avison Young obo)	2	EC 05	<p><i>Relates to Part 3, LNA SA 16</i></p> <p>Summary Paragraph 35 of the National Planning Policy Framework (NPPF) (2019), confirms the examination tests which will be applied to new Local Plans and spatial development strategies to ensure they have been prepared in accordance with legal and procedural requirements. Plans will be found ‘sound’ if they are positively prepared, justified, effective and consistent with national policy. Paragraph 36 of the NPPF states that the tests of soundness will be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area.</p> <p>For the reasons set out above, we have particular concern that the direction for LSIS’ are not consistent with the relevant strategic policies within the recently adopted London Plan. The current drafting of the draft Local Plan reflects a previous iteration of the Intend to Publish London Plan (2019) which was subject to a direction from the Secretary of State on 13th March 2020. In the absence of</p>	<p>Noted. Comments to detailed representations set out elsewhere in the Consultation Statement.</p>	<p>No change.</p>

			the revision to the draft Lewisham Local Plan policies accordingly, alongside those other comments above, the Local Plan is considered unsound.		
Big Yellow Storage Company Limited (DWD obo)	2	EC 05	<p>Policy EC5 (Locally Significant Industrial Sites – formerly LEL)</p> <p>Big Yellow strongly objects to Part B of this policy and requests that it is deleted.</p> <p>Part B states:</p> <p><i>“Within LSIS, proposals for self-storage and larger format storage and warehousing facilities will only be supported in exceptional circumstances where:</i></p> <p><i>a. There is a demonstrable local need for this type of use;</i></p> <p><i>b. The use cannot be reasonably located in a Strategic Industrial Location; and</i></p> <p><i>c. The development will include provision of an element of floorspace for micro, small or medium sized businesses.”</i></p> <p>The explanation for this approach is set out as follows:</p> <p><i>“In order to make the best use of land there will need to be a managed process of employment site intensification. The Lewisham Employment Land Study (2019) provides that the Borough’s future requirements are primarily for Class B1 uses. We will therefore seek to resist proposals in LSIS that are solely for self-storage or larger format warehousing and storage facilities (normally included in the B8 Use Class). The built formats of warehousing units or self-storage facilities often do not provide for flexible re-use and are characterised by low employment densities, with limited opportunities for jobs compared to other development typologies. We need to ensure that these larger scale storage uses do not predominate on what is, in Lewisham, a very limited supply of employment land. However, it is acknowledged that storage facilities can help to support the wider regional economy, particularly the logistics sector. They also provide valuable space for smaller businesses and businesses requiring additional off-site provision. We will therefore consider proposals where applicants can show there is a local demand for the warehousing or storage use. Proposals must also demonstrate that there are no suitable or available sites in SIL where this type of development can be more appropriately located. This should include a detailed site survey investigating availability of sites both within and in proximity to Lewisham, including its neighbouring Boroughs and in those in the London southeast sub-region. All proposals for large format storage and warehousing should deliver an element of flexible workspace to meet needs of micro, small and medium sized business.”</i></p> <p>Big Yellow would like to make two points:</p> <p>1. Big Yellow disagrees with the reductive assertion in the explanation that self-storage facilities are characterised by low employment densities. It is acknowledged that direct employment associated with self-storage facilities is low but there is a common misconception with respect to their overall contribution to supporting employment indirectly.</p> <p><i>LB Lewisham officer note: Appendix B: Big Yellow Employment Survey is included in the original representation. It provides details of a survey carried out in February 2018 and collates the responses of 545 responses received.</i></p> <p>Big Yellow has undertaken a survey (attached as Appendix B) of their existing stores to establish the employment impact of a Big Yellow store. This survey showed that the majority of customers of a store will be domestic, with the remaining 16% being business customers. Proportionally however, business</p>	<p>Noted. It is agreed that storage and warehousing uses can contribute positively to the local and wider regional economy. The Local Plan will therefore be amended to provide stronger support for the Class B8 Uses within SIL, which are considered the most appropriate locations for these uses.</p> <p>However officers do not consider that the policy should be deleted, as suggested. The Lewisham Employment Land Study (2019) identifies that the Borough’s future requirements are primarily for Class B1 or similar commercial and industrial uses, and not B8. It will therefore seek that future development on LSIS helps to meet this identified need as a priority. The policy will be amended to provide that B8 uses may be acceptable where there is a demonstrable need or also ‘market demand’ for the use – this will provide greater flexibility for B8 uses to come forward.</p>	<p>Policy EC5.B amended to provide that B8 uses may be acceptable where there is a demonstrable need or ‘market demand’ for the use.</p> <p>Supporting text amended to reflect that Class B8 uses make a contributions to London’s economy and do not necessarily result in low employment densities.</p>

			<p>customers usually occupy a greater area of floorspace, at 28% of the average store. This survey also showed that the main employment impact is not from direct employment (approx. 3 people per store). Instead, the main employment impact comes from the large number of jobs created by the business occupiers.</p> <p>The average Big Yellow store is home to 105 business customers, and the average business customer employs around three people directly because of their space in Big Yellow. This means that the average Big Yellow store directly accounts for over 300 jobs.</p> <p>The local economic benefit of this is significant – the jobs in the average Big Yellow generate a local Gross Value Added (GVA) of around £17m a year.</p> <p>This level of employment compares very favourably with many alternative employment uses. Allowing for non-business occupiers, and all the non-lettable space (like corridors, lifts, toilets and reception), it works out on average as one job for every 28 square metres gross internal area (GIA) across the whole store. This is a significantly higher job density than, for example, Class B2 Manufacturing at 36sqm GIA per job, or B8 storage/distribution at 70-95sqm per job.</p> <p>This means that a three-storey Big Yellow store would typically create four times as many jobs as a single-storey industrial unit of the same footprint.</p> <p>Across Britain, Big Yellow is home to over 7,700 businesses, and 23,000 jobs (assuming an average of 315 jobs per store). The businesses in Big Yellow together generate a GVA contribution to the national economy of over £1bn a year. Big Yellow is therefore a small-business landlord and startup incubator on a huge scale.</p> <p>On this basis, it is clear that self-storage uses provide a significant employment contribution and the view taken by the Borough to limit their development is not positive plan making and does not accord with paragraph 11 of the National Planning Policy Framework.</p>		
Selkent Holdings (Daniel Watney LLP)	2	EC 05	<p><i>Relates to Part 3, LWA SA 09</i></p> <p>Policy EC5 – Locally Significant Industrial Sites We welcome the introduction of Policy EC5 relating to Locally Significant Industrial Sites (LSIS) and the redefinition of these sites from Local Employment Locations (LELs) to ensure compatibility with the new London Plan. We accept the approach to being employment-led development and strongly welcome the approach taken through Part (C) which supports co-location of employment and other compatible uses at selected LSIS locations, including Willow Way.</p> <p>This co-location approach is appropriate for the Willow Way LSIS and aligns with the aspirations of the new London Plan, and the pre-application engagement undertaken by our client on their site, and therefore this designation should be retained.</p> <p>We are currently concerned over Part (E) of draft Policy EC5 as currently worded which states the following:</p>	<p>Noted. The Council considers masterplans are necessary to ensure certainty over the delivery of outcomes sought on site allocations, including the selected LSIS sites where co-location is acceptable in principle.</p> <p>However, it is acknowledged that Policy EC5.E could lead to confusion over the acceptability of uses with LSIS and should be deleted. This will provide more</p>	<p>Local Plan amended to delete Policy EC5.E.</p>

		<p><i>“For LSIS listed in (B) above [including Willow Way], where an approved site-wide masterplan is not in place, proposals for non-employment uses will be assessed against the criteria in (F) and (G) below, which also apply to all proposals for all other LSIS locations (i.e. not listed in (B) above).”</i></p> <p>Parts (F) and (G) of the draft policy then go on to consider a range of restrictions including, but not limited to, a restriction on any residential uses in these locations.</p> <p>The supporting text then goes on to consider that <i>“in the interim period where a site-wide masterplan has not been approved or agreed by the Council, proposals for non-employment uses within LSIS will be resisted unless they meet the criteria of Policy EC5(E). This is to ensure that the employment generating function of LSIS land remains intact and is not eroded by the piecemeal introduction of non-employment uses.”</i></p> <p>The definition of site-wide masterplan needs to be elaborated upon here, due to the current ambiguity and barrier this could cause to development on such sites.</p> <p>Whilst we recognise the importance of individual schemes being designed in a way which does not prejudice or compromise its neighbours being brought forward for redevelopment in the future, particularly in wider site allocations, the explicit requirement for a site-wide masterplan could cause problems without a more refined definition.</p> <p>Given the numerous landowners within the Willow Way LSIS, there are varying levels of interest in redeveloping the entire site, from those landowners who are actively pursuing the option and engaging with the Council, to those who do not currently have the intention to redevelop.</p> <p>It will be impossible to have a single masterplan agreed by all landowners with a single planning application being brought forward for that masterplan across the whole site.</p> <p>We acknowledge that schemes would need to be cognisant of important masterplanning principles but believe this can be done through individual applications where necessary through detailed design measures and appropriate detailing, such as sufficient set-backs from neighbouring sites, positioning of units and windows to avoid future overlooking, and ensuring each sites takes its fair share of specific land uses including employment accommodation, residential accommodation, affordable housing, public realm and so forth.</p> <p>We would welcome the opportunity to discuss the definition of ‘site wide masterplan’ with policy planners ahead of the next stage of the Local Plan being issued. Our client is in early discussions with neighbouring landowners throughout the Willow Way LSIS so is acutely aware of the different levels of interest in bringing redevelopment forward. We would appreciate the opportunity to discuss how schemes can be brought forward using masterplanning principles and within a “site-wide masterplan” remit but not restricting landowners from bringing forward their own planning applications as and when they are ready to do so.</p>	<p>clarity for policy implementation, where criterion F deals exclusively with sites where co-location on LSIS is not supported.</p>	
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Big Yellow Storage Company Limited (DWD obo)	2	EC 06	<p>2. Thirdly, London Plan Policy E6 (A) (2) states that development plans should make it clear that the range of industrial and related uses that are acceptable in LSIS include, where appropriate, hybrid or flexible B1c/B2/B8. This does not reference all Class B1 uses (such as Class B1a offices) as is presently supported by Part A. On this basis, it is our opinion that Policy EC5 does not accord with the London Plan.</p>	<p>Disagree. The London Plan policy EC6 provides that Local Plans make clear the range of industrial and related uses that are acceptable in LSIS including, where appropriate, hybrid or flexible B1c/B2/B8. Officers do not consider the policy precludes office uses where there is evidence of need for this.</p> <p>The land use principles for LSIS are informed by the Lewisham Employment Land Study, which states that the borough’s principal needs are for office and light industrial uses, formerly in the Class B1 (now Class E(g).</p>	No change.
Millwall Football Club (CBRE Ltd obo)	2	EC 06	<p><i>Relates to Part 3, LNA SA 08</i></p> <p>(7) Mixed Use Employment Locations (MELs)</p> <p>The Surrey Canal Triangle is identified as a Mixed-Use Employment Allocation (Draft Policy EC6). The requirements of parts A and B + C of this policy pull in different directions when the practicalities of implementing the policy is considered. Part (A) requires that <i>‘all development within MELs must be delivered in accordance with relevant site allocation policies and a sitewide masterplan.’</i> This approach is sensible and provides a framework around which to consider the application proposals at Surrey Canal Triangle.</p> <p>However, Part B and Part C both require that development proposals will be required to maximise the amount of Class B1 employment floorspace through site redevelopment. They further state that proposals will be expected to make provision for new modern workspace and associated operational land. Furthermore, Part C states that all future proposals involving the redevelopment or change of use of land or floorspace must:</p> <ul style="list-style-type: none">▪ Retain, and wherever possible seek to increase the proportion of industrial capacity (including Class B floorspace) across the MEL, as originally approved in the masterplan; and▪ Ensure that there is no let loss of existing industrial capacity. <p>The ability to meet this objective is likely to present conflict with the requirements to expand and improve the stadium and the stadium land should be identified as being exempt from these policy requirements. Any requirement to co-locate employment development alongside expansion to the stadium is likely to introduce additional conflicts (compared to other uses) for the safe</p>	<p>Support for part A is noted. Agree that proposed works to the stadium will not be required to provide industrial floorspace where it can be demonstrated that it would be incompatible with the use of the stadium. This will be assessed through the Development Management process.</p>	Local Plan amended by referring to the operational requirements of differing land uses and the Agent of Change principle.

			<p>access and egress of fans on matchdays. It is likely that the commercial attractiveness of any employment development in close proximity to the stadium could be limited by the need for matchday/weekend controls on employment uses which could limit the way businesses can use the units and ultimately how attractive the units are. This attractiveness of development that is provided alongside the stadium expansion is a key consideration when set against the previous comments raised with respect to the stadium expansion and redevelopment being delivered by enabling development.</p> <p>A simple amendment is required to the site allocation policy and/or Draft Policy E6 to confirm that the proposed works to the stadium will not need to comply with the requirements set out in E6.</p>		
L&Q Group	2	EC 06	<p><i>Relates to Call for site</i></p> <p>This should also be reflected in Policy EC6 which should be updated to accord with the most up to date Use Classes Order, including the new wider E class use. As part of the final amendments to the London Plan, the SoS is clear that the aspiration in the NPPF is that Local Plans ‘provide’ sufficient industrial land, rather than simply ‘retain’ it, taking account of the need of both residential and business communities.</p>	Noted.	Local Plan amended to reflect the changes to the Use Class Order, including the new Class E.
L&Q Group	2	EC 06	<p><i>Relates to Call for site</i></p> <p>Within the supporting text of Policy EC6, there is a lot of detail on the evidence required to demonstrate the uplift in jobs through re-provided commercial use. Notably jobs during the construction period will not be considered as part of the uplift. We note that the quality of the employment provision will also be taken into consideration – more clarity is required about what this entails.</p>	Noted. It is considered that the supporting text provides sufficient detail to address requirements around jobs uplift. However it is recognised that there may be implementation issues with respect to job quality, and as such this criterion will be removed.	Local Plan Policy EC6 amended to provide clarifications on requirements for jobs associated with new workspace delivered in MELs.
Lendlease (Lichfields obo)	2	EC 06	<p><i>Relates to Part 3, LNA SA 02</i></p> <p>Economy and Culture</p> <p><i>Policy EC6 Mixed-use Employment Locations (MEL)</i></p> <p>Lendlease has concerns about the restrictive nature of parts B and C(a) of this policy. In particular, part B states that development proposals ‘<i>will be required to maximise the amount of Class B1 employment floorspace through site redevelopment, along with providing a demonstrable and significant uplift in the number and quality of jobs</i>’. More flexibility should be applied here, requiring that the uplift in number and quality of jobs is secured through ‘a range of commercial uses’, rather than the restriction to B1 floorspace.</p> <p>The site allocation for Deptford Landings (paragraph 15.27) refers to the ‘provision of commercial floorspace in line with Policy EC 6’, however as mentioned above, Policy EC6 refers specifically to B1 floorspace. It is therefore requested that EC6 is updated in line with the site allocation. Furthermore, it is unclear if Part B applies to sites such as Deptford Landings which have an approved masterplan.</p>	<p>Noted. Agree that more flexibility should be applied to the range of uses specified given role of MELs.</p> <p>Officers disagree that the policy should refer instead to net loss of jobs. MELs are designated employment land and therefore it is considered appropriate to retain industrial capacity.</p> <p>The policy is considered flexible enough to address revisions to masterplans and revisions to planning consents, as these will all be considered through the</p>	Noted. Policy for MEL amended to provide support for a range of commercial uses, including workspace (with priority given to office and light industrial where workspace is delivered).

			Part C(a) is similarly restrictive and does not allow for revisions to approved masterplans over time, due to changing economic circumstances or shifting demand. This is particularly important in the current economic climate and the implications which have been presented by Covid-19. It is considered that the wording of this policy should be amended to permit a caveat which states that where changes of circumstance require a revision of the masterplan, or there is a benefits case for alternative uses to come forward, the loss of employment land may be acceptable provided that job creation figures are maintained. Rather than referring to a ‘net loss of existing industrial capacity’, the policy should refer to a ‘ <u>net loss of jobs</u> ’, allowing for more flexibility while securing the economic benefits of development.	planning approvals process.	
Notting Hill Genesis (Savills obo)	2	EC 06	<p><i>Relates to Call for site</i></p> <p>In addition to the above, it is noted that the wider Malham Road Industrial Estate has a wide range of existing uses outside of commercial and light industrial use, including a place of worship, hot food takeaways and residential. In light of the wide range of existing uses, including those Use Class E units (which benefit from Permitted Development within the Use Class) as well as the underutilised nature of the industrial units, as set out within LBL’s Employment Land Study (2018), it is considered that the site should be designated as a Mixed- Use Site Allocation to include industrial and residential uses, which would be more fitting to its function. There is a significant opportunity for the site (and potentially the wider Malham Industrial Estate) to meet a range of priorities for Lewisham. There is the opportunity the site could deliver a mixed use redevelopment which could include the delivery of an enhanced employment provision, new homes and new affordable homes.</p>	Noted. The designation of Malham Road Industrial Estate as an LSIS has been informed by the Lewisham Employment Land Study that identifies the site as a successful employment site with low vacancy rates and high demand for employment uses. Fragmentation of the site, through co-location, will restrict the operational nature of the employment uses, undermine the viability of this important LSIS and will be contrary to ensuring sufficient industrial land and capacity to meet the Borough’s future needs.	No change.
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	2	EC 06	<p><i>Relates to Part 3, LNA SA 14</i></p> <p>Policy EC6 Mixed-use Employment Locations We note that in relation to Mixed-use Employment site allocations, Policy EC6 states that: <i>“A) The comprehensive redevelopment of Mixed-use Employment Locations will be supported in order to facilitate their renewal and regeneration and to secure provision of new modern workspace. All development within MELs must be delivered in accordance with relevant site allocation policies and a site wide masterplan.</i> <i>B) All new development will be expected to protect and enhance the employment generating function of MEL land. Development proposals will be required to maximise the amount of Class B1 employment floorspace through site redevelopment, along with providing a demonstrable and significant uplift in the number and quality of jobs.”</i></p> <p>Paragraph 22 of the NPPF states that long-term protection of sites for employment uses should be avoided where there is no reasonable prospect of the site being used for allocated employment uses. We therefore consider the</p>	Noted. The suggestion to incorporate homes in the policy text is noted, however the policy is dealing principally with MELs as designated employment land and focusses on employment provision. Notwithstanding this, the policy makes clear that MELs include provision for a mix of uses. In principle support for residential uses is established through corresponding site allocations.	No change.

			<p>requirements of the above policy are not consistent with national policy. This could also have an effect on unnecessarily constraining development and would therefore not be effective in its delivery. As such, we request that the wording of Policy EC6 be amended as follows (the additions are shown underlined):</p> <p><i>A) The comprehensive redevelopment of Mixed-use Employment Locations will be supported in order to facilitate their renewal and regeneration and to secure provision of new modern workspace and homes. All development within MELs must be delivered in accordance within the relevant site allocation policies and a site wide masterplan where there is demand for the proposed uses.</i></p> <p>Making these changes would ensure that the draft Local Plan is consistent with national policy and effective in its delivery.</p>		
Cockpit Arts (The Planning Lab obo)	2	EC 06	<p><i>Relates to Part 3, LNA SA 14</i></p> <ul style="list-style-type: none">• CA is generally supportive of the MEL designation that covers the Sun Wharf site allocation, and the emphasis on protecting and enhancing the employment-generating function of this land. However, we note conflicts with this policy and the Sun Wharf allocation (SA14) – which do not reflect current/live development proposals for residential led development and that could render the policies out of date prior to adoption.• We strongly endorse the requirement for development within MELs to be delivered in accordance with a masterplan. This is needed to ensure that non-employment uses brought forward within a MEL do not stymie future employment-led development within that area.• We note that the new Plan recognises that the requirement in the previous version for development in MELs to deliver 20% of new floorspace as office floorspace was not being met. How will delivery against the requirement for development proposals to ‘maximise the amount of employment floorspace’ be assessed/measured/enforced?• How will this policy be applied to applications already under consideration in MELs which do not meet these policy requirements, including in terms of delivering according to a masterplan or in terms of maximising floorspace?• What steps will LB Lewisham take where different developments are coming forward within a MEL - at different times and by different owners - to ensure each is shouldering the right level of responsibility in terms of the provision of employment space?	Noted. All MELs have corresponding site allocations, which necessitate that development must be delivered through the masterplan process. The Part 4 policy on masterplans and comprehensive development provides further details. Planning applications will be considered in accordance with the development plan unless material considerations indicate otherwise.	No change.
The Renewal Group (Carney Sweeney obo)	2	EC 06	<p><i>Relates to Part 3, LNA SA 08</i></p> <p>Policy EC6 Mixed Use Employment Locations (MEL) Again, policy EC6 needs to be updated to reflect final changes to the London Plan prior to its adoption and publication, changes to the use classes order, in particular the new Use Class E and the imminent amended permitted development rights later this year. The Inspector considering the Westminster Local Plan in 2020 made clear the importance of this.</p>	Noted.	Local Plan amended to reflect and respond to changes to permitted development rights and the Use Class Order, including the new Class E.
Big Yellow Storage Company Limited (DWD obo)	2	EC 07	<p>Policy EC7 (Non-Designated Employment Sites) Big Yellow supports part A of this policy, which seeks to resist development proposals that result in the net loss of viable industrial capacity.</p>	Support noted.	No change.

			Big Yellow also supports parts B and C of this policy on the understanding that they simply provide in principle support for employment-led, mixed use development on these sites, and do not place a requirement for such proposals.		
The Arch Company Properties LP (Turley obo)	2 2	EC 08 Paras 8.21 and 8.44	<p><i>Draft Policy EC8 (Railway Arches)</i></p> <p>As one of the majority land owners of railway arches in the borough, our client welcomes that the Council recognises that <i>“there are opportunities to maximise the use of the space of [railway] arches and the ancillary land adjacent to them”</i> (para. 8.44). As set out above, operating a vast number of railway arches across London, The Arch Company considers that these can cater for a wide range of uses and occupiers and be a significant contributor to the Council’s ambition of building a strong economy. Railway arches further have the potential to positively contribute to the vitality and vibrancy of an area and to promote its resilience through a diversity of uses, particularly within or in close proximity to town centres.</p> <p>Depending on their location and surrounding uses/occupiers, railway arches should therefore be able to cater for a wide range of uses including industrial, commercial, community (i.e. gyms), economic (i.e. workspace) and/or storage and distribution uses, but also wider town centre and leisure uses (where appropriate), in order to provide the flexibility that is required by (potential) occupiers when adapting to market needs/demand and to ensure that they actually meet their full potential.</p> <p>At present, the draft policy wording is unfortunately considered to be somewhat unclear and potentially restrictive to future development, thereby limiting the use of railway arches where this may lack flexibility and in turn be detrimental from an economic (recovery) perspective. Similar to what is reflected in other (emerging) railway arch policies across London, it is recommended to refine the draft wording in order for it to:</p> <ol style="list-style-type: none">1. Be fully effective;2. Be responsive in respect of the impacts of the COVID-19 pandemic and our economic recovery;3. Provide (small/local) businesses and future occupiers with the flexibility as well as clarity required to invest in an area; and4. Ensure that railway arches can accommodate a wide range of (acceptable) uses. <p>As such, our client recommends the following amendments to the draft policy wording: <i>“A. Development proposals involving railway arches will be supported where:</i></p> <p><i>a1. The principal use is for an appropriate commercial (including town centre, community, leisure and/or business uses) or industrial use (Class E(g)(ii)/(iii), B2 and B8), certain sui generis uses in appropriate locations where these do not cause harm to the amenity of surrounding uses and occupiers, or otherwise for an operational use associated with the railway;</i></p>	Agree that there could be further clarity and flexibility in how railway arches can cater for a diversity of land uses.	Policy supporting text amended to make clear that appropriate uses will be considered on a case-by-case basis having regard to Local Plan policies which set parameters for land uses in specific locations (e.g. town centres, designated employment areas and non-designated employment sites).

			<p><i>a2. In designated employment [or industrial] areas (i.e. LSIS, SIL) or Non-Designated Industrial Land, the principal use shall be limited to appropriate Class E(g), B2, B8 uses and/or related sui generis or other uses that relate to, and support, the industrial nature and operation of the area, or otherwise for an operational use associated with the railway, unless where they form part of a masterplan-led redevelopment (see Part B);</i></p> <p><i>[...]”</i></p> <p>Part a2 has been added to provide clarity on acceptable uses within railway arches in designated employment areas and/or industrial land (i.e. LSIS, SIL, MEL or Non-Designated Industrial Land). It is important to differentiate between designated industrial and other locations to provide businesses and occupiers with the clarity they need.</p>		
The Arch Company Properties LP (Turley obo)	2	EC 08	Our client is supportive of establishing a new railway arches policy (Draft Policy EC8), but has proposed suggestions to ensure it is clear and effective in order to provide the flexibility required to operate these arches in the best possible way which adequately reflects occupier demand, day-to-day operational/letting requirements and market conditions.	Noted. Responses to other detailed representations set out elsewhere in the consultation statement.	No change.
The Arch Company Properties LP (Turley obo)	2 2	EC 08 EC 04	<p>In relation to Part A(e), it is recognised that a number of railway arches may offer low-cost business space, however, these are market levels and reflective of their (often) lower specification and non-prime locations (as acknowledged in para. 6.2.4 of the London Plan and elsewhere in the Draft Local Plan, i.e. para. 8.21). Similarly, there is a significant difference between open arches accommodating a simple storage function and those that are (subsequently) refurbished to a higher specification attracting different types of uses and occupiers.</p> <p>As such, it is first of all important to differentiate between existing low-cost (i.e. as described above) and affordable (i.e. as secured through a Section 106 Agreement) business space. Where such a Section 106 Agreement exists for a site or where railway arches form part of a wider (comprehensive) redevelopment, it is considered acceptable to link it to the requirements of <i>Draft Policy EC4 (Providing suitable business space and affordable workspace)</i>, however, in all other cases the nature of a proposed development will need to be fully considered, as future investment in or upgrading existing railway arches may otherwise be constrained or undermined (i.e. if such future rent levels would not be reflective of their higher quality specification or a change of use).</p> <p>It will therefore be important to avoid a misconception in this area with wider policies in the Draft Local Plan (i.e. Draft Policy EC4 referred to above) and it is recommended to (1) remove reference to ‘lower-cost’ workspace from Part A(e) of the draft policy wording and (2) to cover the provision of affordable workspace in Draft Policy EC4 only (see comments/suggestions below). However, the supporting text to Draft Policy EC8 may clarify that railway arches often provide low-cost business space (as set out above and in the London Plan) which may be re-provided if the nature of the proposals remain comparable and/or that Draft Policy EC4 applies where railway arches form part of a wider comprehensive redevelopment.</p>	Disagree that low cost workspace and railway arches should be removed from EC 08 Part A(e) and EC 04 Part D but that there is merit in providing greater clarity when affordable workspace can be retained.	<p>No change to policy EC 04.</p> <p>Local Plan (EC 08 part Ae) has been amended to provide greater clarity on retaining or re-providing affordable workspace.</p>
The Arch Company	2	EC 08	Whilst we recognise the importance of consultation with key stakeholders prior to the submission or during the determination of a planning application, it is considered that Part C of the draft policy wording may be onerous for future	Agree that there should be more flexibility in terms of	Local Plan (EC 08 part C) has been amended to provide greater

Properties LP (Turley obo)			applicants. Network Rail and Transport for London (“TfL”) may not both have an interest in the railway lines above respective arches and/or their asset(s) and/or TfL-managed roads may not be affected by the nature of the development proposals (i.e. a simple change of use). The policy wording should therefore be amended to state that: <i>“Network Rail and/or Transport for London should be consulted on development and design options where appropriate and required to ensure that development will not adversely impact on the public highway and rail network, or preclude the delivery of planned transport infrastructure”</i> .	consulting with transport stakeholders.	flexibility when consulting with transport stakeholders.
GHL (Leegate) Limited (Frank Knight obo)	2	EC 09	<i>Relates to Part 3, LEA SA 03</i> Policy EC9 (Workplace training and job opportunities) explains that all proposals for major development will be required to provide job and training opportunities to Lewisham residents, including apprenticeships, secured by way of planning conditions or S106 obligations.	Noted.	No change.
Barratt London and the Church Commissioners (Avison Young obo)	2	EC 10	<i>Relates to Part 3, LCA SA 20</i> Draft Policy EC10 Town centres at the heart of our communities Barratt London and the Church Commissioners strongly support this Draft Policy which focuses future growth and investment within and around town centres, particularly to optimise the use of land. The delivery of an appropriate mix and balance of residential and main town centre uses within town centres is also strongly supported.	Support noted.	No change.
WSP (Sainsbury’s Supermarkets Ltd obo)	3 2	LNA SA 09 EC 10	81. For these reasons the loss of the Sainsbury’s store will directly conflict with the new Local Plan Policy EC10: Town Centre at the Heart of Our Communities. 82. In summary, the detailed technical work that has been undertaken on behalf of the developers confirms that the retail impact of the loss of the Sainsbury’s store and existing retail warehouses will have substantial negative short-, medium- and long-term implications for the local community. These findings are supported by the Council’s own retail evidence base. 83. The impact of the closure of the Sainsbury’s store and the existing retail warehouses on New Cross/ New Cross Gate District Centre is a legitimate planning concern that must be taken into consideration as part of the new Local Plan process.	Comments are noted. The routing of the BLE, and the location of stations and required works sites associated with constructing the BLE, have already been through a consultation carried out by TfL and have been safeguarded by Government. This falls outside of the scope of the Local Plan.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	EC 10	Retail 11.7 The Reg 18 Plan includes a set of new draft retail policies (EC10 to EC14 inclusive are relevant). 11.8 Draft policy EC10 ‘Town centres at the heart of our communities’ reflects the approach of the London Plan and national policy in seeking to focus development in existing town centres. This policy highlights that town centres will be managed positively in order to ensure they are attractive and vibrant places that are resilient and adaptable to future challenges. These are identified to include those presented by new technology and changes in consumer behaviour. Reflecting future changes, the supporting text to this Policy (para. 8.53) highlights that: <i>“Whilst online shopping is affecting the retail sector, traditionally a stronghold of town centres, this has opened opportunities for the re-use of buildings.</i>	Support noted. We believe the Local Plan provides the appropriate balance between protecting the retail function of the town centre whilst providing flexibility in town centre uses to allow them to adapt.	No change.

			<p><i>Complementary cultural, leisure and community uses are increasingly taking up space in town centres, helping to attract visitors. Furthermore, town centres are now becoming a focal point for higher-density mixed use development, including housing. Whilst protecting the retail function of the Borough's town centres is crucial, we will seek to ensure that centres are able to evolve and adapt over time, so that they continue to support the communities in which they are situated."</i></p> <p>11.9 This approach is supported by Landsec, however following our conclusions set out in Chapter 5 and 7 of this report, we would urge the Council to strengthen this objective through the site allocations and town centre policies.</p> <p>11.10To achieve the long-term vitality and viability of Lewisham's town centres, draft Policy EC10 states that this will be secured through a number of measures. This includes delivering an appropriate mix and balance of residential and main town uses in order to attract visitors and ensure people have good access to a competitive range of services and facilities by seeking to define a broad range of matters that comprise vitality and viability. The draft policy also recognises that there is a need to ensure that town centres remain resilient and adaptable to change over the long-term.</p> <p>11.11Within this context, whilst protecting the retail function of the Borough's town centres is crucial, the ability for town centres to evolve and adapt over time, so that they continue to support the communities in which they are situated is welcomed.</p>		
Canada Life Ltd (Williams Gallagher obo)	2 2	EC 11 Table 8.2	<p><i>Relates to LCA SA 22</i></p> <p>Other Comments</p> <p>Policy EC11: Town centre network and hierarchy - We support this policy in combination with Figure / Table 8.2 which includes Site 22 within the Catford Town Centre Boundary.</p>	Support noted.	No change.
Barratt London and the Church Commissioners (Avison Young obo)	2	EC 11	<p><i>Relates to Part 3, LCA SA 20</i></p> <p>Draft Policy EC11 Town centre network and hierarchy</p> <p>Barratt London and the Church Commissioners broadly support the Draft Policy but request it acknowledge that housing can be a complementary use within town centres. The Council clearly supports mixed use development in Catford Town Centre as demonstrated by Draft Policy EC10 and the emerging allocations which seek housing alongside town centre uses including on the Plassy Island site (further details concerning this matter are included in below sections of this Representation).</p>	Noted. The policy already recognises the need to deliver an appropriate mix and balance of residential and main town centre uses. Land use principles are also established in the site allocation policies.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	EC 11	<p><i>EC11</i></p> <p>11.12Policy EC11 'Town centre network and hierarchy' seeks new development to support and reinforce Lewisham's town centre network and hierarchy. This Policy specially refers to the Borough's future retail needs over the period 2020 to 2030, which is identified to be 5,300 sqm (net), and that this should be focused in Lewisham and Catford town centres in the first instance. For the reasons set out above, the forecast needs of the borough will need to be updated through a new evidence base and household survey.</p> <p>11.13The supporting text (para. 8.60) outlines that this floorspace requirement is derived from the findings of the LRCSU. Notwithstanding that the LRCSU (and</p>	We believe that the evidence base prepared for the Local Plan reflects a proportionate response in accordance with higher level policy.	No change.

			<p>Local Plan Policy and text) needs to be updated by utilising up-to-date survey evidence and applying the latest data available, further clarity is provided on what this floorspace represents. The policy wording does not clarify that any future retail need is in the convenience retail sector only and that there is no capacity for further comparison floorspace. As currently worded, the Policy could be interpreted as suggesting that there is a requirement to deliver 5,300 sqm of retail floorspace(i.e. both convenience and comparison goods floorspace) between 2020 and 2030. Further clarity within the wording of Policy is therefore required.</p> <p>11.14Furthermore, part (c) of draft Policy EC11 needs to be amended to reflect the position of the London Plan and make reference to the ‘potential’ future reclassification of Lewisham as a Metropolitan Centre.</p> <p><i>“EC11(C) Development of Lewisham town centre and its surrounds will be proactively managed in order to secure its potential future reclassification as a Metropolitan centre....”</i></p> <p>11.15The supporting text identifies that Lewisham town centre is a key focal point of the Borough and is its principal shopping and leisure destination as well as a major transport hub. Whilst Lewisham is currently defined as a Major centre, it is undergoing significant transformation and offers the potential to be reclassified as a Metropolitan centre in the future, as indicated by the London Plan. The town centre already benefits from excellent public transport links, and the proposed Bakerloo Line Extension (BLE) route with a key interchange at the centre would further entrench the sub-regional importance of the centre. The Reg 18 Plan will supersede the LTCLP (2014) in setting the strategic framework to deliver the vision for a Metropolitan centre. This should conform to the London Plan and refer to the ‘potential’ for Metropolitan classification in respect to paragraph 8.58.</p>		
QUOD (Landsec obo - Lewisham Shopping Centre)	1 2	Strategi c Objectiv e 7 EC 11	<p>7 Strategic implications for Lewisham Town Centre</p> <p>7.1 The Council has had a longstanding aspiration to elevate Lewisham town centre to metropolitan status. The adopted Core Strategy (2011) promotes Lewisham Town Centre to Metropolitan status by 2026. The LTCLP repeats this vision and contains policies to deliver Metropolitan status.</p> <p>7.2 The emerging Local Plan maintains the policy aspiration for Lewisham town centre to achieve Metropolitan classification – Strategic Objective 7. Likewise, the London Plan states that Lewisham will grow in function and population and has ‘potential’ to become a town centre of Metropolitan importance.</p> <p>7.3 Draft Policy EC11 ‘Town centre network and hierarchy’ states that Lewisham town centre will be proactively managed in order to secure its future reclassification as a Metropolitan centre. This includes <i>“supporting investment and facilitating delivery of strategic infrastructure necessary to ensure the centre can effectively serve a local and wider subregional catchment”</i>.</p> <p>7.4 The London Plan also states that Lewisham will grow in function and population and has ‘potential’ to become a town centre of Metropolitan</p>	The approach taken in the Local Plan aligns with the findings of the Retail Impact Assessment and Town Centre Trends Study and is in conformity with the London Plan, that identifies Lewisham as a having the potential to become a Metropolitan Centre in the future.	Local Plan amended to expand upon how the town centre will evolve to become Metropolitan status.

			<p>importance. The potential for further growth at Lewisham will be supported by the arrival of the Bakerloo line at Lewisham Interchange to bring enhanced access to central London and encourage the delivery of employment, leisure, service and community uses that serve the local and sub-regional population.</p> <p>7.5 Public realm and environmental enhancements of the town centre and surrounding employment, mixed-use and residential re-developments will continue to be delivered and will assist the continued transformation of Lewisham into a high performing and vibrant retail hub with excellent leisure services.</p> <p>7.6 The Reg 18 Plan seeks to deliver this potential by aspiring to be a Metropolitan Town Centre by 2040 with the arrival of the Bakerloo line extension together with the modernisation of Lewisham Interchange.</p> <p>7.7 Landsec recognise this potential and supports Lewisham’s ‘aspiration to be a Metropolitan Centre’. However, Landsec would urge a degree of caution. The Reg 18 Plan whilst being aspirational should also be deliverable. It should reflect the London Plan’s objective of the ‘potential’ for Metropolitan status. However, due to the challenges of delivery and the structural change of town centres summarised in these submissions, the full implications for town centres are not yet fully understood thereby necessitating a degree of flexibility.</p> <p>7.8 Historically, local planning policy identified that the vision to achieve Metropolitan status was based on a requirement for considerable growth in comparison retail floorspace. This position was reached within a different retail context, namely one where the available retail evidence (published in 2009) suggested that there was substantial scope for further retail floorspace in Lewisham town centre.</p> <p>7.9 As outlined above, there has been a fundamental shift in the retail sector in recent years meaning that it is no longer the case that there is substantial capacity for further retail floorspace. Instead, there is very limited capacity (or commercial demand) for expansion of Lewisham town centre and there is an identified oversupply of retail floorspace together with substantial vacant floorspace (including in the primary shopping area). This position is not unique to Lewisham and is reflected across for town centres in London and elsewhere in the UK.</p> <p>7.10 As a result of this permanent and irreversible shift in the retail sector there is a need for Lewisham to consolidate its existing town centre offer, rather than looking for substantial expansion, if the Council’s aspiration for maintaining the viability of the town centre is be achieved. The creation of substantial new retail floorspace when there is no demand, will simply duplicate the existing offer, diluting Lewisham’s overall offer, and will not improve the overall offer.</p> <p>7.11 The London Plan includes a historic definition of a Metropolitan Town Centre. It serves wide catchments which can extend over several boroughs and into parts of the Wider South East, typically containing at least 100,000 sqm of retail, leisure and service floorspace. The evidence</p>		
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			<p>base for the Reg 18 Plan does not yet support such a position for Lewisham town centre in meeting the Council’s objective of achieving metropolitan status. The Council’s aspiration was to achieve Metropolitan Town centre status by 2026. This has now been pushed back in the Reg 18 Local Plan to 2040. At the same time the Council’s town centre floorspace growth forecasts have reduced significantly over the past decade, and it is not expected that these will improve over the life of the development plan.</p> <p>7.12 Given the fundamental change in the retail sector it is necessary to rethink how Lewisham town centre moves forward over the Plan period, and how future growth can be secured. This needs to be reflected in the Reg 18 Plan. It is no longer viable or appropriate to seek to achieve Metropolitan status based purely on increasing retail floorspace within Lewisham town centre – as was the approach advocated by adopted local planning policy. In any event, such an approach is not advocated by strategic policies, or supported by the evidence base.</p> <p>7.13 The London Plan identifies that the ‘potential’ for Lewisham to become a town centre of Metropolitan importance is linked to its function and population. Specifically, the London Plan identifies significant residential developments around the town centre coming forward, such as Lewisham Gateway, and the arrival of the Bakerloo line at Lewisham Interchange as factors that could contribute to elevating Lewisham’s status. Significantly, the London Plan does not explicitly refer to the need for additional floorspace, but the creation of a ‘high performing’ and ‘vibrant’ retail hub.</p>		
QUOD (Landsec obo - Lewisham Shopping Centre)	1 2 3 3 3	OL 01 EC 11 LCA LCA SA 01 LCA SA 02	<p>7.14 Within this context, to deliver the ambition for Metropolitan status, we consider that the following adjustments would assist the Council in the soundness of the plan making process.</p> <ul style="list-style-type: none"> - The Reg 18 Plan should conform to the London Plan and refer to the ‘potential’ for Metropolitan classification (OL1; EC11; Chapter 14; LCA1; LCA2). - The Reg 18 Plan should conform to the London Plan and align itself with the qualitative growth aspirations set out in paragraph 2.1.19 - further growth supported by the arrival of the Bakerloo line at Lewisham Interchange; enhanced access to central London; encourage the delivery of employment, leisure, service and community uses that serve the local and sub-regional population; public realm and environmental enhancements; surrounding employment, mixed-use and residential re-developments; the continued transformation of Lewisham into a high performing and vibrant retail hub; with excellent leisure services. - The Reg 18 Plan should refer to the need to apply the London Plan Annex 1 definition of Metropolitan Town Centre flexibly to reflect the changing nature of town centres. The forecast role and function of town centres is unlikely to relate to traditional numeric definitions of floorspace quantum’s, rather one based on public transport accessibility, retail performance and vibrancy – as acknowledged in the London Plan. More floorspace is not always better as the Mayor of London reports in his ‘High Streets and Town Centres Adaptive Strategies’ (2019). 	Agree that the redevelopment of Lewisham Shopping Centre will act as a catalyst. The approach taken in the Local Plan is in conformity with the London Plan, that identifies Lewisham as a having the potential to become a Metropolitan Centre in the future.	Local Plan amended to expand upon how the town centre will evolve to become Metropolitan status.

			<ul style="list-style-type: none"> - The outcomes that are secured through investment in a town centre such as jobs, homes, businesses, health and wellbeing, safety, permeability, building beautiful, carbon reduction, accessibility, culture, happiness and urban greening are likely to become the new ingredients for success and ambition of potential Metropolitan status. - The Council should work with the GLA to revise the current definition of Metropolitan town centres to reflect their changing nature. There is a clear ambition to adapt, survive and thrive. - The Reg 18 Plan should support the consolidation of retail floorspace as an objective which aids vitality and viability and which can achieve the wider ambition of Metropolitan status. <p>7.15 The future of Lewisham Shopping Centre is clearly a catalyst to achieving these outcomes as the largest most central site in Lewisham town centre. Landsec is keen to work proactively with the Council in seeking to achieve the aspirations of growth in a flexible and deliverable way.</p>		
GHL (Leegate) Limited (Frank Knight obo)	2	EC 12	<p><i>Relates to Part 3, LEA SA 03</i></p> <p>Policy EC12 (Location of new town centre development) promotes a town centre approach. GHL broadly supports this approach but requests that these policies be amended to reflect the flexibility envisaged by the new Use Class E, which effectively removes the Council’s ability to control changes of use within Use Class E. It is accepted that with the changes to the Use Class Order and notably through the introduction of Use Class E which permits the change of use from existing retail floorspace to other commercial uses. These changes were introduced to enable flexibility required for businesses to respond to the COVID-19 pandemic, it’s impacts or benefits aren’t yet fully understood in light of national lockdowns, but should be supported to maintain town centre viability and viability, alongside other ‘main town centre uses’. Therefore, planning policies need to promote flexibility of land uses, and support other ‘town centre uses’ within Lewisham’s town, district and local centres.</p>	Noted.	Local Plan amended to reflect and respond to changes to the Use Class Order, including the new Class E.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	EC 12	<p><i>EC12</i></p> <p>11.16Whilst not directly related to the shopping centre Policy EC12 refers to demonstrating a ‘need’ for town centre floorspace. There is no longer any policy requirement to demonstrate need for retail and leisure proposals. The wording of Policy EC12 should be revised to reflect this.</p>	Noted.	This policy has been removed from the plan to make it more concise
Freeths LLP (K/S Lewisham obo)	2	EC 13	K/S welcomes Policy EC13 relating to optimising the use of town centre land and floorspace. When assessed against this draft policy, the Site is well-suited to redevelopment to contribute towards the strategic needs of the Town Centre.	Support noted.	No change.
GHL (Leegate) Limited (Frank Knight obo)	2	EC 13	<p><i>Relates to Part 3, LEA SA 03</i></p> <p>Policy EC13 (Optimising the use of town centre land and floorspace) adds that development proposals should optimise the use of land and floorspace within town centres by delivering new mixed-use schemes. GHL supports this ambition.</p> <p>Equally, while Lewisham’s town, district and local centres are the main retail, leisure and recreation destinations within the borough, they face a number of significant challenges, notably the changing nature of retail that has been hastened by the COVID-19 pandemic. GHL strongly supports the continued focus of retail, leisure and recreation development within district centres. However, it should be acknowledged that successful centres in a post pandemic world will</p>	Support noted. The draft Local Plan is considered to provide sufficient flexibility for a wide range of uses to support town centre vitality and viability. It is acknowledged that changes to the plan are required to reflect new planning legislation.	Local Plan amended to reflect and respond to changes to the Use Class Order, including the new Class E.

			<p>need to be more than just retail focused with an appropriate balance struck with other town centre uses.</p> <p>GHL also supports the Council’s remarks that the diversification of uses in Lewisham’s town, district and local centres, including where appropriate residential development, will be encouraged. GHL welcomes the Council’s reference to diversification and highlights the important role that mixed-use development will perform in the evolution of Lee Green District Centre, including the role of complementary uses in securing the vitality of the centre. These complementary uses, and other main town centre uses, will perform a key role in responding swiftly to the changing economic climate and occupier demands, ensuring the long-term vitality and viability of Lee Green District Centre.</p>		
QUOD (Landsec obo - Lewisham Shopping Centre)	2	EC 13	<p><i>EC13</i></p> <p>11.17Policy EC13 should be redrafted so that it does not apply to site allocations.</p> <p>11.18Policy EC13 ‘Optimising the use of town centre land and floorspace’ (B) advises that proposals for new mixed-use development, including development involving the expansion, reuse or reconfiguration of existing floorspace will be considered having regard to a number of criteria. This includes the role and function of the centre, and the impact on town centre vitality and viability. The thrust of this policy is inconsistent with Government advice which recognises the need for greater flexibility in the reuse of town centre floorspace. It is also inconsistent with NPPF paragraph 86 (sequential test) and 89 (retail impact) which omits proposals which are in accordance with an up-to-date local plan. Part (B) should not apply to site allocations.</p> <p>11.19Part (C) appears overly restrictive and inflexible. National policy recognises that residential development often plays an important role in ensuring the vitality of centres, and residential development should be encouraged. Residential development should be encouraged to enhance the vitality and viability of town centres.</p> <p>11.20Within this context, we believe that draft Policy EC13 is not justified, effective or consistent with national policy, and EC13B should be deleted and re-drafted.</p>	<p>11.17 Disagree</p> <p>11.18 The plan provides sufficient flexibility for town centres and proposals will be assessed through the Development Management process on a site by site basis with reference to the relevant policies and site allocations.</p> <p>11.19 Disagree</p> <p>11.20 Disagree. We are confident that the policy is in line with national policy and provides sufficient flexibility for our town centres.</p>	No change
Barratt London and the Church Commissioners (Avison Young obo)	2	EC 14	<p><i>Relates to Part 3, LCA SA 20</i></p> <p>Draft Policy EC14 Major and District Centres</p> <p>Part G of Draft Policy E14 resists residential units at ground floor level within town centres. Whilst we are supportive of the aspiration to create active frontages at ground levels within new development blocks, we highlight that such activation should not solely be delivered through ground level retail and/or commercial floorspace. Indeed, this could also be achieved through delivering a residential use at ground level which is complementary to other uses and may be the most suitable use to be brought forward in certain instances.</p> <p>We, therefore, request that Part G of this policy be amended to set out that the acceptability of ground floor residential use would be based on an assessment and consideration of site-specific circumstances.</p>	Noted.	Policy EC14 amended to clarify that in major and district centres positive frontages should be delivered in the wider town centre area, with active ground floor frontages in the Primary Shopping Area.
GHL (Leegate) Limited	2	EC 14	<p><i>Relates to Part 3, LEA SA 03</i></p> <p>Policy EC14 (Major and District Centres) states that proposals for residential units on the ground floor level or below, both within Primary Shopping Areas and the</p>	Disagree, it is appropriate to designate the majority of Leegate	policy EC 14 has been amended to clarify that retail use only

(Frank Knight obo)			<p>wider town centre area, are inappropriate and will be strongly resisted. Annex 2 Proposed Changes to the adopted Policies Map Document (December 2020) shows that the Lewisham Local Plan Review proposes to change and increase the area of the Primary Shopping Area to include the majority of the Leegate Shopping Centre regeneration site.</p> <p>GHL welcomes the continued emphasis placed on Lewisham’s town, district and local centres as the focus for future development within the borough. However, it is strongly contended that the area proposed to be allocated as a Primary Shopping Area within the Site is not justified. The increased area covers a number of existing non-retail, commercial and community uses. Therefore, the primary shopping area boundary should be amended to cover areas where retail development is and should be directed.</p> <p>Furthermore, GHL does not agree that residential units should be resisted at ground floor in the Primary Shopping Area and wider town centre area. Residential development performs an important role in securing the long-term viability and vitality of a town centre, by increasing its permanent population. The delivery of housing alongside town centre uses needs to be considered on a site-by-site basis, as to appropriate level of integration.</p> <p>As such, GHL respectfully requests that the proposed Primary Shopping Area boundary is amended to remove the areas at the Site which are not currently in retail use and that proposed Policy EC14 removes the overly restrictive policy requirement for the Primary Shopping Area and wider town centre area to allow sufficient flexibility and to ensure residential development is supported, enabling appropriate integration.</p>	<p>District Centre as a Primary Shopping Area for the following reasons:</p> <ul style="list-style-type: none"> • The town centre is currently comprised of retail mostly. • Leegate town centre is planned for comprehensive regeneration. • There is no master plan for the town centre at present. 	<p>relates to ground floor level as well as providing greater flexibility through applying a 50% threshold with regards to retail use. An updated retail study has informed this policy approach</p>
QUOD (Landsec obo - Lewisham Shopping Centre)	2	EC 14	<p><i>EC14</i></p> <p>11.21Policy EC14 ‘Major and District Centres’ establishes policies for the Primary Shopping Areas, the locations where retail uses are concentrated. Part (C) seeks to ensure that in Lewisham major town centre, development proposals should ensure that <i>Class A1</i> (retail) uses in Primary Shopping Areas are maintained at a minimum of 50 per cent, as a proportion of all units. The policy sets out 6 exceptions to this. We would welcome clarification from the Council that this relates to ground floor units and / or floorspace. This part of the policy will also require revision to refer to the Government’s Use Classes Order revision (Class E Commercial, Business and Service uses) which should replace reference to Class A1.</p> <p>11.22Part (G) of the policy stipulates that proposals for residential units on the ground floor level or below, both within the Primary Shopping Areas and the wider town centre area, are inappropriate and will be strongly resisted. Such an approach provides little flexibility in the reuse or redevelopment of underutilised or vacant floorspace, is inconsistent with the position now being adopted by Government, and the NPPF. We therefore recommend that Criterion G is removed, or excludes strategic development coming forward as part of a site allocation.</p>	Noted	<p>policy amended to clarify that retail use only relates to ground floor level and provides greater flexibility by applying a 50% threshold with regards to retail use, which has been informed by an updated retail study</p>
Tetra Tech Planning (John Lyon’s Charity obo)	2	EC 16	<p>Policy EC16 should also clarify that the loss of Class A1 retail uses would also be accepted where this is supported by a Site Allocation.</p>	<p>Noted. The Local Plan will be amended to reflect changes to planning legislation, which provide</p>	<p>Local Plan amended to reflect and respond to changes to the Use Class</p>

				more flexibility for changes between Class E uses. Site allocations make provision for appropriate main town centre uses.	Order, including the new Class E.
McDonald's Restaurants Ltd (Planware Ltd obo)	2	EC 17	<p>Planware Ltd on behalf of McDonald's Restaurants Ltd</p> <p>Objection Response to Lewisham Local Plan Main Issues and Preferred Approaches Jan 2021</p> <p>Policy EC17 – Concentration of uses</p> <p>1 Introduction</p> <p>1.1 We have considered proposed Policy EC17 Concentration of uses – with regard to the principles set out within the Framework. We fully support the policy's aim of promoting healthier living and tackling obesity. However, the proposed policy approach is unsound and fails to provide an evidence-based way of achieving the policy's objective. It has also been found unsound by several planning inspectors. It is too restrictive and prevents local planning authorities from pursuing more positive policy approaches. The London Borough of Waltham Forest has had such a policy in place for over a decade and its application has proven ineffective in tackling obesity to date.</p> <p>1.2 Within these broad points we have the following policy objections to draft Policy EC17:</p> <p>A. The 400m exclusion zone is inconsistent with national planning policy</p> <p>B. The policy is inconsistent, discriminatory and disproportionate.</p> <p>C. Examination of other plans have found similar policy approaches to be unsound.</p> <p>D. There needs to be further exploration into policies that are more positive, have a reputable evidence base and that comply with the Framework.</p> <p>1.3 1.3 In summary, Planware Ltd consider there is no sound justification for a policy such as Policy EC17, which imposes a blanket ban on restaurants that include an element of hot food takeaway "located at least 400 metres away from the boundary of a primary or secondary school".</p> <p>However, as stated in the opening paragraph, Planware Ltd supports the aim of promoting healthier living and tackling the obesity crisis. We acknowledge that planning can have a role in furthering these objectives. We would therefore welcome and support any studies between obesity and their relationship with development proposals, including examination of how new development can best support healthier lifestyles and tackling the obesity crisis. When a cogent evidence base has been assembled, this can then inform any appropriate policy response. This has still not emerged.</p> <p>1.5 Given the lack of any clear agreement between experts on the indices of obesity or poor health, analysing the evidence is a necessary part of this objection by way of background. This will all be highlighted in the below text.</p> <p>2 Contribution of McDonald's UK to the United Kingdom</p> <p>2.1 This section of the objection sets out some background context relating to McDonald's own business, its contribution to United Kingdom, and information</p>	<p>Noted. The 400m exclusion away from primary and secondary schools is established by the London Plan policy E9. The additional local thresholds in town and local centres are established by the Council's adopted Development Management DPD, which are proposed to be carried over into the Local Plan. The Council considers there is sufficient evidence to merit retaining the policy.</p>	<p>Local Plan amended to refer to 400m exclusion zone from entrances and exits of existing or proposed primary or secondary school (rather than boundary) in accordance with the London Plan.</p>

		<p>on the nutritional value and healthy options of the food that it offers in its restaurants. This evidence is relevant to understanding the adverse and unjustified impacts of the blanket ban approach proposed under draft Policy EC17.</p> <p>Economic and Environmental Benefits</p> <p>2.2 The first store in the United Kingdom was first opened in 1974 in Woolwich, London. The store is still opened and was interestingly the 3,000th store across the world.</p> <p>2.3 With over 36,000 McDonald’s worldwide, it operates in over 100 countries and territories. Approximately 120,000 people are employed by McDonald’s UK, compared to just over 1 million employees worldwide.</p> <p>2.4 McDonald’s and its franchisees have become important members of communities in the United Kingdom: investing in skills and developing our people, supporting local causes and getting kids into football.</p> <p>2.5 Nationally, the company operates from over 1,300 restaurants in the UK. Over 80% of restaurants are operated as local businesses by franchisees, that’s around 1,100 franchised restaurants.</p> <p>2.6 McDonald’s is one of few global businesses that continues to anchor itself in high streets and town centres across the United Kingdom. Not just serving the general public but creating jobs and seeking to improve the communities around them.</p> <p>2.7 All McDonald’s restaurants conduct litter picks covering an area of at least 100 metres around the site, at least three times a day, picking up all litter, not just McDonald’s packaging.</p> <p>2.8 McDonald’s is a founding member of the anti-littering campaign, Love Where You Live. As part of this, our restaurants regularly organise local community litter picks. The campaign has grown and in 2017, 430 events took place across the UK with around 10,000 volunteers involved. Since the campaign started, 2,600 events have taken place with around 80,000 volunteers involved.</p> <p>2.9 McDonald’s restaurants are operated sustainably. For example, their non-franchised restaurants use 100% renewable energy, combining wind and solar and use 100% LED lighting which means we use 50% less energy than fluorescent lighting. All of their used cooking oil is converted into biodiesel for use by delivery lorries. Their entire fleet of lorries runs on biodiesel, 40% of which comes from McDonald’s cooking oil. This creates over 7,500 tonnes fewer CO2 emissions than ultra-low sulphur diesel.</p> <p>2.10 All new McDonald’s restaurants in the United Kingdom are fully accessible and we are working toward delivering this same standard for all existing restaurants.</p>		
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		<ul style="list-style-type: none">• Reduced the saturated fat content of the cooking oil by 83%;• Signed up to the Trans Fats pledge as part of the Government’s “Responsibility Deal”;• The cooking oil has been formulated to form a blend of rapeseed and sunflower oils to reduce levels of TFA to the lowest level possible;• They have completely removed hydrogenated fats from the vegetable oils;• Reduced the total fat in the milkshakes by 32% per serving since 2010;• Organic semi-skimmed milk is used in tea/coffee beverages and in Happy Meal milk bottles, with lower saturated fat levels compared with full fat variants. <p><i>Sugar</i></p> <p>2.26 Dietary carbohydrates include sugars, starches and fibre, and each has approximately 4kcal/g.</p> <p>2.27 The Scientific Advisory Commission on Nutrition (SACN) currently recommends that approximately 50% of total dietary energy intake should be from carbohydrates (SACN Report, 2015). In 2015 SACN recommended that the dietary reference value for fibre intake in adults be increased to 30g/day (proportionally lower in children) and that the average intake of “free sugars” (what used to be referred to as non-milk extrinsic sugars) should not exceed 5% of total dietary energy, which was in keeping with the World Health Organisation (WHO) recommendations.</p> <p>2.28 Current average intake of free sugars far exceeds current recommendations, and excess intake is associated with dental issues and excess calorie intake which can lead to weight gain and obesity.</p> <p>2.29 Over the last 10 years our reformulation work has resulted in 787 tonnes less sugar across our menu in 2017 versus 2007. What have McDonald’s done?</p> <ul style="list-style-type: none">• Reducing the sugar in our promotional buns, this removed 0.6 tonnes of sugar.• Their Sweet Chilli Sauce has been reformulated to reduce sugar by 14% this equates to 155 tonnes of sugar removed• Their Festive Dip has removed 4 tonnes of sugar• Their famous McChicken Sandwich Sauce has reduced in sugar 45%• Their Tomato Ketchup has reduced in sugar by 20% which equates to 544 tonnes of sugar removed from the system• Their Chucky Salsa has reduced in sugar by 28%• Since 2016 they have reduced the sugar content of Fanta by 54%• The Toffee Syrup in their Toffee Latte has been reformulated to remove 20% of the sugar• McDonald’s have also reformulated their Frozen Strawberry Lemonade this has led to 8% sugar reduction per drink <p>Salt</p> <p>2.30 A number of health-related conditions are caused by, or exacerbated by, a high salt diet. The strongest evidence links high salt intake to hypertension, stroke and heart disease, although it is also linked with kidney disease, obesity and stomach cancer (Action on Salt website).</p>		
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			<p>2.31 Salt is often added to food for either taste or as a preservative, and in small quantities it can be useful. Adults in the UK are advised not to exceed 6g of salt per day, but the average intake at a population level is consistently higher than this.</p> <p>2.32 Salt does not directly lead to obesity; however, it does lead to increased thirst, and not everyone drinks water or calorie-free “diet” beverages. If our thirst increases and leads to increased consumption of calories from extra fluid intake, then this may lead to increased weight and obesity. 31% of fluid drunk by 4-18-year-old children is sugary soft drinks (He FJ et al, 2008), which has been shown to be related to childhood obesity (Ludwig DS et al, 2001).</p> <p>2.33 What have McDonald’s done?</p> <ul style="list-style-type: none">• The salt content across the UK menu has been reduced by nearly 35% since 2005;• Customers can ask for their fries to be unsalted;• The salt added to a medium portion of fries has been reduced by 17% since 2003;• The average Happy Meal now contains 19% less salt than in 2006• Chicken McNuggets contain 52% less salt than in 2003. <p>2.34 The process continues. McDonald’s have recently made the following changes to further improve their menu</p> <ul style="list-style-type: none">• Making water the default drink in the Happy Meals;• Making it easier for people to understand the existence of a wide range of under 400 and 600 calorie meal options that are available. <p>Third Party Opinions of McDonald’s</p> <p>2.35 McDonald’s regularly receive supportive comments from independent third parties.</p> <p>2.36 Professor Chris Elliott, of the Department for Environment, Food & Rural Affairs’ independent Elliott Review into the integrity and assurance of food supply networks: interim report, December 2013: <i>“Each supply chain is unique, showing that there is no single approach to assuring supply chain integrity. The review has seen many examples of good industry practice that give cause for optimism. There is not space within this final report to reference all the good industry practices but those that have stood out include McDonald’s and Morrisons.”</i></p> <p>2.37 Jamie Oliver, the TV chef, food writer and campaigner speaking in January 2016 at the Andre Simon Food & Drink Book Awards to the Press Association: <i>“Everyone always liked to poke at McDonald’s. McDonald’s has been doing more than most mid and small-sized businesses for the last 10 years. Fact. But no one wants to talk about it. And I don’t work for them. I’m just saying they’ve been doing it - 100% organic milk, free range eggs, looking at their British and Irish beef.”</i></p>		
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			<p>2.43 This partnership has seen them support over one million players and volunteers. In London since 2014, more than 1,000 people have attended their Community Football Days and have distributed 3,328 kits to accredited teams in the Capital. Of the 171 McDonald’s restaurants within the M25, approximately 88 are twinned and actively supporting a local football club. This serves as an example of the company’s willingness to confront the obesity crisis by a multitude of different approaches.</p> <p>2.44 McDonald’s do this work because increasing standards will ultimately create a better experience for young footballers, leading to increased participation and retention of children and young people in sport.</p> <p>2.45 Their Community Football programme helps to increase participation at all levels. McDonald’s remain absolutely committed to it and are in the final stages of planning a new programme for future years.</p> <p>Marketing</p> <p>2.46 As a business, McDonald’s are committed to ensuring their marketing will continue to be responsible and will be used as a positive influence to help our customers make more informed choices.</p> <p>2.47 McDonald’s recognise that marketing has a part to play in influencing customers’ choices. They comply, and go beyond, the UK’s stringent regulations on marketing to children and use their marketing to help families understand more about the range of food options they have to offer.</p> <p>2.48 McDonald’s never market products classified as high in fat, salt or sugar to children in any media channel, at any time of the day. They are committed to ensuring that marketing is always responsible as well as informative, and that it reinforces positive food messages.</p> <p>2.49 In addition, they go beyond the regulations in a lot of cases. For example, when advertising a Happy Meal, they only ever do so with items such as carrot sticks, a fruit bag, milk or water to ensure McDonald’s are not marketing HFSS food to children. This has been done voluntarily since 2007.</p> <p>Summary</p> <p>2.50 In the light of the above it is clear that McDonald’s restaurants offer the district considerable and substantial economic benefits, are supportive of active and healthy lifestyles. They also enable customers to make informed, healthy decisions from the wide-ranging menu options available. It is important that this is acknowledged, given the assumption in proposed Policy EC17, that all hot food takeaways uses should fall under a blanket ban if within 400m of the boundary of a primary or secondary school. Given the policy aim – which McDonald’s supports – of promoting healthier lifestyles and tackling obesity, other alternatives would be more effective than allowing blanket bans in school areas, which in turn will have negative land use consequences.</p> <p>We turn now to the main points of the objection.</p>		
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			<p>3 The 400m Exclusion Zone is Inconsistent with National Policy</p> <p>Introduction</p> <p>3.1 This section of the objection considers the proposed policy against national policy. The lack of evidence to support the policy is also discussed in the next section.</p> <p>3.2 National policy contains no support for a policy approach containing a blanket ban or exclusion zone for hot food takeaways (or indeed any other) uses. Such an approach conflicts sharply with central planks of Government policy such as the need to plan positively and support economic development, and the sequential approach that seeks to steer town centre uses – which include hot food takeaways - to town centres.</p> <p>3.3 Planware Ltd feel that restricting hot food takeaways within 400m of the boundary of a primary or secondary school is in direct conflict with the framework as the approach is not positive, justified, effective or consistent. The policy, as currently worded, provides no flexibility in accordance with town centre sites, thus conflicting with the sequential approach. These points are further explained in this objection.</p> <p><i>Practical Impacts</i></p> <p>3.4 The practical impacts on a 400m exclusion zone from the boundary of a local primary or secondary school would have unacceptable negative land use consequences.</p> <p>3.5 Consideration should be given to school rules in terms of allowing children outside of the school grounds at lunch times. This is overly restrictive on secondary schools, where a some of pupils will be legally classed as an adult and have access to a car. Additionally, primary school children are unlikely to be unsupervised before and after school and do not have access outside of school at lunchtimes.</p> <p>3.6 No consideration is given to how the 400m is measured from the boundary. Guidance should be provided as to whether this is a straight line or walking distance, as this can vary greatly.</p> <p>3.7 The Framework does not support the use of planning as a tool to limit people’s dietary choices. In addition to this, other E class uses can provide unhealthy products, therefore, there is limited justification for the proposed Policy EC17 to focus exclusively upon hot food takeaways.</p> <p><i>Conflict with National Policy</i></p> <p>3.8 The local policy team do not appear to have fully assessed the potential impact of the policy. It essentially creates a moratorium against hot food takeaways uses leaving limited reasonable space for them to locate.</p> <p>3.9 Restricting the location of new hot food takeaway proposals through a 400m exclusion zone is not a positive approach to planning, thus failing to comply with the Framework.</p>		
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		<p>3.10 The suggested restriction within proposed Policy EC17, takes an ambiguous view of hot food takeaways in relation to the proximity to all primary and secondary schools. The policy would apply an over-generic approach to restrict hot food takeaway development with little sound planning reasoning or planning justification. This is contrary to paragraph 11 of the Framework that advises authorities to positively seek opportunities to meet development needs of their area.</p> <p>3.11 Thus, is consistent with paragraph 80-81 of the Framework.</p> <p>3.12 Para 80 states: <i>“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.”</i></p> <p>3.13 Para 81 states: Planning policies should: <i>“a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration; b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”</i></p> <p>3.14 As explained in this objection, there is a lack of evidence to demonstrate the link between fast food, school proximity and obesity. The need for evidence is emphasised in paragraph 31 of the Framework that states that each local plan should be based on adequate, up-to-date and relevant evidence. Neither the policy nor the supporting text address this point. Policy needs to be based on evidence and the lack of evidence should highlight a red flag concerning the draft policy.</p> <p>3.15 The policy is likely to be damaging to the district’s economy due to the fact that it is restricting hot food takeaways to an unprecedented level without regard to the local area or the economy.</p> <p>3.16 The Framework cannot be interpreted to provide generic restrictions on a particular use class. There is no basis for such a blanket ban approach in the Framework or Planning Practice Guidance. In fact, the Planning Practice Guidance emphasises that planning authorities should look at the specifics of a particular proposal and seek to promote opportunity rather than impose blanket restrictions on particular kinds of development. In the section on “Health and Wellbeing”:</p>		
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		<p>3.17 Paragraph: 002 (Reference ID: 53-002-20140306) states that in making plans local planning authorities should ensure that: <i>“opportunities for healthy lifestyles have been considered (eg. planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical activity, and promotes access to healthier food, high quality open spaces, green infrastructure and opportunities for play, sport and recreation);”</i></p> <p>3.18 Paragraph: 006 (Reference ID: 53-006-20170728) says that a range of criteria should be considered, including not just proximity to schools but also wider impacts. It does not support a blanket exclusion zone. Importantly, the criteria listed are introduced by the earlier text which states: <i>“Local planning authorities can have a role in enabling a healthier environment by supporting opportunities for communities to access a wide range of healthier food production and consumption choices.”</i></p> <p>3.19 The above guidance serves to emphasise why it is important to look at particular proposals as a whole, rather than adopting a blunt approach that treats all proposals that include a Sui Generis use as being identical</p> <p>4. The Policy is Inconsistent, Discriminatory and Disproportionate</p> <p>4.1 The policy aims to address obesity and unhealthy eating but instead simply restricts new development that comprises an element of Sui Generis use. Yet Class E retail outlets and food and drink uses can also sell food that is high in calories, fat, salt and sugar, and low in fibre, fruit and vegetables, and hot food from a restaurant unit can be delivered to a wide range of locations, including schools. This means that the policy takes an inconsistent approach towards new development that sells food and discriminates against operations with an Sui Generis use. It also means that the policy has a disproportionate effect on operations with an Sui Generis use.</p> <p>4.2 The test of soundness requires that the policy approach is “justified”, which in turn means that it should be the most appropriate strategy when considered against the reasonable alternatives and based on proportionate evidence (paragraph 35 of the Framework).</p> <p>4.3 Given the objectives of the policy, it ought to apply equally to all relevant food retailers. It is unclear how the policy would be implemented and work in a real life scenario.</p> <p>4.4 The table below shows the kind of high calorie, low nutritional value food that can be purchased from a typical A1 high street retailer at relatively low cost. It is contrasted with the kind of purchase that could be made at a McDonald’s.</p> <p><i>LB Lewisham officer note: a table is included in the original representation. It shows high calorie food that can be purchased at a high street retailer.</i></p>		
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		<p>5.3 A systematic review of the existing evidence base by Oxford University (December 2013), funded by the NHS and the British Heart Foundation ‘did not find strong evidence at this time to justify policies related to regulating the food environments around schools.’ It instead highlighted the need to ‘develop a higher quality evidence base’.</p> <p>5.4 The range of US and UK studies used to support many beliefs about obesity, including the belief that the availability of fast food outlets increased obesity, was comprehensively reviewed in papers co-written by 19 leading scientists in the field of nutrition, public health, obesity and medicine. Their paper “Weighing the Evidence of Common Beliefs in Obesity Research” (published in the Critical Review of Food, Science and Nutrition (Crit Rev Food Sci Nutr. 2015 December 6; 55(14) 2014-2053) found that the current scientific evidence did not support the contention that the lack of fresh food outlets or the increased number of takeaway outlets caused increase obesity (see pp16-17 of the report).</p> <p>5.5 There appears to have been no critical assessment of whether the underlying evidence supports the proposed policy approach.</p> <p>5.6 In this context, it is important to consider the evidence from the Borough of Waltham Forest, which introduced a school proximity policy in 2008 – about a decade ago. Over that period, the Public Health England data for the borough shows that there has been no discernible impact on childhood obesity rates – with these worsening in recent years. The borough’s Health Profile for 2017 records childhood obesity (year 6) at 26.1% up from 20.3% in 2012, the year London hosted the Olympic Games.</p> <p>5.7 While it is accepted that the causes of obesity are complex, it is clear that the school exclusion zone policy had no discernible effect in Waltham Forest. More research and investigation is needed before such a policy approach can be justified by evidence.</p> <p>6 Similar Policies Have Been Found Unsound When Promoted in Other Plans</p> <p>6.1 The lack of evidence between proximity of takeaways to local schools and its impact on obesity has been confirmed in a number of planning decisions.</p> <p>6.2 In South Ribble the Planning Inspectorate raised concerns about a similar 400m school proximity restriction on fast food, stating ‘the evidence base does not adequately justify the need for such a policy’, and due to the lack of information, it is impossible to ‘assess their likely impact on the town, district or local centres’.</p> <p>6.3 Similarly, research by Brighton & Hove concluded that ‘the greatest influence over whether students choose to access unhealthy food is the policy of the individual schools regarding allowing students to leave school premises during the day’.</p> <p>6.4 The recent Inspectors response to the London Borough of Croydon (January 2018) regarding a similar prohibition on hot food takeaways, (where a similar campaign to persuade takeaway proprietors to adopt healthy food options</p>		
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		<p>existed) confirmed that the councils own ‘healthy’ plans would be stymied by the proposed policy, as would purveyors of less healthy food. The policy failed to distinguish between healthy and unhealthy takeaway food, and “confounds its own efforts to improve healthiness of the food provided by takeaway outlets” and failed to “address the demand for the provision of convenience food”. The Inspector concluded that because the reasons for the policy do not withstand scrutiny, they must be regarded as unsound.</p> <p>6.5 The inspector at Nottingham City Council stated “<i>There is insufficient evidence to support the link between childhood obesity and the concentration or siting of A3, A4 and A5 uses within 400m of a secondary school to justify the criterion of policy LS1 that proposals for A3, A4 and A5 uses will not be supported outside established centres if they are located within 400m of a secondary school unless it can be clearly demonstrated that the proposal will not have a negative impact on health and well-being the criterion and justification should therefore be deleted/amended</i>”.</p> <p>6.6 The inspector at Rotherham stated “<i>Policy SP25 sets out various criteria against which proposals for hot food takeaways will be assessed. One of the criteria is designed to prevent hot food takeaways within 800 metres of a primary school, secondary school or college when the proposed site is outside a defined town, district or local centres. Having carefully considered the material before me and the discussion at the Hearing I do not consider there is sufficient local evidence to demonstrate a causal link between the proximity of hot food takeaways to schools and colleges and levels of childhood obesity. Although I accept that levels of childhood obesity need to be tackled by both local and national initiatives I do not consider there are sufficient grounds at the present time to include this particular aspect of land use policy in the RSPP</i>”.</p> <p>6.7 In Guildford, the inspector stated “<i>Finally, the submitted Plan contains a requirement common to Policy E7 Guildford town centre, E8 District Centres and E9 Local Centres and isolated retail units that resists proposals for new hot food takeaways within 500 metres of schools. However, the evidence indicates that childhood obesity in Guildford is lower than the average for England. Childhood obesity may be a product of a number of factors, not necessarily attributable to takeaway food; takeaways often sell salads as well as nutritious foods; not all kinds of takeaway food are bought by children; children have traditionally resorted to shops selling sweets and fizzy drinks, which would be untouched by the policy; and the policy would have no bearing on the many existing takeaways. In this context there is no evidence that the requirement would be effective in safeguarding or improving childhood health. It would be an inappropriate interference in the market without any supporting evidence and would therefore be unsound</i>”.</p> <p>6.8 The proposed 400m school exclusion zone and restriction of hot food takeaways developments in ‘over-concentrated areas are two policies that we cannot agree to. The proposed approach is in direct conflict with the Framework. As mentioned in the above text, there is enough reputable information to demonstrate a current evidence base that fails to demonstrate the link between fast food and school proximity. There is also a clear absence of evidence to suggest restricting hot food takeaway use in ‘over-concentrated’ outside of town</p>		
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		<p>and district centres will lead to healthier lifestyles or influence an individual’s dietary choice.</p> <p>7 Alternative Approaches</p> <p>7.1 Planware Ltd considers there is no sound justification for point C of the proposed Policy EC17 which imposes commercial restrictions on restaurants that include an element of hot food takeaways within a 400m radius from a primary or secondary school. Point C should therefore be removed to provide consistency and to abide by the Framework.</p> <p>7.2 Planware Ltd would welcome and support proposals for a wider study of the causes of obesity and their relationship with development proposals, including examination of how new development can best support healthy lifestyles and the tackling of obesity. When a cogent evidence base has been assembled, this can then inform an appropriate policy response. That time has not yet been reached.</p> <p>7.3 It is considered until such a time has been reached, point C should be removed.</p> <p>8 Conclusion</p> <p>8.1 McDonald’s supports the policy objective of promoting healthier lifestyles and tackling obesity. It does not consider that the proposed Policy EC17 is a sound way of achieving those objectives. The underlying assumption in the policy is that all hot food takeaways (and any restaurants with an element of takeaway use) are inherently harmful to health. In fact, this is not supported by evidence. McDonald’s own business is an example of a restaurant operation which includes takeaway but which offers healthy meal options, transparent nutritional information to allow healthy choices, and quality food and food preparation. The business itself supports healthy life styles through the support given to its staff and support given to football in the communities which the restaurants serve.</p> <p>8.2 In addition, the policy fails to acknowledge the wider benefits that restaurants can have, including benefits relevant to community health and wellbeing. McDonald’s own business is an example of a restaurant operation that supports sustainable development through the use of renewable energy, the promotion of recycling, the use of energy and water saving devices. The economic benefits of its restaurants in supporting town centres and providing employment opportunities and training are substantial, and important given that improved economic circumstances can support improved health.</p> <p>8.3 The policy fails to acknowledge that food choices which are high in calories and low in nutritional value are made at premises trading with Class E consents and can be delivered from the latter. The policy makes no attempt to control these uses.</p> <p>8.4 For the reasons given in this objection the proposed policy is very clearly inconsistent with government policy on positive planning, on supporting economic development and the needs of businesses, on supporting town centres, and on the sequential approach. There is no justification in national</p>		
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			<p>policy for such restrictions to be applied to hot food takeaways. The effect of the policy had it existed in the past would have been to exclude restaurants such as McDonald’s from major commercial and tourist areas.</p> <p>8.5 For the reasons given in this objection the proposed policy lacks a credible evidence base, and similar policies have been found to be unsound by inspectors who have examined other plans. In the one London Borough that has had a similar policy, concerning a school exclusion zone, for around a decade (LB Waltham Forest). It has had no discernible effect on obesity levels, which have in fact increased since its introduction.</p> <p>8.6 Given the overall objective of improving lifestyles and lowering obesity levels, restrictive policy regarding hot food takeaway development is a narrow-sighted approach. There is no mention of other possible reasons behind the national high levels of obesity. To discriminate against hot food takeaways alone is worrying and using the planning system to influence people’s daily lifestyle choices is not acceptable.</p>		
Cockpit Arts (The Planning Lab obo)	2	EC 18	<p><i>Relates to Part 3, LNA SA 14</i></p> <ul style="list-style-type: none"> • CA is supportive of policy that recognises and seeks to protect and enhance creative and cultural uses within the borough. • We consider it vitally important to preserve and enhance the existing, distinctive cultural activities in Lewisham through <i>meaningful</i> designation of the Cultural Quarters. This represents an opportunity for Lewisham to retain and develop its rich cultural and creative identity, so much of which has been lost elsewhere in London; and support a meaningful legacy of its status as Borough of Culture 2022. • We strongly support the statement that “Cultural Quarters include Locally Significant Industrial Sites and it is vital that the functional integrity of the LSIS is secured and not compromised. • We endorse the protection the policy confers to creative (<i>not just</i>) arts-led institutions as development takes place around them and as they consider their own development. 	Support noted.	No change.
Tetra Tech Planning (John Lyon’s Charity obo)	2 2	Chapter 06 EC 18 Chapter 08	<p>Part Two – Managing Development</p> <p>Do you agree with the broad topic areas proposed to be covered in Part 2: Managing Development?</p> <p>Yes, the topic areas cover the key themes for any Local Authority in producing its Local Plan, however we consider that “Culture” should be dealt with alongside Heritage and not within the Economy topic.</p> <p>Heritage</p> <p>Do you agree that the Local Plan has identified all of the issues around heritage?</p> <p>A more comprehensive approach to Heritage would be to include those policies related to “Culture” (Policies EC18-EC22) within this topic area.</p>	Noted. It is acknowledged that there is overlap within the plan and some policy topic areas are cross-cutting, such as culture. However it has been included in the EC chapter for organisational purposes. The Local Plan should be read as a whole.	No change.
GHL (Leegate) Limited (Frank Knight obo)	2	EC 19	<p><i>Relates to Part 3, LEA SA 03</i></p> <p>Policy EC19 (Public houses) sets out a presumption in favour of the retention of public houses in Lewisham, consistent with London Plan Policy DC7 (Protecting public houses). The policy adds that development proposals involving the replacement or re-provision of a public house must ensure the replacement facility is of comparable character and quality as the existing public house and has an appropriate amount and configuration of floorspace to enable the continued viability of the public house. The supporting policy text states where</p>	Noted. Disagree. The Council considers that evidence should be provided to demonstrate that options to retain the existing public house in-situ have been considered prior to proposing a replacement	No change.

			<p>sites are redeveloped (including through comprehensive redevelopment), the priority is to retain pubs and keep them in situ.</p> <p>GHL recognises the need to protect public houses in London. However, it should be recognised that there will be instances where replacement or re-provision of a pub is necessary, and as long as the replacement facility is provided to ensure continued social, economic, or cultural viability and vitality will be retained, there should be no requirement to demonstrate that options have been considered to retain the pub in-situ. Clarification is sought on this approach.</p>	<p>facility. The policy is considered to provide sufficient flexibility to enable development to come forward where retention cannot be feasibly met.</p>	
Tavern Propco (Savills obo)	2	EC 19	<p><i>Relates to Part 3, LSA SA 11</i></p> <p>Emerging Policy EC19: Public Houses</p> <p>Emerging policy EC19 limits the loss of a public house that has heritage, economic, social or cultural value to the community, including through change of use or redevelopment, unless there is robust and authoritative evidence to demonstrate otherwise. Part A subsection (b) of this emerging policy requires redevelopment proposals to demonstrate that:</p> <p><i>“The public house is not financially viable and there is no reasonable prospect of the premises remaining in this use, or an alternative community use, in the foreseeable future as evidenced through attempts at different business models and management, and an active marketing exercise of a minimum continuous period of three-years”.</i></p> <p>Tavern Propco is supportive of the Council’s commitment to the protection and retention of public houses within Lewisham. However, it is considered that the restrictive and onerous nature of emerging Policy EC19 is incompatible with the post Covid-19 high street and viability of public houses.</p> <p>As the high street begins to recover from the effects of the Covid-19 Pandemic, the high street will go through a period of consolidation and rationalisation. This has already been seen, with some shops, retailers, restaurants and pubs not re-opening, or assessing their longer-term viability. As a result of the pandemic and the long period of closure, it is unfortunate that some pubs have already become or about to become unviable. Therefore, despite marketing attempts, the viable use of some pubs will never be achieved. Therefore, it is considered that the requirement for an active marketing exercise of three years is overly onerous and will leave pubs on the high street empty and falling into disrepair reducing the ability for certain pub sites to come forward for suitable redevelopment.</p> <p>Requested Amendment: Emerging Policy EC19 requires a minimum continuous marketing exercise of three years before an alternative use of the site can come forward. It may become apparent that another use of public house building could successfully and viably operate within these premises. In order to assist and accelerate the recovery of the High Street, it is requested that LBL amend Policy EC19 by removing the minimum marketing period for public houses of three years.</p>	<p>The Council considers that the marketing requirement whilst rigorous is proportionate given the policy objectives around the retention of public houses, evidence of loss of public houses over the years, and recognition they are community infrastructure in accordance with national planning policy.</p>	<p>No change.</p>
Artworks Creekside (Avison Young obo)	2	EC 19	<p><i>Relates to Part 3, LNA SA 16</i></p> <p>Draft Policy EC19 – Public houses</p> <p>Artworks Creekside has reviewed the draft Policy EC19 and notes that there is a presumption in favour of retention of public houses. The proposals retain the public house and any future planning application will be accompanied by robust</p>	<p>Noted. Disagree that Policy EC17.C should be deleted. However amendments will be made to ensure the policy regarding replacement facilities the</p>	<p>Local Plan policy EC17.C amended to make clear the focus is on high quality design and responding positively to local character.</p>

			<p>evidence on the viability of the current and future pub operation. The Birds Nest PH is a locally listed building – commentary is provided on the associated Policy elsewhere – and the Council’s requirement to ensure that development does not detract from the character and appearance of the building is noted.</p> <p>Policy EC19.C is noted and the requirement to provide an appropriate amount and configuration of floorspace to enable the continued viability of the public house is supported. However, the requirement to ensure the replacement facility is of a comparable character and quality is questioned, given that such an assessment is a subjective judgement against which no measurement can be made in planning terms. It is suggested that this is omitted.</p> <p>The post-amble has been reviewed and it appears inconsistent with the policy requirements. The post-amble notes that ‘<i>proposals will be required to demonstrate that they have considered all reasonable options for retaining the pub in situ</i>’. This is not part of the Policy. Only the loss of public house through the change of use or redevelopment has this requirement. The post-amble should be revised accordingly.</p> <p>Artworks Creekside note the commentary about marketing evidence requirement that are expected to be appended to the Local Plan and suggest that this should be applied only where the public house use is being lost, and not where the public house is being re-provided.</p>	<p>focus is on high quality design rather or ‘comparable character and quality’. This will address uncertainties and ambiguity around the implementation of the policy.</p> <p>Appendix amended to provide that flexibility on market requirements may be applied on a case by case basis.</p>	
GHL (Leegate) Limited (Frank Knight obo)	2	EC 20	<p><i>Relates to Part 3, LEA SA 03</i></p> <p>Lastly, Policy EC20 (Markets) remarks that development proposals should protect and seek to enhance existing markets and that all proposals for markets and market space must demonstrate that there will not be an unreasonable adverse impact on the amenity of adjoining and neighbouring properties, or have a detrimental effect on the functioning of the local road network. As much as GHL supports the principle of this policy, it is unclear as to what is defined as an ‘existing market’. If markets used to exist, but haven’t done so for years, is there justification to re-provide a market. Clarification is sought on this approach.</p>	Noted. Agreed that clarification will be useful.	Local Plan policy amended to clarify markets include those that are authorised or licenced for use.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	EC 20	<p>Markets</p> <p>11.23Draft policy EC20 ‘Markets’ seeks to protect and seek to enhance existing markets. Proposals for new markets or market space should be directed to appropriate town centre locations. Proposals for new development affecting existing markets within town centres will only be considered having regard to demonstrable demand and the impact on town centre vitality and viability. Landsec are supportive of this policy.</p>	Support is noted.	No change.
The Renewal Group (Carney Sweeney obo)	2	EC10 – EC17	<p><i>Relates to Part 3, LNA SA 08</i></p> <p>Policies EC10 – EC17 Town Centre Policies</p> <p>These policies need to be updated to have regard to the new Use Classes Order especially in relation to the new Use Class E and the imminent amended permitted development rights later this year. The Inspector considering the Westminster Local Plan in 2020 made clear the importance of this.</p>	Noted.	Local Plan has been amended to accord with changes to the Use Classes Order and permitted development rights.
QUOD (Landsec obo - Lewisham Shopping Centre)	-	Retail Evidence Base	<p><i>LB Lewisham officer note: Chapter 5 of the submitted response provides an in-depth analysis of the retail capacity needs of Lewisham Town Centre and a review of the retail evidence base.</i></p>	Following the Regulation 18 Consultation, the Council and Litchfields has prepared a	Local Plan amended to take account of the changes arising in town centres from the new Use Class E.

		<p>5.60 Although the Council published updated retail evidence in September 2019 (the LRCSU) to inform the Reg 18 Plan, there are substantial concerns regarding the robustness of the assessment undertaken.</p> <p>5.61 The LRCSU relies on a household telephone survey undertaken in November 2015. Such survey evidence is over five years old and fails to provide an up-to-date understanding of existing shopping patterns in the local area, or a robust basis to understand future retail capacity requirements, including those being promoted in the Reg 18 Plan. Given the age of the survey evidence only limited weight can be given to the findings of the LRCSU.</p> <p>5.62 Notwithstanding our concerns regarding the robustness of the survey evidence, the LRCSU relies on population and expenditure data published in 2015 and 2018 respectively. This data was published before the ongoing COVID-19 pandemic, which has accelerated the previously forecast fundamental shift in retailing, led largely by the growth of online shopping.</p> <p>5.63 A simple update of the LRCSU demonstrates that applying the latest data now available, this substantially reduces the retail capacity for additional floorspace in Lewisham town centre, particularly for comparison goods. Indeed, this assessment identifies there to be an oversupply of retail floorspace in the Town Centre, together with a high level of vacant floorspace.</p> <p>5.64 Central Government has recognised the need for flexibility due to the decline of the retail sector through the introduction of the new Class E use class, and proposals in respect of permitted development in relation to allowing the change of use from retail to residential without the need for planning permission.</p> <p>5.65 The recognised shift in the retail sector has major implications for retail town centres, and one that should be reflected by local planning policy in order to ensure that the Council’s approach to town centres is effective and justified.</p> <p>Future Leisure Needs</p> <p>5.66 Whilst the LRCSU provided revised retail capacity figures, this did not provide an up-to-date assessment of future leisure needs. As such, the most up-to-date assessment of future retail needs remains the Lewisham Retail Capacity Study 2017.</p> <p>5.67 The 2017 Study identified that there was an absence of a large multiplex cinema in the Borough, and that Lewisham town centre should be the focus for this (now proposed at Lewisham Gateway). The Study also concluded that Lewisham town centre is under provided for in terms of other commercial leisure uses, in particular the food and beverage (‘F&B’) sector.</p> <p>5.68 Like the retail sector, the commercial leisure sector is also going through transitional change even before the impact of the COVID-19 pandemic. As such demand continues to be limited.</p> <p>Office Development</p>	<p>Retail Impact Assessment and Town Centre Trends Study in response to considerable feedback on the draft Local Plan (Regulation 18) document concerning future retail demand and the changing nature of town centres. The findings have fed into the Local Plan.</p>	
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L&Q Group	2	Section 9	<p><i>Relates to Call for site</i></p> <p>4.2 Community Infrastructure L&Q is supportive of the flexible approach to delivering community infrastructure that is being proposed, which allows for both on-site provision and / or financial contributions where appropriate.</p>	Support noted.	No change.
Tetra Tech Planning (John Lyon's Charity obo)	2	Chapter 09	<p>Community Infrastructure Do you agree that the Local Plan has identified all of the issues around community infrastructure?</p> <p>No comments.</p>	Noted.	No change.
Albacore Meeting Room Trust (Lichfields obo)	- 2	Summary Document CI 01	<p><i>Relates to Call for site</i></p> <p>Community Use Needs and Benefits The Council's 'Summary Document' on Community Infrastructure¹ indicates that LBL residents have voiced concerns via the local plan review process regarding the existing poor condition and possible closure of some older community facilities in Lewisham Borough as well as concerns regarding whether there will be sufficient community facilities (such as surgeries and schools) to meet extra demand as the borough grows.</p> <p>In the document, the Council recognises that Lewisham's projected population growth will create extra demands for community facilities and services (including education, health and social care), which will need to be managed. The Council intend to prepare an Infrastructure Delivery Plan to identify and monitor needs in the Borough and ensure these are provided in the right places and also intend to ensure the Borough's needs for such uses are met via making the best use of existing facilities but also via and securing and providing high quality new facilities.</p> <p>As part of this review and preparation of evidence base documents, the Council will need to consider appropriate and sustainable sites to meet identified needs. The Brethren Meeting Hall site is suitable and available to meet identified community needs and offer associated substantial benefits to the Local Community.</p> <p>It is also relevant to consider the GLA's Stage 12 report on the Citygate Church Application for demolition of the vacant place of worship and creation of new church space and associated development on the site. The GLA officers note the</p>	The supplementary information is noted. Our response to the call for site for Brethren Meeting Hall is set out at the back end of this table.	No change

			<p>proposed building to be materially larger than the existing building on the site given it seeks to increase the building footprint and height that is permitted (see table at paragraph 24 of the Stage 1 report). The assessment is therefore made in context of the proposal being inappropriate development within the MOL that requires demonstration of ‘Very Special Circumstances’.</p> <p>However, sections of the GLA report are relevant to the ‘Exceptional Circumstances’ case for removing the Brethren Meeting Hall site from the MOL for community uses. The GLA supports the replacement and enhancement of social infrastructure on the site. Officers consider the key benefits of the Citygate proposal would be: provision of a secured connection for adjacent Sedgehill School children to the playing fields across the site to avoid travelling along the main road; the community use of the building; and, potential improvement to the MOL via enhancing soft landscaping on site.</p> <p>The GLA support the intention to provide for community uses on the site, in line with Policy S1 of the London Plan, and paragraph 5.1.11 which states that that voluntary and community groups often find it difficult to find premises suitable for their needs. In this context, the GLA ask for elements of the community use proposed, including availability for use by the adjacent school for large events and other community groups, to be secured by legal agreement in order to secure the benefit to the local community.</p> <p>In particular, the GLA support the part of Citygate’s VSC case which identifies there to be a lack of alternate options available for the development (i.e. of this size, type and location). The GLA recognises Citygate’s case that the community use cannot compete for other urban sites given the size of the site required for its purposes and the more competitive prices that urban land would generate for this community use. In their assessment, the GLA acknowledge that <i>“the existing site is vacant and available, and the proposed use would be policy compliant in land use terms for the site. The site is therefore of an appropriate scale and designation for the proposed use”</i>.</p> <p>The GLA’s comments also are positive with regard to the design and appearance of the proposed Citygate scheme, noting it to be an improvement from the existing Meeting Hall on the site, the Stage 1 report states: <i>“The design and appearance of the building has aimed to reduce its visual impact and a substantial portion of the floorspace would be below ground. Glass and transparent materials are also proposed, which would improve views into the site compared to the existing solid and derelict building... The visualisations and materials submitted demonstrate that the proposal will have an increased visual impact on the openness of the MOL. This harm has been minimised and mitigated by the applicant through reductions made to the size of the building, use of below ground structure, landscaping proposed and use of materials...”</i></p> <p>This demonstrates that development of the Brethren Meeting Hall site to meet identified community infrastructure needs could be achieved with limited visual impact to the MOL.</p>		
Albacore Meeting Room	2	CI 01	<i>Relates to Call for site</i>	Support noted. The comments regarding the site’s development	No change.
	2	CI 02	(c) Community Infrastructure: (CI1) Safeguarding and Securing Community		

Trust (Lichfields obo)			<p>Infrastructure and (CI2) New and Enhanced Community Infrastructure</p> <p>The Trust supports LBL’s intention to work collaboratively with Stakeholders to identify current and projected future requirements for community infrastructure including for healthcare, education, recreational and other community service needs in the Borough, and secure the necessary provision of this infrastructure (CI1 a). Identification of suitable and available sites should follow this assessment/evidence base, and subsequently appropriate sites, such as the Brethren site, should be allocated to meet identified needs.</p> <p>In particular, the Council’s encouragement of innovative approaches to community infrastructure provision, “<i>including new models of community infrastructure provision (such as multi-use and shared use facilities, or co-location of uses)</i>” (para 9.3) is supported. This aligns with national policy as it will provide opportunities to make better use of land and assets.</p>	contributing to this policy are noted.	
The Renewal Group (Carney Sweeney obo)	2	CI 01	<p><i>Relates to Part 3, LNA SA 08</i></p> <p>Policy CI1 Safeguarding and Securing Community Infrastructure</p> <p>Firstly, this policy needs to make clear that it does not seek to protect short term meanwhile uses.</p>	Policy CI1 does not need to refer to short term meanwhile uses as the Local Plan contains a specific policy that supports meanwhile uses, but only where it will be temporary in nature and will not preclude the future redevelopment of the site in question.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	CI 01	<p>12 Chapter 9-12 Community Infrastructure, Green Infrastructure, Sustainable Design & Infrastructure and Transport</p> <p>Community Infrastructure</p> <p>12.1 Chapter 9 contains key policies on Community Infrastructure focusing on ensuring that neighbourhoods are well supported with facilities and services; making the best use and securing facilities; and providing high quality facilities.</p> <p>12.2 Community facilities and social infrastructure are critical for creating successful places and enabling new development. There is some uncertainty about future demographics in the borough and therefore the demand for community facilities, and in particular future schools’ places, over the longer term is unclear. Landsec therefore supports the Councils’ plan and monitor approach as set out in the Infrastructure Development Plan.</p> <p>12.3 For large scale developments, the Council should ensure that policies can be sufficiently flexible to enable development, and recognise the practicalities requires of doing so, including the need for bespoke planning and agreement.</p> <p>12.4 Policy CI1 ‘Safeguarding and securing community infrastructure’ advises at part D that new development will be supported where it safeguards and enhances community infrastructure. In respect to the loss of an existing community facility, or land and buildings formerly in community use, it is unclear the reasoning behind the 12-month continuous marketing time period which has</p>	Comment Noted	No change.

			<p>not been justified in the Reg 18 Plan or its relevant evidence base (Draft Infrastructure Delivery Plan (November 2020)).</p> <p>12.5 Part E advises that payment-in-lieu would only be acceptable where the existing or alternative community use is not viable. This should be decided on a case by case basis including consideration of the need (and recent use) for the facility and whether it is the best use of land.</p>		
QUOD (Landsec obo - Lewisham Shopping Centre)	2	CI 02	12.6 Policy CI2 ‘New and enhanced community infrastructure’ stipulates requirement for new infrastructure. Community infrastructure is sometimes planned to meet specific needs and / or with specific occupiers in mind, but at other times is planned with flexibility to meet future needs and therefore the occupiers are not yet known.	Comment noted.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	CI 03	12.7 Landsec welcomes Lewisham’s intention to meet the London Plan Policy S4 ‘Play and Informal Recreation’ requirement at Policy CI3 ‘Play and informal recreation’ to incorporate well designed and high-quality formal play provision of at least 10 square metres per child. This is supported.	Support is noted.	No change.
L&Q Group	2	CI 03	<p><i>Relates to Call for site</i></p> <p>Policy CI3 (Play and informal recreation) provides welcome guidance regarding the Council’s expectations for the provision of children’s play space, in accordance with the principles contained within the London Plan (2021). Part C of Policy CI3 states that all new play space and provision for informal recreation should be designed and managed with “unrestricted public access”. This is not feasible where play space is provided within communal amenity space designed specifically for residents of the scheme, such as within a podium courtyard. If the play space within these spaces were required to be publicly accessible, this would raise concern from both a security, building management and maintenance perspective and is likely to significantly increase maintenance, and in turn service, charges. We suggest that “unrestricted public access” is removed from Policy CI3 C a) in respect to communal amenity spaces. For the avoidance of doubt, we recognise new play space in the public realm should be available for public access.</p>	Noted.	Local Plan amended as suggested, to ensure that public access encouraged and not unreasonably restricted, in line with Secure by Design Principles.
Barratt London and the Church Commissioners (Avison Young obo)	2	CI 03	<p><i>Relates to Part 3, LCA SA 20</i></p> <p>Draft Policy CI3 Play and informal recreation</p> <p>Barratt London and the Church Commissioners support the London Plan benchmark of 10 sqm per child as the standard sought by Draft Policy CI3.</p> <p>Part B of this Draft Policy refers to play space provision being made accessible to all children in the development irrespective of housing tenure. Part C then refers to play space having unrestricted public access. The current wording of these parts of the Draft Policy could give rise to security and management issues at occupation stage. Draft Policy QD2 is clear that development proposals must have regard to ‘Secured by Design’ principles, and we highlight that Part B and Part C of Draft Policy CI3 in their current form potentially conflict with this. As referred to previously, large developments which contain many blocks or uses are often owned and/or managed by different parties who may have individual security and management requirements. Of note, affordable housing provision is most often managed separately to the wider housing offer by an RP (which</p>	Noted.	Local Plan amended as suggested, to ensure that public access encouraged and not unreasonably restricted, in line with Secure by Design principles.

			<p>would likely wish to ensure its residents are not subject to service charges of areas which they rarely use).</p> <p>We, therefore, request that Part B of this policy be amended to seek play space provision being made accessible to all children ‘where possible subject to other considerations such as design, security and future management arrangements’. The Policy could also be amended to remove reference to all children accessing all spaces and instead require demonstration at application stage of adequate provision of play space for each block or phase of a development. This approach will help to ensure that equitable play space provision is provided to meet the needs of future occupiers, and these spaces can be appropriately managed at occupation stage.</p> <p>In addition, there may be instances where play is provided within communal gardens accessible to future residents and not the wider public, such as within courtyard blocks. We request that Part C of Policy CI3 therefore be amended to seek play space having unrestricted public access where possible, subject to other considerations such as design, security and future management. This approach will help to ensure appropriate flexibility for future development schemes to come forward with housing typologies that optimises development and responds to the character and context of the site and wider area.</p>		
Austringer Capital Ltd (Tetlow King Planning obo)	2	CI 05	<p><i>Relates to Call for site</i></p> <p>Policy CI5: Burial Space</p> <p>4.15 Policy CI5 explains the Council’s approach to securing sufficient burial space to meet the needs of its communities, maintaining access to existing spaces for new burials and supporting the delivery of new cemetery sites. Part B of policy CI5 provides for new sites to come forward where these meet the needs of various groups within the Borough. In general terms, policy CI5 provides a suitable framework for burial spaces to come forward.</p> <p>4.16 Paragraph 9.22 notes the existing evidence base for cemetery provision in Lewisham which includes the 2011 GLA Audit. However, paragraph 9.23 notes that the Council is preparing an updated assessment of local burial space capacity. The Council’s decision to review burial space capacity is welcomed since the existing evidence base is dated and, based upon the FoI response we have received, indications are that there is a pressing need for burial space.</p> <p>4.17 Whilst the general tenor of policy CI5 is welcome, we are concerned that the Local Plan currently only allows for the retention of existing burial space and for any new burial space to be identified on an ‘ad hoc’ basis through the planning application process. We recommend that in order to be positively prepared, the Local Plan seeks opportunities to allocate sites for burial provision. This will ensure the Council is able to match the supply of spaces with demand, ensuring a supply of burial space can be maintained throughout the Plan period.</p> <p>4.18 As discussed at section 3 of these representations, the former Willow Tree Riding Establishment could provide a cemetery to deliver a potential 6,700 burial plots subject to detailed design.</p>	<p>The Infrastructure Delivery Plan acknowledges that following short-term upgrades to existing cemeteries there will be sufficient burial capacity in the medium to longer term. This position will be reviewed through future updates to the IDP. At this point, it is not considered that specific sites need to be allocated in the Local Plan for burial provision.</p> <p>Our response to the call for site for the former Willow Tree Riding Establishment is set out at the back end of this table.</p>	No change.

L&Q Group	2	Section 10	<i>Relates to Call for site</i> 4.5 Green Infrastructure The draft Local Plan reiterates the requirements set out in the London Plan for maximising green infrastructure (including biodiversity net gain and urban greening factor targets) which L&Q supports in principle.	Support noted.	No change.
Tetra Tech Planning (John Lyon’s Charity obo)	2	Chapter 10	Green Infrastructure Do you agree that the Local Plan has identified all of the issues around green infrastructure? The Charity generally supports the approach taken to managing and securing green infrastructure. Green infrastructure required for the proposed site allocation at Bell Green Retail Park should be informed by a Masterplan for the Site. The need for a Masterplan is discussed in our answers on Part Three below.	Support noted.	No change.
Albacore Meeting Room Trust (Lichfields obo)	2	GR 01	<i>Relates to Call for site</i> (d) Green Infrastructure The Trust notes the importance of open space and the Council’s network of green and open spaces, which make an important contribution to the local character of the Borough as well as encourage healthy lifestyles and social benefits. It is agreed that development proposals should maximise opportunities to provide green infrastructure on site (GR1). However, it is important that land should only be designated as MOL if it meets the criteria for designation. To do otherwise risks preventing redevelopment and enhancement of otherwise sustainable, previously developed sites, such as the site at Beckenham Hill. In fact, our representations at part 1 (including Appendix 1) demonstrate how such release of the site from the MOL and subsequent allocation for community use development could work to the benefit of the wider MOL swathe, in particular to enhance the existing site’s (absent) contribution to the designated South East London Green Chain.	Support noted. The comments regarding the designation of MOL land and contribution to the South East London Green Chain are noted.	No change.
Austringer Capital Ltd (Tetlow King Planning obo)	2	GR 02	<i>Relates to Call for site</i> Policy-Specific Comments Section 4 4.1 This section provides our comments on the policy content of the emerging Local Plan. Policy GR2: Open Space and Lewisham’s Green Grid 4.2 This policy seeks to achieve several objectives in relation to open space and green infrastructure, which include protection of existing open spaces, provisions for reconfiguration and ancillary uses, and the achievement of improved connectivity for active travel.	Noted.	No change.

			<p>4.3 The policy as drafted takes a rigid approach in seeking no net loss of open space. Part C of the policy sets a presumption against development that results in a loss of open space, noting that such proposals will be ‘strongly resisted’. In a similar vein, part D seeks to avoid a net loss of open space in re-configuring open space.</p> <p>4.4 Whilst the protection of open space is a laudable principle, the ‘no net loss’ requirement is unduly restrictive and could prevent meaningful improvements to poor quality open spaces. For example, the open space designations across the Borough include private land to which there is no public access (indeed, this is the case at the former Willow Tree Riding Establishment site) and currently offer little benefit to residents. There may also be opportunities to achieve ecological enhancements, or linear walking routes, however these may need to come forward in the context of some development to allow them to occur – and indeed policies LEA4 and LEA5 recognise this in the context of the vision for the East area. As drafted, the emerging Local Plan makes it difficult to secure qualitative improvements to poor-quality open space where this would require some quantitative loss of open space. Yet, a loss of open space in quantitative terms might be able to support a meaningful improvement to the remaining open space in social and environmental terms. Conversely, without development some existing poor-quality or publicly inaccessible open space may remain so, offering little benefit as open space.</p> <p>4.5 National planning policy does not require a ‘no net loss’ approach. Policy G4 ‘Open Space’ of the London Plan seeks that ‘<i>Development proposals should not result in the loss of protected open space</i>’ but also encourages the creation of ‘<i>publicly accessible open space, particularly in areas of deficiency</i>’. Table 8.1 of the London Plan sets out that open spaces may include ‘Linear Open Space’ alongside infrastructure routes but in contrast to other forms of open space may include elements of private land.</p> <p>4.6 Clearly, there are tensions between maintaining the existing quantity of open space, and other objectives of improving quality and public access. We therefore recommend that the draft policy is revised to allow a more nuanced balance of the loss of poor quality open spaces with the potential for qualitative enhancements.</p>		
Austringer Capital Ltd (Tetlow King Planning obo)	2 2	GR 02 Figure 10.2	<p><i>Relates to Call for site</i> Figure 10.2: Open Spaces</p> <p>4.7 Figure 10.2 accompanies policy GR2 and illustrates the open spaces in Lewisham and their typology. Whilst this is an overarching plan for the entire borough, it nonetheless offers a reasonable degree of detail on specific sites. For example, the Willow Tree Riding Establishment site is identified as part of a Green Corridor but the existing areas of hardstanding are excluded.</p> <p>4.8 There is the opportunity, through the production of more detailed Policies Maps, to review the open space designations for specific sites. It may be possible to exclude certain areas from sites which offer poor quality open space (e.g. areas of hardstanding or built form, or other parts of the site which are of limited ecological value) which may open more opportunities for development and changes of use to occur and support the enhancement of areas of greater open space or ecological value elsewhere at the site.</p>	Noted. Following the Regulation 18 consultation the Council has undertaken additional evidence base work on Open Spaces, which together with public consultation responses, has informed revisions to the Open Spaces policy. This will set a clear hierarchy of open spaces and policies to support their protection.	Local Plan amended to clarify the different typologies of open space within an open space hierarchy and the level of protection afforded to each. This include clarification between green open spaces and other open spaces (e.g. hardstanding but part of public realm).

Albacore Meeting Room Trust (Lichfields obo)	2	GR 02	<p>Lichfields corresponded with London Borough of Lewisham (LBL) Council Officers in Autumn 2020 obo the Trust, principally in respect of the limited contribution the existing site makes to the MOL and, as a consequence, the scope for full or partial release of the land. The Trust considers the site should be removed from the MOL and requests that it is allocated for redevelopment to provide a new flexible community use building.</p> <p>Accordingly, representations are first made in respect of the LBL Metropolitan Open Land Review, 5 March 2020 and justification is provided for allocating the site (Part 1), as well as to the following policy areas (Part2) of the draft Local Plan:</p> <p>a. Lewisham’s South Area (LSA2) b. Spatial Strategy Options (OL1) c. Community Infrastructure (CI1) d. Green Infrastructure (GR1/GR2)</p> <p>(Part 1) Metropolitan Open Land and Proposed Allocation Exceptional Circumstances Policy Test</p> <p>Overarching MOL Policy is established through the London Plan (2021), Policy G3, which requires boroughs to designate the extent of MOL in their local plans with any changes to the existing boundaries to be undertaken through the local plan process. MOL is afforded equal status as Green Belt and the principles of national Green Belt policy apply to MOL.</p> <p>As such, the removal from the MOL and allocation of the Brethren site would need to be justified by ‘exceptional circumstances’ as per paras 137 – 139 of the NPPF. London Plan Policy G3 confirms that <i>‘MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL as set out in Part B’</i>.</p> <p>The MOL criteria at ‘Part B’ are: A <i>“it contributes to the physical structure of London by being clearly distinguishable from the built-up area;</i> B <i>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;</i> C <i>it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value;</i> D <i>it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria”.</i></p> <p>LBL MOL Review Evidence Base: Lichfields Review Lichfields has undertaken a review and assessment of the LBL Review of MOL in Lewisham, prepared by Arup in March 2020. The review is attached to these representations at Appendix 1. Our review assesses the contribution the existing Meeting Hall site currently and potentially could make to the MOL and, as a consequence, the scope for full or partial release of the land. The site lies within a wider swathe of designated Metropolitan Open Land, defined by Arup in its March 2020 review as ‘Area 15’. A wider area of MOL land exists to the south comprising Beckenham Place. Arup’s MOL Review concludes that Area 15 should be retained in the MOL, assessing it overall to fulfil its role for MOL purposes – meeting Criterion A but scoring weakly against other MOL</p>	Lichfield’s MOL assessment of this site is noted. However the Council has prepared its own MOL review using independent consultants and will use this as the basis for Local Plan decisions.	No change
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			<p>criterion, principally due to the area’s limited public access, recreational value and performance in the Green Chain.</p> <p>The Lichfields MOL assessment builds on the LBL Arup Assessment and looks at both the site and wider MOL Area 15 in which the site is situated, having considered Arup’s assessment approach and method. It finds that, whilst it is appropriate for Arup to have considered the site as part of a larger swathe of MOL, it is clear that there is a very weak case for retention in terms of the existing site’s performance (on its own) against the MOL criteria – it does not meet the MOL designation criteria, save for criterion A (see above) in a ‘very weak’, partial sense.</p> <p>The site is developed and urban in nature, is private and entirely fenced off and does not include any features of national or metropolitan value. It is therefore requested that Area 15 should instead be considered for release from the MOL and partial enhancement of the retained open space as part of a new development allocation in the draft new local plan.</p>		
SGN (Quod obo)	2	GR 02	<p><i>Relates to Part 3, LSA SA 01</i></p> <p>Chapter 10 - Green Infrastructure</p> <p>5.19 SGN supports Policy GR2 ambition to maximise opportunities for new publicly accessible open space to all new major developments in order to mitigate the identified open space deficiencies across Lewisham and enhance the existing network of open spaces across the borough.</p>	Support noted.	No change.
Phoenix Community Housing (BPTW obo)	2	GR 02	<p>Green Infrastructure</p> <p>The sanctity of the All London Green Grid Framework and its strategic role in the GLA’s vision of a National Park City is agreed, and its proposed policy protection is strongly supported, as is the ambition to deliver net gains in biodiversity in all development. We are particularly pleased to see policy protection afforded to the Bellingham sports ground and the Temple land opposite Beckenham Place Park. However, for the more local open space and biodiversity assets such as allotments, SINCs, pocket parks and non-designated green spaces etc. we would request that greater flexibility is built into part D of policy GR2, which allows the reconfiguration of open space. Rather than no net loss of space, we propose that ‘no net loss of functionality’ is a more appropriate test. This would be more consistent with national policy, given the NPPF’s recognition that open space can be multifunctional (e.g. play space, biodiversity, active travel, sustainable drainage, UGF), meaning that the benefits of open space can be expanded within a smaller area. Further, we suggest that Housing Associations with large management portfolios of existing estates as well as infill and brownfield opportunities would benefit greatly from added flexibility to allow reconfiguration of localised green infrastructure across the portfolio following careful consideration and in consultation with local residents. This would allow for a re-balancing of provision between areas of abundant greenery and areas of scarcity, raising the standard of provision in general across the portfolio, and means affordable housing can forward in the most appropriate locations available.</p>	Noted. Following the Regulation 18 consultation the Council has undertaken additional evidence base work on Open Spaces, which together with public consultation responses, has informed revisions to the Open Spaces policy. This will set a clear hierarchy of open spaces and policies to support their protection, including consideration of amenity open spaces such as those on housing estates.	Local Plan amended to clarify the different typologies of open space within an open space hierarchy and the level of protection afforded to each. This include clarification between green open spaces and other open spaces (e.g. hardstanding but part of public realm).
QUOD (Landsec obo - Lewisham Shopping Centre)	2	GR 02	<p>Green Infrastructure</p> <p>12.8 Chapter 10 contains key policies on green infrastructure and biodiversity, ensuring that spaces and natural sites are protected and enhanced; improving public access to spaces and promoting urban green spaces.</p> <p>12.9 Policy GR2 ‘Open space and Lewisham’s green grid’ seeks to ensure that all development proposals maximise opportunities to introduce new publicly accessible open space and that any loss will be strongly resisted. To avoid ambiguity between the Reg 18 plan and the London Plan, all references to open</p>	Noted.	Policies on designated open spaces have been amended.

			space in parts C-G of the draft Policy GR2 should include the word <i>“protected”</i> in its terminology to reflect Part B of London Plan Policy G4 ‘Open Space’. A definition of protected open space should also be included in the glossary.		
QUOD (Landsec obo - Lewisham Shopping Centre)	2	GR 03	12.10Landsec is supportive of Lewisham’s intended approach to net gains in biodiversity as detailed at draft Policy GR3 ‘Biodiversity and access to nature’, as well as its affirmation of the urban green factor (UGF) in accordance with Policy G5 of the London Plan.	Support is noted.	No change.
L&Q Group	2	GR 04	<i>Relates to Call for site</i> Policy GR4 (D) requires development proposals to maximise the use of living roofs and walls. Whilst L&Q supports this policy direction in principle, as a housing association we are concerned about the cost of long-term maintenance and management of living roofs and walls and the impact this could have on service charges for future residents. As such, we request that affordability of new homes be taken into consideration when demonstrating whether it is feasible to include living roofs and walls in forthcoming development proposals.	Noted. The draft Local Plan does not set specific requirements in this regard, and encourages developments to maximise opportunities. Development feasibility and viability will be considered on a case-by-case basis.	No change.
SEGRO (CBRE Limited obo)	2	GR 04	<i>Relates to Part 3, LNA SA 04</i> SEGRO’s key recommendations for the draft plan comprise: Requirements for an urban greening factor of 0.3 and a minimum plot ration of 65% for warehousing development should be removed to ensure general conformity with the London Plan 2021.	Noted.	Local Plan amended to reflect that target UGF for predominantly commercial development excludes B2 and B8 uses. Local Plan amended to provide new definition of industrial capacity and removal of 65% plot ratio.
SEGRO (CBRE Limited obo)	2	GR 04	<i>Relates to Part 3, LNA SA 04</i> 2. Urban Greening SEGRO prides itself on its commitment to sustainable design, which includes finding creative and high-quality solutions to biodiversity enhancement its new developments, and so the principle of urban greening policies is supported. At present, Part C of draft plan policy GR4 (Urban Greening) sets a target urban greening factor (hereafter “UGF”) score of 0.3 for commercial development. As currently drafted, this policy is not consistent with the London Plan which requires 0.3 UGF target for commercial except B2 and B8 developments. The London Plan applied this exclusion for warehousing development in response to SEGRO’s examination evidence which demonstrated that the policy would not be sound, due to the unique design and viability challenges of achieving a UGF score of 0.3 in warehousing development. One such challenge is the significant increase in embodied carbon within the building’s structure that would be required to take the load of a green roof. Again, SEGRO’s evidence to the London Plan on this point is appended for reference.	Support is noted. Agree that the Local Plan should be consistent with the London Plan, which now states a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses).	Local Plan amended to reflect that target UGF for predominantly commercial development excludes B2 and B8 uses.

			<p><i>LB Lewisham officer note: Appendix 2: Urban Greening Evidence is included in the original representation.</i></p> <p>To ensure conformity with the London Plan, draft policy GR4 should be updated so that the requirement for a UGF score for commercial excludes B2 and B8 uses.</p>		
L&Q Group	2	GR 05	<p><i>Relates to Call for site</i></p> <p>Policy GR5 (Food growing) encourages major development proposals to include provision of space for community gardening and food growing. We would welcome further guidance regarding the priority to be given to community gardening and food growing provision over other spatial requirements, such as children’s play space, to ensure that we are able to make best use of space as part of future development projects.</p>	Noted. Disagree. The London Plan sets standards for housing, including children’s play space and indoor/outdoor amenity space. The suggested change would represent a departure from the London Plan.	No change.
Tetra Tech Planning (John Lyon’s Charity obo)	2	Chapter 11	<p>Sustainable Design and Infrastructure</p> <p>Do you agree that the Local Plan has identified all of the issues around sustainable design infrastructure?</p> <p>No comments.</p>	Noted.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	SD 01	<p>Sustainable Design & Infrastructure</p> <p>12.11Chapter 11 addresses sustainable design and infrastructure. Lewisham were one of the first local authorities to declare a climate emergency. This plan will play an important role in helping the borough to respond to the climate emergency. It provides the strategic framework for climate change mitigation and adaption in respect of the future use and management of land within the borough.</p> <p>12.12Draft policy SD1 ‘Responding to the climate emergency’ sets out the council’s broad framework to become a net zero borough by 2050. This policy establishes principles to help deliver environmental sustainability, reflecting the importance of green and open spaces, biodiversity, urban greening; flood risk and resilience; air quality and net waste self-sufficiency. A plan, manage and monitor process will be used to support the successful transition to a net zero carbon Borough. The borough will regularly assess performance against their strategic objectives through the Authority Monitoring Report process, which will enable the plan to be kept up to date to reflect the latest requirements and standards at the regional and national levels. Landsec is supportive of this policy, having published their own net zero pathway in December 2020.</p> <p>12.13Draft policy SD1 is proposed alongside more specific policies for sustainable design (SD2), minimising greenhouse gases (SD3) and design to support a circular economy (SD12), which taken as a whole, will support the transition to net zero through spatial planning and design standards.</p>	Comments noted.	No change.
Fifth State and (Avison Young obo)	2	SD 02	<p><i>Relates to Part 3, LNA SA 16</i></p> <p><i>Draft Policy SD2 - Sustainable Design</i></p> <p>Part D of the draft Policy requires new non-residential development of 500 sqm or more to achieve a BREEAM ‘Excellent’ rating. At present this wording does not allow for any site specific technical constraints which may mean that an ‘Excellent’ rating cannot be achieved. We therefore request that the policy wording is amended to seek to achieve (rather than require) developments to achieve an ‘Excellent’ rating, with appropriate justification to be provided at</p>	Noted. Disagree that the policy should seek to achieve, rather than require, although agree that a justification should be provided where this cannot be met.	Local Plan amended to clarify that development proposals must meet the requirement unless it can be demonstrated that this is not feasible.

			planning application to explain the rating that is possible for the development to meet.		
L&Q Group	2	SD 02	<p><i>Relates to Call for site</i></p> <p>Policy SD2 (C) requires major residential domestic refurbishment proposals to achieve a certified ‘Excellent’ rating under the BREEAM Domestic Refurbishment 2014 scheme, or future equivalent. Whilst L&Q supports reducing the environmental impact of refurbished buildings, as a housing association we are concerned that an ‘Excellent’ rating will not be achievable in every case and may impact the ability to deliver affordable housing due to prohibitive costs. To allow flexibility, we suggest this policy be reworded to encourage the achievement of an ‘Excellent’ rating as an aspiration rather than an expectation.</p>	Noted. The Local Plan Viability Assessment demonstrates that the requirement can be viably delivered. However it is recognised there may be technical feasibility issues.	Local Plan amended to clarify that development proposals must meet the requirement unless it can be demonstrated that this is not feasible.
Barratt London and the Church Commissioners (Avison Young obo)	2	SD 02	<p><i>Relates to Part 3, LCA SA 20</i></p> <p>Chapter 11 Sustainable Design & Infrastructure Draft Policy SD2 Sustainable design</p> <p>Part B of the Draft Policy requires residential development to achieve the BRE Home Quality Mark. Given the BRE Home Quality Mark is a relatively new standard within the industry and may be subject to future change, we request the policy wording is amended to ‘seek’ /‘target’ rather than ‘require’ development to achieve the BRE Home Quality Mark, with consideration given to site specific circumstances.</p> <p>Part D of the Draft Policy requires new non-residential development of 500 sqm or more, to achieve a BREEAM ‘Excellent’ rating. At present this wording does not acknowledge there may be site specific technical factors that mean an ‘Excellent’ rating cannot be achieved. We therefore request the policy wording is amended to ‘seek’ or ‘target’ rather than ‘require’ development to achieve a BREEAM ‘Excellent’ rating, with appropriate justification to be provided at the application stage to explain the rating level the development would meet.</p>	Noted. The Local Plan Viability Assessment demonstrates that the requirement can be viably delivered.	Local Plan amended to state that proposals should seek to achieve the Home Quality Mark.
Cockpit Arts (The Planning Lab obo)	2	SD 02	<p><i>Relates to Part 3, LNA SA 14</i></p> <ul style="list-style-type: none"> • CA is supportive of policies which require a sustainable approach to development, particularly a reduction in carbon emissions to reach net zero. Our makers are also committed to these principles, and to the circular economy generally, and can play a key role including in terms of local production, innovative use of waste materials, supporting repair and development of skills in the local economy, and as role models/exemplars. 	Support noted.	No change.
Artworks Creekside (Avison Young obo)	2	SD 02	<p><i>Relates to Part 3, LNA SA 16</i></p> <p><i>Draft Policy SD2 - Sustainable Design</i></p> <p>Part D of the draft Policy requires new non-residential development of 500 sqm or more to achieve a BREEAM ‘Excellent’ rating. At present this wording does not allow for any site specific technical constraints which may mean that an ‘Excellent’ rating cannot be achieved. We therefore request that the policy wording is amended to seek to achieve (rather than require) developments to achieve an ‘Excellent’ rating, with appropriate justification to be provided at planning application to explain the rating that is possible for the development to meet.</p>	Noted. The Local Plan Viability Assessment demonstrates that the requirement can be viably delivered. However it is recognised there may be technical feasibility issues.	Local Plan amended to clarify that development proposals must meet the requirement unless it can be demonstrated that this is not feasible.
Transport for London	2	SD 02	SD2 Sustainable design	Noted. The Local Plan Viability Assessment	Local Plan amended to state that proposals

Commercial Development			It is noted that criterion B requires new residential development to achieve the BRE Home Quality Mark. The ministerial statement in March 2015 indicated that local planning authorities would not be able to require any standards above the regulatory minimum for new dwellings apart from those set out in the new national options and it is considered that the requirement for the BRE Home Quality Mark would not accord with this.	demonstrates that the requirement can be viably delivered.	should seek to achieve the Home Quality Mark.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	SD 02	12.14Draft policy SD2 lists various design requirements for new and existing development. It is noted at part B that proposals for new self-contained major and minor residential development will be required to achieve the BRE Home Quality Mark. Supporting text identifies that ‘proposals are strongly recommended to achieve a minimum 3-star rating’ but is not prescribed in policy. This flexibility is welcomed.	Support noted.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	SD 03	12.15Draft policy SD3 relates to minimising greenhouse gases and reflects the London Plan requirements for carbon reduction. Policy SD3 C states that major development proposals will be required to achieve a minimum on-site reduction of at least 35 per cent (beyond the baseline of Part L) of the current Building Regulations. Part D of the policy confirms that under exceptional circumstances where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, development proposals will be required to make contributions to address the identified shortfall through a cash-in-lieu contribution to Lewisham’s carbon offset fund; or appropriate off-site measures where these can be demonstrated to be deliverable. This requirement indicates that in general net zero should be achieved on sites, unless there are exceptional circumstances, albeit it appears to contradict part C, which states that a minimum 35% will be obtained. It is recognised that the intent of the policy should be to maximise carbon savings on site, however clarification is recommended with regards to Part C and D of this policy.	Noted.	Policy SD3 revised to provide more clarity.
L&Q Group	2	SD 04	<i>Relates to Call for site</i> Policy SD4 (G) requires major housing proposals to submit an estimated heat unit supply price, annual standing charges, and projected annual maintenance costs for their proposed Energy Strategy. We note that this is a high level of detail (over and above that required by the London Plan) to be provided at planning submission stage and figures will be subject to change upon the completion of fully co-ordinated technical design at RIBA Stage 3, which typically occurs post-planning. We therefore request that the level of detail able to be provided at planning submission stage not be a barrier to receiving planning approval, and consider the energy performance of new buildings would be more appropriately controlled through the application of appropriately worded planning conditions and / or the building control regime.	Noted. Agree that there should be flexibility regarding the timing for submitting this information and that they can be controlled through planning obligations or Building Control.	Policy amended using proposed wording
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	2	SD 09	<i>Relates to Part 3, LNA SA 14</i> Water management We note that Policy SD9 (Water management) relates to watercourses and flood defences. The supporting text in paragraph 11.53 states prescriptive relief (set back distances) between new development and river frontages – unless otherwise agreed by the Council and Environment Agency, with buffer zones left free of permanent structures and integrated into a new development to enhance their amenity value. It states as follows: <i>In order to ensure there is no adverse impact of the natural functioning of a watercourse, or the integrity of a flood defence, all new development must maintain an undeveloped buffer zone with an adequate set back distance from the watercourse. A relief of 8 metres from a main river and 5 metres from an</i>	Noted. The Local Plan sets these benchmark requirements on the advice of the Environment Agency, and already provides flexibility to other distances provided these are agreed by the Council and EA.	No change.

			<p><i>ordinary watercourse should be secured, unless otherwise agreed by the Council and the Environment Agency. Buffer zones should be left free of permanent structures, ensure adequate access for the maintenance of flood defences and be sensitively integrated into development in order to enhance their amenity value...” (Our Emphasis.)</i></p> <p>It is considered that the drafting of the policy is currently overly prescriptive and would unnecessarily constrain redevelopment. This would not be effective and could restrict the delivery of future redevelopment and any associated full benefits, including new homes, new affordable homes and new jobs.</p> <p>We consider that each site must be considered on its own merits and any relief (set back distance) between new development and the frontage to be agreed with the Council and the Environment Agency on a case by case basis, having regards to all relevant technical matters, site specific constraints and development that would be brought forward, including the overall planning and public benefits.</p> <p>Whilst it is acknowledged that the current drafting includes the following text: <i>“unless otherwise agreed by the Council and the Environment Agency”</i> – and could potentially allow an alternative set back distance to be agreed with the Council and Environment Agency, we consider the policy should be updated as follows (the deletions are shown as strikethrough, the additions are shown underlined):</p> <p><i>A relief of 8 metres from a main river and 5 metres from an ordinary watercourse should be secured, unless otherwise agreed by the Council and the Environment Agency.</i></p> <p><i>A relief from a main river or ordinary watercourse should be secured and agreed by the Council and the Environment Agency.</i></p> <p>This would ensure that the policy is effective and deliverable.</p>		
L&Q Group	2	SD 12	<p><i>Relates to Call for site</i></p> <p>Policy SD12 (E) requires that all new proposals for multi-storey flatted residential development make provision for “sensitively designed storage and collection systems at each floor”. It is industry practice that space is provided within the flat and then either at ground / basements; it is not considered appropriate to provide additional storage within common areas at each floor level. This will create the need to larger cores and circulation space, likely increasing the bulk and massing of buildings. Moreover, it will create additional management and management requirements and associated increased service charges.</p> <p>Part E also requires that design options for basement servicing be investigated before considering the use of forecourts or ground floor internal storage. It is considered inappropriate to promote basements above the use of forecourt or ground floor internal storage. Basements are costly and often, in highly contaminated areas, inappropriate for excavation for public health reasons. We therefore request that greater flexibility be offered when consideration the most appropriate servicing strategy, taking into account site-specific constraints. Basements should not be the preferred starting point.</p>	Noted.	Local Plan amended by providing more flexibility to waste management design for new developments.

Barratt London and the Church Commissioners (Avison Young obo)	2	SD 12	<p><i>Relates to Part 3, LCA SA 20</i></p> <p>Draft Policy SD12 Design to support the circular economy</p> <p>Barratt London and the Church Commissioners support the application of the London Plan circular economy approach in Part A of the Draft Policy.</p> <p>Part E of the Draft Policy states new multi-storey flatted residential development, including mixed-use development, must make provision for sensitively designed storage and collection systems on each floor. This does not reflect how waste is collected from the majority of new build schemes delivered in the borough or across London. The approach to waste collection should be determined with regard to technical and design considerations and in discussion with the Council's Waste and Highways Officers, to ensure development makes the most efficient use of land and satisfies other requirements such as Secured by Design and Building Regulations, where necessary.</p> <p>We therefore request Part E is amended to remove reference to a requirement for 'storage and collection systems at each floor' to be delivered.</p>	Noted.	Local Plan amended by providing more flexibility to waste management design for new developments.
QUOD (Landsec obo - Lewisham Shopping Centre)	2	SD 12	12.16Draft Policy SD12 'Design to support the circular economy' requires that major development proposals aim to be net zero-waste and are required to submit a Circular Economy Statement, as part of the Sustainable Design Statement. Landsec are supportive of this approach.	Support is noted.	No change.
L&Q Group	2	Section 11	<p><i>Relates to Call for site</i></p> <p>4.6 Sustainable Design & Infrastructure</p> <p>L&Q recognise the need for sustainable design principles in new developments. The London Plan now requires the submission of Circular Economy Statements and Whole Life-cycle Carbon Assessments, as well as Urban Greening Factor and Biodiversity Net Gain information. For consistency, we consider that Lewisham's local requirements should be brought into line with those of the adopted London Plan, and that the requirements of a Sustainable Design Statement will already be covered by these planning deliverables.</p>	Noted. The Local Requirements List is outside the scope of the Local Plan. This will be amended in line with the extant Development Plan.	No change.
L&Q Group	2	Section 12	<p><i>Relates to Call for site</i></p> <p>4.7 Transport & Economy</p> <p>L&Q welcomes the LBL's approach of giving consideration to future planned Public Transport Accessibility Levels when assessing new development proposals, given the key role the Bakerloo Line Extension would play in the Borough should this project come forward.</p>	Support noted.	No change.
Transport for London Commercial Development	- 2	General TR 01	<p>RE: LEWISHAM LOCAL PLAN MAIN ISSUES AND PREFERRED APPROACHES REGULATION 18</p> <p>Thank you for providing the opportunity to comment on the Lewisham Local Plan Main Issues and Preferred Approaches Regulation 18. Please note that our representations below are the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a landowner in the borough only and are separate from any representations that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.</p>	Noted. Comments to additional representations set out elsewhere in the Consultation Statement.	No change.

			<p>TfL CD have previously submitted the following representations: –Lewisham Call for Sites (October 2018)</p> <p>Please note that our attached representations are the views of the Transport for London Commercial Development planning team in its capacity as a landowner in the borough only and are separate from any representations that may be made by TfL in its statutory planning role and/or as the strategic transport authority for London.</p>		
Transport for London Commercial Development	- 2	General TR 01	<p>Concluding Remarks</p> <p>We hope that these representations are helpful but if you need any further information or would like to discuss any of the points raised in our representations, please do not hesitate to contact me. We look forward to being kept up to date with your programme going forwards.</p>	Noted.	No change.
Transport for London Commercial Development	2	TR 01	<p>TR1 Sustainable transport and movement</p> <p>Criterion a. of this policy is strongly supported.</p>	Support noted.	No change.
Notting Hill Genesis (Savills obo)	2	TR 01	<p><i>Relates to Call for site</i></p> <p><i>Other Matters</i></p> <p>NHG supports the Council’s approach to sustainable transport through encouraging a shift away from car use to more sustainable transport modes as set out within the draft Local Plan Policy TR1. This policy further states that development proposals should make the most effective use of land and optimise the capacity of sites by taking into account connectivity and accessibility to existing and planned future public transport. NHG supports the Council’s approach to optimising site capacity, which is in accordance with the London Plan.</p>	Support noted.	No change.
GHL (Leegate) Limited (Frank Knight obo)	2	TR 01	<p><i>Relates to Part 3, LEA SA 03</i></p> <p>4. Transport and Connectivity</p> <p>Policy TR1 (Sustainable transport and movement) remarks that the integration of land use and transport, along with an effective public transport network, are essential to delivering inclusive, healthy, liveable, walkable and sustainable neighbourhoods in Lewisham. Policy TR1 adds that priority should be given to reducing car use and improving opportunities for movement by walking, cycling and the use of public transport.</p> <p>GHL strongly supports Policy TR1 and recommends that the supporting policy text emphasises the importance of sustainable alternatives, in accordance with Chapter 9 (Promoting sustainable transport) of the NPPF and Policy T1 (Strategic approach to transport) of the London Plan.</p>	Support noted. Disagree that additional supporting text is needed as the policy already clearly sets out the importance of sustainable forms of transport.	No change.
Tetra Tech Planning (John Lyon’s Charity obo)	2	TR 02	<p>Transport and Connectivity</p> <p>Do you agree that the Local Plan has identified all of the issues around transport connectivity?</p> <p>We support the inclusion of Policy TR2 ‘Bakerloo Line Extension’ and the requirement for development proposals to optimise the use of land and capacity of sites taking into account the BLE and future improvements to public transport.</p>	Support noted.	No change
SGN (Quod obo)	2 2	TR 02 Figure 12.2	<p><i>Relates to Part 3, LSA SA 01</i></p> <p>Chapter 12 – Transport and Connectivity</p>	Agree that the Local Plan should reference the adopted version of the London Plan. Agree that reference should be made	Local Plan amended to reflect proposed wording and to remove “Draft” from the

			<p>5.20 Policy TR2 is fully supported by SGN to which it is acknowledged that the upgrade of the Bakerloo is fundamental to the realisation of Lewisham’s strategic objectives.</p> <p>5.21 Point C) outlines development proposals on sites within 400m of a new Bakerloo stations will be subject to close scrutiny so that it does not preclude the delivery of the Bakerloo line extension. Figure 12.2 shows the proposed route of the line and potential stations, however, with respect of the stations between Lewisham and Lower Sydenham, the locations of new stations are yet to be confirmed. Accordingly, the following text should be included: <i>Development proposals on sites located within 400 metres of a proposed Bakerloo line station or safeguarded location will be closely scrutinised to ensure that development does not preclude the delivery of the Bakerloo line extension, and further optimises the future accessibility provided by its introduction into the local area. This may include provision for new or improved public realm and infrastructure enhancements.</i></p> <p>5.22 Finally, the Plan refers to the ‘draft London Plan’ throughout. This should be updated following adoption of the London Plan in February 2021.</p>	to safeguarding locations for the BLE.	<p>references to the London Plan.</p> <p>Local Plan amended to reflect BLE safeguarding directions.</p>
WSP (Sainsbury’s Supermarkets Ltd obo)	2	TR 02	<p>Amendments to the Local Plan</p> <p>84. As it will be at least 10 years before BLE considered for funding, there is a strong case for reference to the BLE to be removed from the Local Plan, given that it will blight regeneration and redevelopment that will otherwise come forward in the next 10 years.</p>	Disagree that reference to the BLE should be removed from the Local Plan. The planned growth within the Local Plan is not predicated solely on the delivery of the BLE. Julia???	No change.
L&Q Group	2	TR 04	<p><i>Relates to Call for site</i></p> <p>Whilst we recognise the environmental benefits of ‘car-free’ development, there are parts of the Borough with poor public transport accessibility where greater flexibility for parking should be allowed. We have experienced at the Excalibur where limited car parking in the area of low PTAL (level 1b) has impacted sales rates and values, with knock-on impacts on the scheme viability.</p> <p>Moreover, for estate regeneration proposals in particular, regard needs to be given to re-provision of car parking spaces for existing residents who will be re-housed. This criteria is not included in the sequential approach under Policy TR4(D). To assist with this approach, we suggest that a flexible approach as set out in the London Plan be adopted, which prioritises disabled persons parking but allows other parking provision to come forward subject to further assessment / justification.</p>	Noted. The draft Local Plan parking standards will need to be updated to align with those in the London Plan.	Local Plan parking policies amended to ensure conformity with the London Plan.
Barratt London and the Church Commissioners (Avison Young obo)	2	TR 04	<p><i>Relates to Part 3, LCA SA 20</i></p> <p>Chapter 12 Transport and Connectivity Draft Policy TR4 Parking</p> <p>Barratt London and the Church Commissioners support the application of the London Plan cycle parking standards for all uses and the residential car parking standards as sought by Part B of the Draft Policy.</p>	Noted. The draft Local Plan parking standards will need to be updated to align with those in the London Plan.	Local Plan parking policies amended to ensure conformity with the London Plan.

			<p>With respect to car parking for non-residential uses, Part B also applies the London Plan standard which is car free (with the exception of accessible spaces) for schemes in areas of PTAL 5-6. The Plassy Island site currently provides car parking to serve the existing retail uses, and there may be a commercial and operational need for parking to be re-provided to serve the future occupiers of the new retail/commercial floorspace.</p> <p>We, therefore, request the Draft Policy is amended to state that <i>‘whilst London Plan car parking standards are sought for retail and commercial uses, site specific circumstances will be taken into account including existing parking provision, future commercial and operational needs, and contribution of parking to support wider town centre objectives’</i>.</p> <p>Part E of the Draft Policy states major development proposals should investigate opportunities to integrate space for cycle hubs to accommodate the provision of cycle hire schemes, as well as space for cargo bikes.</p> <p>Part K of the Draft Policy states development proposals for residential and commercial uses will be expected to investigate opportunities to implement rapid electric vehicle charging points, having regard to the Council’s Low Emissions Vehicle Charging Strategy.</p> <p>The current wording of Part E and K is supported as it provides adequate flexibility for schemes to come forward with the most appropriate transport provision determined by relevant site-specific considerations.</p>		
GH L (Leegate) Limited (Frank Knight obo)	2	TR 04	<p><i>Relates to Part 3, LEA SA 03</i></p> <p>Policy TR4 (Parking) states that development proposals will be assessed against the parking requirements set in the London Plan 2021, and parking standards will be considered against existing and future planned Public Transport Accessibility Level (hereinafter ‘PTAL’). Policy TR4 adds a sequential approach will be applied to development proposals for housing where they require the provision of parking.</p> <p>GH L considers that it is inappropriate to set further parking requirements over and above the London Plan Policy T6 (Car parking). Car parking requirements should be determined on a site-by-site basis, as such, justification will be required for the sequential approach to ensure the policy is effective and deliverable.</p> <p>In sustainable locations such as Lee Green District Centre, a reduction or at least consolidation of car parking could be supported. Furthermore, the amount of parking required for new development should be considered carefully in the context of the Government seeking to reduce car ownership and travel. Policies should be encouraging the use of public transport and other forms of sustainable travel, reducing the reliance on private cars.</p> <p>GH L considers that all development proposals in places that are (or are planning to be) well-connected by public transport should minimise the amount of new car parking delivered; this not only encourages use of public transport but also ensures a more efficient use of land. We suggest that the Council adopts a</p>	Noted. The draft Local Plan parking standards will need to be updated to align with those in the London Plan.	Local Plan parking policies amended to ensure conformity with the London Plan.

			flexible approach to car parking which takes account of site-specific circumstances.		
GHL (Leegate) Limited (Frank Knight obo)	2	TR 04	<p><i>Relates to Part 3, LEA SA 03</i></p> <p>Lastly, Policy TR4 states major development proposals that are likely to generate significant number of visitors should review opportunities for space for cycle hubs to accommodate the provision of cycle hire schemes, as well as space for cargo bikes. GHL supports the provision of short-stay cycle spaces in accordance with the London Plan minimum cycle parking standards (Policy T5, Cycle Parking). This further cycle parking requirement first needs to define what LBL considers is a ‘significant number of visitors’ and should also be justified in viability terms. It is GHL’s understanding that there is no justification in the evidence base for an alternative approach to the London Plan. If additional cycle parking requirements are to be set these need to be justified through robust evidence.</p>	Noted. The draft Local Plan parking standards will need to be updated to align with those in the London Plan.	Local Plan parking policies amended to ensure conformity with the London Plan.
Tesco Stores Ltd (Lichfields obo)	2 2	TR 04 Para 12.21	<p><i>Relates to Part 3, LCA SA 06 and LCA SA 19</i></p> <p>Retail Car Parking (Policy TR4)</p> <p>Draft Lewisham Local Plan Policy TR4 B and explanatory para 12.21 state that development proposals should meet the parking requirements and standards set out in the ‘draft’ London Plan. This reference will require updating now The London Plan 2021 (LP) has been published. More significantly, <u>the approach to retail parking in the LLP must now reflect the change at limb G of LP policy T6.3</u>, arising from a policy modification required by the SoS to enabling a less restrictive approach to retail car parking to apply in specified circumstances. Specifically, TC6.3G states:</p> <p><i>“G. Boroughs may consider amended standards in defined locations consistent with the relevant criteria in the NPPF where there is clear evidence that the standards in Table 10.5 would result in:</i></p> <p><i>a. A diversion of demand from town centres to out of town centres, undermining the town centres first approach.</i></p> <p><i>b. A significant reduction in the viability of mixed-use redevelopment proposals in town centre.”</i></p> <p>Over time, there are likely to be reductions in parking demand associated with large scale food retail sites, and a rise in online deliveries. Despite this, pre-pandemic, more than 80% of UK shoppers still carried out a weekly/fortnightly main food shop. The volume of purchases made at a typical weekly/fortnightly shop often means that transporting goods on foot, cycle or by public transport is unfeasible. Therefore, whilst there remains a public desire to shop in this way, it will be necessary to provide appropriate levels of car parking for large food stores to remain viable.</p> <p>A reduction in car parking demand, the use of alternative modes of travel and increase of on-line shopping over time has been evident at the Tesco large stores in Lewisham and Catford. However, car borne main food shopping trips do continue to comprise a sizeable proportion of each store’s turnover. Tesco would not proceed with redevelopment of either store to achieve significant development intensification, if it meant any required replacement store in these town centre PTAL 5-6 locations had to be served by a level of car parking provision less than that required by expected customer demand. To do so would</p>	Noted. The parking standards will need to be updated to align with those in the London Plan.	Local Plan parking policies amended to ensure conformity with the London Plan.

			<p>undermine both the store’s trading and redevelopment viability to the detriment of the Tesco business, shoppers and the vitality and viability of town centres.</p> <p>Accordingly, we <u>recommend an additional paragraph is added to the explanation of policy TR4B(f) on Retail Parking to address the above.</u></p> <p>It is noted that the development guidelines for both Site Allocation SA6 and SA19 include specific guidelines for car parking provision. Specific representations are made on each of these in the sections below.</p>		
QUOD (Landsec obo - Lewisham Shopping Centre)	2	TR 04	<p>Transport and Connectivity</p> <p>12.17Chapter 12 contains key policies in relation to Transport and Connectivity.</p> <p>12.18Policy TR4 B ‘Parking’ confirms the Council’s approach to car free development (for residential and retail) in locations with a PTAL score of 5-6 in line with the standards set out in London Plan Policy T6 ‘Car Parking’.</p> <p>12.19Whilst Landsec are supportive of sustainable transport initiatives and the Council’s ambition for car free development in high PTAL locations, Landsec also recognises that there can be a practical requirement to deliver on-site car parking for family housing in such locations. We consider that Policy TR4 B could include support for on-site parking for family housing, which could negate the risk of overspill parking that could be created by these users who require access to a vehicle.</p>	Noted	Car parking requirements have been amended to reflect those within the London Plan.
Kier Property (Carter Jonas obo)	3 3	Section 13 Table 13.1	<p><i>Relates to Call for site</i></p> <p>Table 13.1 of the Local Plan outlines that a Background Paper has been produced to outlines indicative site capacities. We recommend that with the inclusion of our client’s land, the site allocation is revised and the proposed indicative range outlined in the site allocation is clearly expressed as a <i>minimum</i> to allow for a design-led development that maximises the opportunity available.</p>	Disagree. Table 13.1 states that the figures are indicative. Optimal capacity for the site will be established at planning application stage through a design led approach.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	3	Table 13.1	<p>13 Part Three – Chapter 13 and 14 Lewisham Central Area</p> <p>13.1 Part three of the Reg 18 Plan considers Lewisham’s neighbourhoods, celebrating Lewisham’s diversity and valuing its distinctiveness. To assist with understanding and appreciating Lewisham’s local distinctiveness, and to establish ‘place-based’ priorities for guiding investment and sensitively managing growth and new development, Part 3 of the Reg 18 Plan is organised around five-character areas.</p> <p>Table 13.1</p> <p>13.2 Table 13.1 includes indicative capacities for housing; workspace (gross m²); and town centre use floorspace (gross m²). A net additional requirement is also included (excluding consented development) of 38,327m² workspace and 24,361m² town centre uses.</p> <p>13.3 For consistency workspace should be replaced with employment to reflect the site allocations. For the reasons set out in previous sections of this report, the Reg 18 Plan is not yet supported by an evidence base to support the net additional floorspace figures in Table 13.1.</p>	The Local Plan is supported by an evidence base that is proportionate and responds to higher level policy.	Table 13.1 amended.

Tesco Stores Ltd (Lichfields obo)	3	LCA 01	<p><i>Relates to Part 3, LCA SA 06 and LCA SA 19</i></p> <p>Lewisham Central Area (Policy LCA1) Tesco welcomes the vision and spatial objectives for Lewisham’s Central Area <u>Place Principles</u>, including its focus on the linked but complementary town centres of Lewisham and Catford.</p> <p><u>Tesco supports the ambition of both Policy LCA1B (b) to support “Lewisham major centre’s transition to a metropolitan centre of sub-regional significance” and of LCA1B (c) to support “The comprehensive regeneration of Catford major centre, reinforcing its role as the Borough’s principal civic and cultural hub”.</u></p>	Support noted.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	3	LCA 01	<p>LCA1 Central Area place principles</p> <p>13.4 Chapter 14 Vision and LCA1 for Lewisham’s Central Area confirms that by 2040 development of key strategic sites along with the arrival of the Bakerloo line extension together with the modernisation of Lewisham interchange will have a transformative effect, and will shape Lewisham major town centre into a <i>potential</i> metropolitan centre of exceptional quality (LCA1(B)).</p>	Comments noted.	No change.
Freeths LLP (K/S Lewisham obo)	3	LCA 02	<p>The strategic objectives of Policy LCA2 relating to development requirements in the major centre are also supported and well suited to the Site.</p>	Support noted.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	3	LCA 02	<p>LCA2 Lewisham major centre and surrounds</p> <p>13.5 Policy LCA2(A) Lewisham major centre and surrounds seeks continued investment in Lewisham major centre to enable its transition to a <i>potential</i> metropolitan centre of sub-regional significance in London, and a gateway to the south east, a strategic priority. The policy seeks to ensure that a complementary mix of uses, including new housing, should be delivered “<i>whilst ensuring that the centre’s predominant commercial role is maintained and enhanced</i>”. Landsec would like to explore this objective further with the Council. Maintaining and enhancing the predominant commercial role of Lewisham Town Centre may not represent the necessary flexibility required to secure its vitality and viability.</p> <p>13.6 Policy LCA2(H) seeks “<i>an appropriate mix of main town centre uses at the ground floor level</i>”. Landsec supports this. ‘<i>Retail uses should be concentrated within the Primary Shopping Area, forming the main use across the shopping frontages, and supported with a wider range of complementary commercial, leisure and cultural uses elsewhere.</i>” Landsec supports the objective that retail should form the main uses across the shopping frontage.</p> <p>13.7 Landsec also recognise that retail uses may not comprise the main use across the Primary Shopping Area at ground floor level. The reason for this might be due to the capacity for retail floorspace in the Primary Shopping Area; urban design requirements; Class E which broadens the range of uses; and an evolving understanding of town centre vitality and viability.</p>	We believe the Local Plan strikes the appropriate balance between maintaining the retail function of the town centre whilst providing a degree of flexibility to ensure its vitality and viability.	No change.
Canada Life Ltd (Williams Gallagher obo)	3	LCA 03	<p><i>Relates to LCA SA 22</i></p> <p>Policy LCA3: Catford major centre and surrounds - We support the principles of the policy with the exception of Criteria H which will need to include flexibility around the deculverting the Ravensbourne River for the reasons set out above.</p>	Support noted. Enhancing the river environment is an integral part of improving Catford major centre and surrounds. The policy already provides flexibility as Part H does not require	No change

				deculverting of the River Ravensbourne but rather says development proposals must maximise opportunities to do so.	
Transport for London Commercial Development	3	LCA SA 01	Lewisham’s Central Area: Site Allocation 1 - Lewisham Gateway TfL CD are broadly supportive of the ‘Lewisham Gateway Site’ and consider the allocation for “ <i>comprehensive mixed-use redevelopment comprising compatible main town centre, commercial, community and residential uses</i> ” to be appropriate. TfL CD recognise that the redevelopment of the ‘Lewisham Gateway Site’ has commenced. TfL property interests comprise the Thurston Road Bus stand, which has recently been safeguarded for the BLE, the bus facility at Conington Road, the DLR station and TLRN highway land. In operational terms TfL are also interested in the taxi rank and bus stops and stands on Station Road and bus stops on borough highway.	Comments noted.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02 General	<i>LB Lewisham officer note: The comments below provide an abridged version of the 72 page submission.</i> <i>LB Lewisham officer note: Chapter 1 of the submitted response provides an Executive Summary. It’s content summarises the more detailed points below.</i>	The supplementary information is noted. Our response is set out below.	No change.	
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02 General	<i>LB Lewisham officer note: Chapter 2 of the submitted response provides an Introduction. In summary, Landsec:</i> <ul style="list-style-type: none">- <i>welcomes the opportunity to engage with Lewisham Council.</i>- <i>supports the Council’s ambition for growth and renewal across the borough and within Lewisham Major Town Centre.</i>- <i>undertook a feasibility assessment to rethink the future of Lewisham Shopping Centre.</i>- <i>engaged with Lewisham Council, the GLA, community groups and organisations, market traders, residents, shoppers, and political stakeholders.</i>- <i>recognises challenges - town centres and the way we shop have been rapidly changing due to the growth of online shopping, structural change accelerated by COVID-19, established high street retailers have gone into administration and how town centres are used by local people and retailers will now change forever.</i>- <i>has an ambition to secure a vibrant and vital future for Lewisham Shopping Centre, it may have to be achieved in a new and innovative way supported by a flexible development plan.</i>	The supplementary information is noted. Our response is set out below.	No change.	
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02 General	2.7 Landsec undertook a listening exercise in 2020, focussed on the following six key themes: town centre experience, town centre living, arts and culture, employment, local environment, getting around. 2.8 The consultation involved a six-week consultation period; 10,000 newsletters; contact with 115 community groups and organisations; a consultation website; Facebook advertising to promote the consultation process; two virtual village halls; and street canvassing.	The supplementary information is noted. Our response is set out below.	No change.	

		<p>2.9 Landsec received an excellent response with 2,231 website visits; 732 consultation responses of which 25% responses were from BAME other ethnic groups.</p> <p>2.10 A summary of what people told us is set out below.</p> <p>☑ 60% visited the town centre once a week or less.</p> <p>☑ Change is wanted: people want a cleaner, safer town centre, redesigned shopping centre, and more pedestrian areas.</p> <p>☑ More independent retailers, cafes & restaurants are sought.</p> <p>☑ Lewisham market is popular, but there are strong views about the way it is managed.</p> <p>☑ 71% said new arts and cultural space would improve the town centre.</p> <p>☑ Adding more shops ranked lowest as a positive impact.</p> <p>2.11 There is a strong desire for it to become a vibrant and exciting place again, with recognition for change. Lewisham Shopping Centre is key to that new start with a desire to see more in the town centre than retail, with a strong focus on cultural and other uses such as community and Food & Beverage (“F&B”).</p>		
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02 General	<p><i>LB Lewisham officer note: Chapter 3 of the submitted response provides Landsec’s Vision. In summary it explains:</i></p> <ul style="list-style-type: none">- <i>how Landsec is a market leader in reimagining and growing development in London and the UK,</i>- <i>that rethinking the future of Lewisham Shopping Centre presents a significant opportunity to contribute to the long-term wellbeing of local people by thinking carefully about jobs, skills, business, health, and the environment, creating and implementing social value.</i>- <i>the need for diversification and that Landsec’s reaction to the fundamental changes facing town centres was already in motion prior to the pandemic.</i>	The supplementary information is noted. Our response is set out below.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02 General	<p>3.12 Lewisham Shopping Centre has been at the heart of the town centre for over 40 years and is in need of renewal.</p> <p>3.13 Lewisham Shopping Centre was opened in 1977 as the Riverdale Centre, the largest building in Lewisham town centre. The centre comprised 70 shops set over 3 floors, an 800-space car park, offices, a large internal service road and a disused leisure centre.</p> <p>3.14 The disused leisure centre has been closed for at least 21 years and offered sports facilities such as gymnastics, a five-a-side football, and badminton as well as an indoor crown green bowls court, bar area and function rooms. On the ground floor was the Riverdale Hall, the Obelisk pensioners day centre and Spotlights bar. The Hall hosted a variety of events including an Elvis Presley exhibition, a Christmas ice rink, tea dances, antiques markets, and a Saturday morning cinema club.</p> <p>3.15 The design of the shopping centre (as a covered mall) results in a 100% plot ratio which offers limited opportunities for permeability and urban greening. It is an inclusive and enclosed environment solely reliant on retail occupancy and customer footfall to generate vitality and vibrancy. Without sustained long term</p>	The supplementary information is noted. Our response is set out below.	No change.

		<p>retail occupancy, there is no reason for the local community to visit the centre. It will have an adverse impact on vitality and viability of Lewisham as a whole.</p> <p>3.16 Landsec has tried to keep the centre as occupied as possible however this has its challenges due to the restructuring of the retail sector and in the long term is not a sustainable optimum solution for Lewisham Town Centre. Covid has created a greater issue by accelerating the structural change in retail, and through the loss of many high street retailers has removed current and future tenants. There simply are not the quantity and quality of tenants available to occupy the floorspace in a way which benefits the town centre in the long term.</p> <p>3.17 Lewisham Shopping Centre comprises c.28,000 sqm (NIA) of floorspace of which over a third is vacant; at risk of vacancy; or a short term let/concession. 70% of the floorspace is at ground floor, with 30% at first or second floor. Most of the centre is in retail use, with only a very limited food and beverage offering.</p> <p>3.18 There is also c.6,800sqm of vacant buildings comprising the former Riverdale Hall (c.1,700sqm) and former leisure centre (c.4,500sqm) both of which are disused and have been vacant for many years.</p> <p>3.19 Adjacent to the shopping centre is the popular Lewisham market. Home to a range of stalls selling fruit, vegetables, food and clothing, it has been running since 1906. Immediately to the south of the centre is the Model Market, opened in the 1950s selling model toys it closed in the 2000s, but re-opened to host Street Feast offering pop up drinking and dining experiences.</p> <p>3.20 In 2022 London Borough of Lewisham will be London’s Borough of Culture. To celebrate, the borough will curate a year of arts, cultural events and activities. The borough is home to a number of arts and cultural organisations, of which many are based in the town centre.</p> <p>3.21 Lewisham is a diverse borough with residents who have stories from around the world, Landsec want to make the town centre a place where this diversity is celebrated. Landsec want to find out more about Lewisham’s evening economy and explore opportunities to create a more active town centre later in the day.</p> <p>3.22 The Migration Museum exemplifies the Landsec and the borough’s shared commitment to diversity and openness and already performs an important role for the town centre which could be explored further.</p>		
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02 General	<p>3.23 Landsec’s vision for Lewisham Shopping Centre is set out below.</p> <p><i>Located as the heart of Lewisham town centre, the sustainable and mixed-use transformation of Lewisham Shopping Centre will re-integrate the place within its surrounding fabric, weaving the old and the new to create a layered living neighbourhood above a high performing and vibrant commercial centre. To secure Lewisham’s future, healthy living and flexible working will come together around a diverse leisure and retail offer that caters for all. Increased opportunities for new connections will open the site up to bring the nature in. The place-shaping process will be inclusive and informed by public engagement to build upon what already makes the place special, and ensure the place grows organically over time.</i></p>	The supplementary information is noted. Our response is set out below.	No change.

		<p>3.24 This vision draws on the need for structural change in our town centres to maintain and enhance vital and viable town centres; the views of those consulted during 2020; and the clear policy direction set out in National Policy and the recently adopted London Plan.</p> <p><i>LB Lewisham officer note: Para 3.25 of the submission provides a finer context to this vision, using seven place pillars: rooted, connected, mixed use, multi-cultural, green, healthy and flexible.</i></p> <p>3.33 To achieve this vision, a balanced and flexible approach to planning policies will be required. To achieve a successful ground floor, with active and animated frontages, existing floorspace will have to be removed to make way for new streets and green spaces. Buildings will have to get taller to limit the amount of built footprint at ground floor, creating news spaces that are publicly accessible and engaging, for public benefit.</p>		
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02 General	<p><i>LB Lewisham officer note: Chapter 4 of the submitted response provides an overview of national planning policy and London Plan policy with a specific focus on adaption and diversification of town centres and that the changing role of town centres should be proactively managed.</i></p> <p><i>It also acknowledges the London Plan approach for Lewisham town centre with high residential growth potential, high commercial growth potential protecting small office capacity and strategic night time function and that it forms part of the New Cross/Lewisham/Catford Opportunity Area.</i></p> <p><i>Landsec supports the following findings within the Mayor’s report “Adaptive Strategies for high street renewal” including that there is significant value in London High Streets, the resilience of high streets varies across the city and that high streets are good places for residential intensification.</i></p>	The supplementary information is noted. Our response is set out below.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02 Soundness	<p><i>LB Lewisham officer note: Chapter 6 of the submitted response provides an overview of soundness, that plans should apply a presumption in favour of sustainable development and should seek opportunities to meet development needs of their area and be sufficiently flexible to adapt to rapid change.</i></p>	The supplementary information is noted. Our response is set out below.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02	<p>8.1 In accommodating future growth, the Reg 18 Plan allocates a number of sites for development, including Lewisham Shopping Centre (Site Allocation 2). Within this chapter, we comment specifically on the relevant parts of Site Allocation 2 as they are set out in the Reg 18 Plan.</p> <p>Site Allocation</p> <p>8.2 The allocation comprises Lewisham shopping centre, owned by Landsec, and land outside of the Shopping Centre, including Lewisham House, 25 Molesworth Street and Lewisham High Street, which includes Lewisham market.</p> <p>8.3 Site Allocation 2 is allocated for comprehensive mixed-use redevelopment comprising compatible main town centre, commercial, community, and residential uses.</p> <p>8.4 Landsec support this allocation and whilst the area identified includes more land than Lewisham Shopping Centre, it is felt that this is a positive approach in</p>	Support is noted.	No change.

		securing a comprehensive approach to redevelopment of this important 6.38ha town centre site.		
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02	<p>Indicative Development Capacity</p> <p>8.5 The indicative capacity of the site for 1,579 homes, and gross non-residential floorspace of 20,097 sqm employment and 60,291 sqm main town centre will require further analysis.</p> <p>8.6 Landsec would like to work with Lewisham Council to inform the indicative capacity of the site further and better link this capacity to the objectively assessed needs; deliverability taking into account other policies of the Reg 18 plan; and the urban design principles being promoted which will naturally break up the existing 100% plot ratio reducing the amount of ground floor that will be available for commercial floorspace.</p> <p>8.7 The Council’s site allocation background paper confirms that the indicative site capacities have been derived from the London-wide SHLAA methodology, rather than a needs assessment, or indeed pre-application discussions. This has assumed that Lewisham town centre (Lewisham shopping centre and immediate surrounds) should reflect the need for provision of a significant amount of main town centre uses within the Primary Shopping Area, also commensurate with the objective for Lewisham to be designated a Metropolitan Centre. As discussed above, this ‘potential’ objective must be considered in context. Table 7.1 of the background paper assumes a general mix of 60% residential; 30% main town centre; and 10% employment.</p> <p>Appendix A Table A.2 identifies a slightly different capacity mix of 55% residential; 30% main town centre; and 10% employment; and 5% other.</p> <p>8.8 As this is a significant and complex site, we feel that pre-application discussions represent the most appropriate route to defining indicative site capacity. Whilst SHLAA methodology is a useful starting point, it is a crude land use model which, understandably, is unable to test viability; needs; and site context.</p> <p>8.9 Our initial assessment is that the indicative residential development capacity for the site (1579 homes) results in an under-utilisation of the site. While the Site allocation background paper confirms that the indicative capacities should not be read prescriptively, they mayunintentionally raise local communities’ expectations around the appropriate capacity prior to any design analysis. The actual development capacity of a site will ultimately need to be determined through the detailed design and planning approval process and this should be made clearer in the Reg 18 Plan itself.</p> <p>8.10 As a PTAL 6 central location, the London Plan encourages much greater residential densification, certainly given the potential for metropolitan status. London Plan Policy H1 ‘Increasing housing supply’ requires boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites in order to ensure that housing targets are met. Sites within existing or planned PTALs of 3-6 which are located within 800m of a tube or rail station or town centre boundary are identified as key sources of capacity.</p>	<p>At this time, the pre-application is likely to evolve prior to the submission of a planning application, and so cannot be relied upon to provide a design led capacity for this site. In these instances the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper</p> <p>Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including that the site needs to accommodate significant amounts of non-residential floorspace commensurate with its role within the major town centre, the aspiration to become a Metropolitan town centre and the need to transition appropriately in scale down to the established 3-4 storey that exists along Lewisham High Street and nearby Conservation Area. Based on these considerations, the capacity remains appropriate and should remain the same.</p> <p>Optimal capacity for the site will be established at planning application stage through a design led approach.</p>	No change.

		<p>8.11 As the upper end of the former London Plan density matrix (405dph) would equate to 2,584 homes across Site Allocation 2, we would expect the site to achieve more homes to fully optimise housing delivery, and therefore an indicative capacity of 2,584 homes would be more appropriate.</p> <p>8.12 The London Plan sets out a design-led approach to determining the optimum development capacity of sites. To accommodate the growth identified in this Plan in an inclusive and responsible way, every new development needs to make the most efficient use of land by optimising site capacity. Policy D1 B (3) ‘London’s form, character and capacity for growth’ is clear that boroughs should follow the design-led approach (set out in Policy D3 ‘Optimising site capacity through the design-led approach’) to establish optimised site capacities for site allocations. Landsec welcomes the opportunity to enter discussions to inform this approach.</p> <p>Paragraph 3.3.4 of Policy D3 acknowledges that this should be through a consultative design led approach that allows for meaningful engagement and collaboration with local communities, organisations and businesses.</p> <p>8.13 With regards to the indicative capacity of 20,097 sqm employment and 60,291 sqm main town centre uses, from our early assessment of future needs, and the Council’s own evidence base since 2009, this suggests that there is an oversupply of retail floorspace in Lewisham town centre. We believe that there will need to be an adjustment to these indicative figures.</p> <p>8.14 There will also need to be an adjustment to reflect urban design principles promoted by the Reg 18 Plan. Lewisham Shopping Centre has a site coverage of 100%. To break the centre up, and create new, green permeable routes, there will need to be a reduction in ground floor commercial floorspace to make way for these routes. Owing to the let ability of commercial floorspace, there may be limited scope to replace this floorspace at upper levels across level 1, 2 or 3 for example as retail floorspace does not operate effectively above the ground floor.</p>		
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02	<p>Opportunities</p> <p>8.15 Landsec agrees that the site forms the heart of Lewisham and will play an important role in the enhancement of the town centre. Landsec also agrees that any redevelopment of the site will require significant upfront infrastructure, for example new public realm and transport connections, subject to phasing, necessity, and viability.</p> <p>8.16 The site allocation does not reference the viability challenges of incurring significant upfront cost in the early phases of redevelopment and the potential need to explore grant funding opportunities or flexibility in other policy areas to ensure a viable scheme. The Mayor’s Affordable Housing & Viability SPG (2017) states “<i>it is understood that development proposals on particular sites may not be able to meet affordable housing requirements due to the requirements for significant investment in other contributions to support growth, particularly for public transport (but also for schools and hospitals, cultural venues, affordable work space etc.)</i>”.</p>	<p>Agree with some, but not all, of the points raised in relation to the Opportunities text. Do not agree with the words “should seek to” as securing the long-term future of the market is a pre-requisite to re-developing the site.</p> <p>Policy DM2 already provides an approach for dealing with infrastructure funding and seeks planning obligations on a case by</p>	Lewisham Shopping Centre site allocation amended to refine some of the Opportunities text.

		<p>8.17 The viability constraints of Lewisham Shopping Centre and other sites in the borough is clearly set out in the Local Plan Viability Assessment (BNPP, 2019). The testing identifies that the Lewisham Shopping Centre would be able to deliver between 0% and 30% affordable housing dependent on achievable sales values. The viability testing also excludes any site abnormal costs which will significantly impact viability.</p> <p>8.18 On this basis, Landsec broadly supports the opportunities for development subject to the following.</p> <p><i>“This site forms the heart of Lewisham major centre and includes the Lewisham Market. It is dominated by the shopping centre, built in the 1970s, and the Lewisham House office block. Renewal and modernisation of the shopping centre, will enhance the quality of town centre and help it to achieve metropolitan centre status. Comprehensive redevelopment of the site will enhance the quality of the town centre and will help the Council towards its ambition for potential Metropolitan Town Centre status. Through diversification, redevelopment can deliver a significant amount of new housing on upper floors to contribute towards vitality and viability of the town centre. together with Modern retail and employment space, leisure, cultural and community facilities to will support the long-term vitality and viability of the town centre. Development can also enable transformative public realm enhancements to improve connections throughout the wider town centre area and should seek to secure the long-term future of the market.</i></p> <p><i>Delivery of significant upfront infrastructure and the placemaking costs associated with redeveloping the town centre may impact the viability of development and the ability to deliver a policy compliant level of affordable housing. The Council will work with developers to explore grant funding opportunities and other policy flexibilities.”</i></p>	<p>case basis, taking into account necessary mitigation and site viability. The Plan should be read as a whole.</p>	
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02	<p>Development Guidelines</p> <p>8.19 The Council’s evidence base demonstrates that the site is an excellent location for tall buildings. It is situated in one of the most suitable and less sensitive locations for tall buildings in the Borough. For this reason, there should be no limit to building heights at this location.</p> <p>8.20 Landsec therefore propose the following amendments to bullet six:</p> <p>(Bullet six) <i>“The design of development must respond positively to a site’s position in the wider site allocation area, and to the scale and function of the High Street. The southern end of the site should operate as a transitional zone with more moderately scaled development. Comprehensive redevelopment, including the Beatties Building and Model Market, should establish a new southern anchor to encourage visitors into the heart of the town centre, and help to support pedestrian movement up the length of the High Street. Taller buildings elements may be appropriate across the site but will be encouraged at the northern end of the site and to the west along Molesworth Street.”</i></p> <p>8.21 Landsec supports and encourages visitors into the heart of the town centre and pedestrian movement along the High Street. This can be achieved in many ways, and it would be inflexible to promote a new southern anchor to achieve</p>	<p>Agree with some, but not all, of the points raised in relation to bullet six. Agree to remove the text relating to a new southern anchor, in order to provide some flexibility.</p> <p>Disagree that a new bullet needs to be added to the Development Guidelines. The site is located within an Opportunity Area. Opportunity Areas are key sources of housing supply in London. They are, by their nature, complex to bring forward and often require significant investment in</p>	<p>Lewisham Shopping Centre site allocation amended to refine some of the wording for bullet six.</p>

		<p>this. The concept of an anchor is also prescriptive, and following the structural change in town centres, as a concept may no longer be relevant and should therefore be removed.</p> <p>8.22 Landsec proposes that the challenge of delivering a site in an opportunity area be recognised, aligned to GLA policy. The Mayor’s Affordable Housing & Viability SPG states that <i>“Opportunity Areas and Housing Zones are key sources of housing supply in London. They are, by their nature, complex to bring forward and often require significant investment in infrastructure. They are also of a scale that can create fundamentally new places and communities.”</i></p> <p>8.23 The site allocation should provide an element of flexibility to affordable housing provision as set out in the Mayor’s Affordable Housing & Viability SPG. The SPG states <i>“when considering Opportunity Areas, Housing Zones and industrial land, LPAs may wish to apply a localised affordable housing threshold for the Fast-Track Route”</i>.</p> <p>8.24 Landsec therefore proposes the inclusion of a new bullet point: (Bullet Twelve) <i>“The site is located within an Opportunity Area. Opportunity Areas are key sources of housing supply in London. They are, by their nature, complex to bring forward and often require significant investment in infrastructure. The Council will take into considerationthe viability challenges of the site when assessing the requirements under affordable housing and other policies.”</i></p>	infrastructure. Policy DM2 already provides an approach for dealing with infrastructure funding and seeks planning obligations on a case by case basis, taking into account necessary mitigation and site viability. The Plan should be read as a whole.	
QUOD (Landsec obo - Lewisham Shopping Centre)	LCA SA 02 General	<p><i>LB Lewisham officer note: The submitted response is also accompanied by Appendix 1: Retail tables</i></p> <ul style="list-style-type: none"> - <i>Table 1a: Population</i> - <i>Table 1b: Convenience and Comparison Expenditure per person 2019</i> - <i>Table 1c: Convenience and Comparison Expenditure</i> - <i>Table 2a: Market Shares and Turnover – Convenience Goods 2020</i> - <i>Table 2b: Market Shares and Turnover – Convenience Goods 2021</i> - <i>Table 2c: Market Shares and Turnover – Convenience Goods 2025</i> - <i>Table 2d: Market Shares and Turnover – Convenience Goods 2030</i> - <i>Table 2e: Market Shares and Turnover – Convenience Goods 2035</i> - <i>Table 2f: Market Shares and Turnover – Convenience Goods 2040</i> - <i>Table 3a: Market Shares and Turnover – Comparison Goods 2020</i> - <i>Table 3b: Market Shares and Turnover – Comparison Goods 2021</i> - <i>Table 3c: Market Shares and Turnover – Comparison Goods 2025</i> - <i>Table 3d: Market Shares and Turnover – Comparison Goods 2030</i> - <i>Table 3e: Market Shares and Turnover – Comparison Goods 2035</i> - <i>Table 3f: Market Shares and Turnover – Comparison Goods 2040</i> - <i>Table 4: Trading Performance of Existing Convenience Floorspace</i> - <i>Table 5: Retail Capacity Lewisham Borough (Constant Market Share)</i> - <i>Table 6: Retail Capacity Lewisham Town Centre Only (Constant Market Share)</i> 	The supporting information is noted.	No change.
Freeths LLP (K/S Lewisham obo)	General LCA SA 02	K/S is also supportive of the identification of the Site within the wider proposed allocation of the Lewisham Shopping Centre (Site 2 – page 498-499). Although the Site is allocated within this wider town centre allocation, K/S has also submitted the Site’s availability for development as part of the Call for Sites consultation. This is to be clear on its suitability and availability for development.	Support noted. Agree that delivery of the site is reliant on the cooperation of all land owners across the site.	No change.

		Due to the position of its Site, K/S is committed to playing its part in the regeneration and redevelopment of the Site based on its availability and development potential. To deliver regeneration in this location, it is essential that the requirements and objectives of all landowners and operators are heard and factored into the policy to ensure it is sufficiently flexible and capable of delivery.		
Freeths LLP (K/S Lewisham obo)	General LCA SA 02	To ensure compliance with the NPPF paragraph 35 soundness requirements and particularly that it is an effective and justified allocation, we identify the following: - Evidence Base justification for the development requirements of the allocation. This does not appear to have been tested via any published feasibility / design evidence and requires greater flexibility. Greater flexibility is also needed to allow short-medium term works to buildings in the masterplan area where they otherwise meet the objectives of the Plan (i.e. re-use /conversion of the upper floors for offices).	Comments noted.	No change.
Freeths LLP (K/S Lewisham obo)	LCA SA 02	<p>Development Requirements & Evidence Base</p> <p>We note this allocation is presented based on achieving comprehensive mixed-use development. The opportunity presented by the Site and the allocation is clear and K/S as an important landowner in the allocation is willing and enthusiastic to play its part in working with the Council and Land Securities in delivering the allocation.</p> <p>The Development Requirements outlined in the allocation are detailed and clear in their objectives and requirements. This sets a positive framework for formulating a scheme and promoting development through the planning process. Before the requirements are set and enshrined in the Development Plan, to comply with NPPF paragraph 35 b) it is however important that they are formulated and tested based on a justified and appropriate strategy which has taken into account the reasonable alternatives and based on proportionate evidence.</p> <p>We note that other areas in the Local Plan are based on Opportunity Studies and/or Masterplans (e.g. Catford and New Cross). No Masterplan or Opportunity Study has been prepared by the Council to inform the detailed requirements that are currently proposed.</p> <p>We note the publication of the Draft Tall Buildings Study (Allies and Morrison, February 2021) and the Lewisham Characterisation Study (Allies and Morrison, June 2019). These helpfully identify the allocation area as being capable of intensification including for tall buildings, but neither document provides the direct evidence or link to the actual development requirements proposed for this Site. As a minimum we would expect a companion document to these studies to identify the key development parameters and principles to be used in informing the Site Allocation. These should be tested and then selected based on an assessment of the allocation area and its immediate surroundings together with potential options and alternatives.</p> <p>This is particularly important step in the Evidence Base process where the Allocation extends to such a significant part of the Town Centre and onto plots such as our client's beyond the majority ownerships of the Shopping Centre itself. The guidelines as presently drafted appear to offer the opportunity for increased density and height onto the Shopping Centre elements on the northern</p>	<p>Agree that landowners should work in partnership and in accordance with a masterplan, to ensure the appropriate co-ordination and balance of uses across the site. Policy DM3 already provides an approach for dealing with masterplans and comprehensive development. The Plan should be read as a whole.</p> <p>Following the Regulation 18 public consultation, additional work has been undertaken on the Lewisham Tall Buildings Study which will inform amendments to Policy QD4 Building Heights and the suitability for tall buildings at the Lewisham Shopping Centre site.</p> <p>Agree that this site allocation could be worded more flexibly in relation to tall buildings.</p> <p>Agree that reference should be given to plots of land falling outside of the ownership of Lewisham Shopping Centre and how</p>	Lewisham Shopping Centre site allocation amended to make reference to partnership working, masterplan, Policy DM3, that tall buildings may be appropriate across the site, especially at the north and west of the site and plots of land that do not fall within the ownership of the shopping centre.

			<p>and western parts of the allocation without fairly considering how development and intensification can be located on the central and eastern parts of the allocation including our client’s Site. This needs to be more transparently and fairly tested through a clear and robust evidence base to support the selection of the development guidelines and the overall soundness of the allocation.</p> <p>In the absence of such evidence base, the development guidelines need to be more flexibility worded such that the opportunities and options are considered before a development choice is made. Such an option is identified for the Lewisham House block for example but otherwise decisions on taller building locations have been made without consideration and fair assessment.</p> <p>Our client’s site is for example strategically positioned in the Site and is capable of accommodating additional height and density to support mixed-use including residential. This can for example provide high quality architecture and active frontages which will offer visual interest and identity to enliven and regenerate this particular part of the High Street. It will also positively link with and engage the market and any associated improvements to the Town Centre’s built environment/public realm in this particular location.</p> <p>The potential for this and how the Site can play its part needs to be considered further as part of the evidence base so a clear and sound allocation can be set.</p>	<p>they will be integrated into the wider site allocation.</p> <p>The council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper.</p> <p>Optimal capacity for the site will be established at planning application stage through a design led approach.</p>	
Transport for London Commercial Development	3	LCA SA 06	6 - Land at Conington Road and Lewisham Road (Tesco) As stated in the TfL Spatial Planning response Redevelopment of ‘Land at Conington Road and Lewisham Road’ would require the retention and/or re-provision of the bus stop and stand facility, including driver facilities, which is currently provided within this site allocation.	Agree that existing bus infrastructure should be re-provided.	Land at Conington Road and Lewisham Road (Tesco) site allocation amended by making reference to the re-provision of bus infrastructure.
Tesco Stores Ltd (Lichfields obo)	3 2	LCA SA 06 Para 14.36	Site Allocation 6 : Land at Conington Road and Lewisham Road (Tesco) <u>Tesco supports the proposed 1.53 ha site allocation</u> (para 14.36). Indicative Development Capacity The site is identified as having an indicative development capacity of 380 net residential dwellings alongside 3,802 sqm of gross employment floorspace and 7,604 sqm of gross main town centre use floorspace, following the ‘ <i>standard method + sensitivity</i> ’ approach explained in the Site Allocations Background Paper (SABP) (at para 6.3, tables 6.1 and 7.1 and Appendix A.1 in particular). We appreciate and agree that the development capacity is indicative and is a matter to be determined through detailed design and planning processes (SABP para 6.2). We anticipate that any replacement retail store would not use all of the indicative main town centre use floorspace capacity indicated. Furthermore, the transitional location of the site (explained at LLP para 14.33) makes it less appropriate for the scale of indicative capacity of other town centre uses and employment uses to reflect other town centre sites. Conversely, we anticipate the indicative residential capacity to be much greater than 380 homes. Your ‘standard method’ for an Opportunity Area site with a central setting and 5-6b PTAL, indicates a capacity of (1.53 ha x 450 dwellings/ha) 689 homes. We appreciate there are site specific considerations to address,	<p>The pre-application is likely to evolve prior to the submission of a planning application, and so cannot be relied upon to provide a design led capacity for this site. In these instances the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper</p> <p>Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including that the site</p>	Land at Conington Road and Lewisham Road (Tesco) site allocation amended by increasing net residential units to 407 and reducing employment floorspace to 1,901m².

			<p>including the retention of vehicular access through to the Conington Road site (SA5), but would expect 600 dwellings to be a more appropriate indicative sensitivity figure. (NB. The current planning status of SA5 is that the SoS granted full planning permission for 365 residential dwellings and associated development in January 2020).</p> <p><u>We recommend the indicative development capacity is revised accordingly:</u></p> <table><tr><td>INDICATIVE DEVELOPMENT CAPACITY</td><td>Net residential units 380- 600</td><td>Gross non-residential floorspace Employment < 3,802 Main town centre < 7,604</td></tr></table>	INDICATIVE DEVELOPMENT CAPACITY	Net residential units 380- 600	Gross non-residential floorspace Employment < 3,802 Main town centre < 7,604	<p>needs to accommodate a replacement large supermarket, vehicular access and Silk Mills Path, and that it is an edge of centre site that needs to transition appropriately in scale down to the established low rise properties along Conington Road. Based on these considerations, the the amount of employment floorspace and residential has been amended to reflect the transitional nature of the site.</p> <p>Optimal capacity for the site will be established at planning application stage through a design led approach.</p>	
INDICATIVE DEVELOPMENT CAPACITY	Net residential units 380- 600	Gross non-residential floorspace Employment < 3,802 Main town centre < 7,604						
Tesco Stores Ltd (Lichfields obo)	3 2	LCA SA 06 Para 14.37	<p>Opportunities</p> <p>Tesco agrees the redevelopment of the Tesco superstore, its car park and petrol-filling station, has the potential to provide a significant number of new homes and non-residential floorspace within a highly sustainable town centre location, one lying in a “<i>transitional position from the surrounding residential area leading into the heart of Lewisham major centre ...</i>” (para 14.37). Such mixed-use redevelopment would allow for the repurposing of the retail store site, so as to provide an appropriately sized modern replacement foodstore.</p> <p>Accordingly, we recommend the third sentence of para 14 .37 is revised to read: “ <i>Comprehensive redevelopment and intensification, along with the <u>replacement of the existing retail store or introduction of a wider range of uses, will provide a more optimal use of land to support the long-term viability of the town centre.</u></i>”</p>	Agree that a replacement retail store should be accommodated on-site.	Land at Conington Road and Lewisham Road (Tesco) site allocation amended using the wording proposed.			
Tesco Stores Ltd (Lichfields obo)	3 2	LCA SA 06 Para 14.39	<p>Development Requirements and Guidelines</p> <p>Tesco welcomes the Council’s ambition to make the best use of the land available in line with both NPPF (Chapter 11) and the London Plan (Policies GG2 and D3).</p> <p>Tesco concurs with the appropriateness of the SA6 Development Requirements, save for the detail (not the principle) of the last two bullets on public realm and ecology and amenity value. The detailed provision is matter for the Development Guidelines, explaining how the requirements might be achieved, mindful that there will be alternative ways to do so and that is matter to be determined through masterplanning as part of the design and planning processes.</p> <p>Specifically, we recommend: “including <i>A new public square linked to Silk Mills Path; River restoration and a riverside walk” and “including a riverside walk incorporating the existing bridges with an attractive and robust embankment“</i></p>	Disagree that references to the riverside walk should be moved to the Development Guidelines, as interconnectivity with, and improving, the river is an essential part of redeveloping the site.	No change.			

			are removed from Development Requirements para 14.38 and included in <u>Development Guidelines para 14.39.</u>		
Tesco Stores Ltd (Lichfields obo)	3 2	LCA SA 06 Para 14.39	<p>The <u>Development Guidelines</u> (at para 14.39) give some acknowledgement that an appropriate balance will need to be struck with regards to replacement retail parking with the penultimate bullet point noting ‘<i>Car parking should be the minimum required, reflecting the high level of public transport accessibility of the site</i>’.</p> <p>It is however <u>recommended</u> that this bullet point is amended to give greater clarity in relation to parking associated with any replacement large foodstore as follows: “<i>Car parking should be the minimum required, reflecting the high level of public transport accessibility of the site, whilst recognising the need to provide appropriate levels of car parking to ensure uses are viable, in particular any replacement retail use.</i>”</p>	Comments noted but this text is now proposed for deletion, in order to reduce repetition and ensure clarity in implementing the car parking standards contained in Policy TR4.	All site allocations amended by removing references to car parking.
L&G (Avison Young obo)	- 3	General LCA SA 08	<p>Representation to Lewisham Local Plan Regulation 18 Stage “Main Issues and Preferred Approaches” (Dated January 2021) – Lewisham Retail Park, Loampit Vale</p> <p>We write on behalf of our client, L&G, to submit a representation to the London Borough of Lewisham (LBL) in response to Local Plan: Main Issues and Preferred Approaches consultation document (dated January 2021). The consultation period for this document closes on 11th April 2021. This representation is made specifically in relation to the draft Site Allocation 8: Lewisham Retail Park, Loampit Vale. This letter contains an overview of the site and policy context before making representations on the proposed site allocation.</p> <p>Site Context and Background</p> <p>The site comprising Lewisham Retail Park is situated to the west of Lewisham Town Centre. At present, the site comprises a retail park with four retail units in a linear terrace and associated car parking. The retail park is bound by the A20 and Loampit Vale, which form part of the TfL Road Network, Thurston Road to the east and Jerrard Street to the west.</p> <p>The site is very well served by public transport and has a PTAL rating of 6b (‘Excellent’) due to its proximity to Lewisham DLR and train station, and Lewisham Bus Station.</p> <p>The original planning permission for the retail park was granted in 1989 (ref: DC/02/29055). Since this time, there has been a number of applications for amendments to the retail park including signage applications and applications to amend the amount of food retail floorspace permitted.</p> <p>Most recently, planning permission was granted in March 2019 (ref: DC/16/097629) for: <i>“The comprehensive redevelopment of the Lewisham Retail Park and Nos. 66 – 76 Loampit Vale including the demolition of all buildings on site to facilitate the provision of 4,343sqm of non-residential floorspace comprising (A1) Shops, (A2) Financial & Professional Services, (A3) Restaurants & Cafés, (B1) Business, (D1) Non-Residential Institutions and (D2) Assembly & Leisure uses and 536 residential units in buildings ranging from 4 – 24storeys in height with private and communal</i></p>	The supplementary information is noted. Our response is set out below.	No change.

			<p><i>open spaces, on-site energy centre, car and cycle parking, and associated landscaping and public realm works.”</i></p> <p>The planning permission includes both the Lewisham Retail Park site and nos. 66-77 Loampit Vale which comprise a row of two storey terrace properties. The permission (ref: DC/16/097629) has the following condition attached (Condition 3) which requires the developer to gain control of third party land prior to any works commencing on site: <i>“No development (other than the Enabling Works) shall be carried out under this permission on any land unless and until all legal and equitable interests in the land at 66-76 Loampit Vale have been bound to the provisions of the S106 agreement and title in respect of such interests has been deduced to the LPA.”</i></p> <p>Since planning permission was granted, L&G has successfully secured the acquisition of 66 and 76 Loampit Vale and 68 Loampit Vale has been secured under offer. Despite reasonable attempts, L&G has so far been unable to secure the remaining owning interests in Loampit Vale being:</p> <ul style="list-style-type: none">• 68 Loampit Vale – Leasehold• 70-72 Loampit Vale – Freehold• 74 Loampit Vale – Freehold <p>L&G has been in discussions with the Council regarding the CPO of the third party land, however due to delays associated with COVID this has not been progressed. Meanwhile, L&G are continuing their efforts to secure the remainder of the units.</p> <p>Current Policy Position Within the adopted Lewisham Local Plan, the site falls within the Loampit Vale Policy area as defined in the Lewisham Town Centre Local Plan (LTCLP). As per Policy LTC4, the sites S3a and S3b (which comprise Lewisham Retail Park and the Carpetright site respectively, as shown in Figure 1) have the following site specific requirements:</p> <ul style="list-style-type: none">• <i>“The Council require a comprehensive masterplan endorsed by all landowners for these sites and their surrounds</i>• Taller elements of new development should address Loampit Vale• <i>Building lines may need to be set back to accommodate a dedicated bus lane for turning from Loampit Vale into Jerrard Street and the resultant required depth of pavement</i>• <i>Accessibility to Lewisham transport interchange should be enhanced wherever possible.”</i> <p><i>LB Lewisham officer note: Figure 1: Extract from the Adopted Lewisham Town Centre Local Plan is included in the original representation. It shows the site boundaries located south of Lewisham railway station.</i></p>		
L&G (Avison Young obo)	3	LCA SA 08	<p>Comments on the Local Plan Main Issues and Preferred Approach Document</p> <p>We welcome the opportunity to comment on the draft Local Plan and particularly the draft site allocations contained within this. Overall, L&G are supportive of the inclusion of the draft site allocation for Lewisham Retail Park, Loampit Vale (site allocation 8) and the principle of redevelopment for this site.</p>	Support noted. Policy DM3 already provides advice regarding site masterplans in relation to not prejudicing the future development of other parts of the site and adjoining land, that there should be a	Lewisham Retail Park site allocation amended to make reference to partnership working, masterplan and Policy DM3.

			<p>We note that the draft site allocation contains different parcels of land within multiple ownerships. This includes:</p> <ul style="list-style-type: none"> • Lewisham Retail Park – owned by L&G; and • The row of terrace properties at 66-76 Loampit Vale – multiple ownership as set out above. <p>For this reason, we consider the wording of the draft site allocation is overly prescriptive in requiring comprehensive mixed-use redevelopment for the site as a whole. There are a number of practical implications of delivering comprehensive redevelopment for the Site as a whole and as such, we consider the site allocation should be more flexible to allow the two parcels of land to come forward separately. We consider the site allocation should explicitly acknowledge that individual sites within the allocation can come forward within their ownership restrictions, provided that they have the necessary regard to potential future development on adjacent sites.</p> <p>In order to allow this, we suggest the draft site allocation is more akin to the wording of the currently adopted Policy LTC4 which, as above, requires a comprehensive masterplan endorsed by all landowners in relation to the Carpetright site, Lewisham Retail Park and the row of terrace properties at 66-76 Loampit Vale. In light of this, we consider the site allocation should be amended to require mixed-use redevelopment as part of a masterplan approach in conjunction with current owners, where possible. This would ensure that the site could come forward in phases, if necessary owing to land ownership restrictions, without prejudicing adjacent sites from coming forward.</p>	<p>masterplan covering multiple sites in order to demonstrate the acceptability of the scheme both in terms of its immediate and wider context and that there should be active engagement with the landowners and occupiers of the site along with those in other parts of the allocated site. The Plan should be read as a whole.</p>	
L&G (Avison Young obo)	3	LCA SA 08	<p>The draft site allocation includes an indicative development capacity of 536 net residential units. We acknowledge that this reflects the quantum of residential units as part of the extant planning permission for the site (DC/16/097629). However, this planning permission was granted in 2019 and since this time, there has been a shift in policy and more recent development in the vicinity which have changed the surrounding context.</p> <p>Firstly, within the new London Plan there is a move away from prescribed density ranges and a shift towards a more flexible approach to density. This is reflected in Policy D3 which sets out that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. This approach is also reflected in Policy QD6 of the draft Lewisham Local Plan which states development proposals must demonstrate that the design-led approach has been used to optimise a site’s capacity.</p> <p>In order to demonstrate a design-led approach has been used to optimise a site’s capacity, regard should be had to the site context. Since the original application was granted, there has been a change in the context surrounding the site in terms of the quantum of development and consented building heights. The adjacent Carpetright scheme secured an increase of height to 20 and 35 storeys respectively by way of planning permission DC/19/110610. Further, the former Tesco’s car park site at 209 Connington Road (ref DC/17/101621) has planning permission for mixed-use development in buildings up to 34 storeys in height. A design-led approach to density should also take into account the fact that the site is location within an Opportunity Area, Metropolitan Town Centre and has a very high public transport accessibility level (PTAL rating 6b).</p>	<p>The indicative site capacities reflect the latest planning consent that has been granted. In instances where the extant permission will not be implemented, the site allocation capacity has remained the same unless advanced pre-application discussions have been held with regard to an updated scheme.</p> <p>As this is a town centre site, non-residential floorspace will be an essential component of the development, in order to support the long-term vitality and viability of the town centre.</p> <p>Optimal capacity for the site will be established at planning application stage</p>	Lewisham Retail Park site allocation capacities amended to reflect planning consent granted for the site.

			As such, we do not consider that a restrictive quantum of residential units to be delivered on the site is appropriate nor in line with the design-led approach to optimising site capacity as set out in the London Plan and emerging Lewisham Local Plan. There may be potential to further optimise the capacity of the site in line with the new policy approach and this should follow a design-led approach rather than being restricted by the site allocation.	through a design led approach.	
L&G (Avison Young obo)	3	LCA SA 08	<p>The draft site allocation also includes an indicative development capacity for gross non-residential floorspace of 2,171sqm employment floorspace and 2,171sqm main town centre floorspace, which reflects the quantum secured in the extant planning permission.</p> <p>L&G are pleased to see that the requirement for non-residential floorspace reflects the changes to the Use Class Order and specifically the introduction of Class E by allowing for a broad range of main town centre uses on the site. However, since the original planning permission was granted there has been a series of changes in the retail market, particularly more recently due to COVID which has accelerated the decline in interest for large-scale non-food retail. Conversely, there is demand for smaller format food retailing as well as other types of commercial floorspace. Therefore, we do not think it is appropriate for the site allocation to merely reflect the quantum of non-residential floorspace previously consented, but instead introduce flexibility to take into account the changing retail market and ensure that the most economically viable solution for this site can be secured.</p> <p>L&G are broadly supportive of the other development requirements and development guidelines included within the draft site allocation.</p>	Comments noted. Our response is set out above.	No change.
L&G (Avison Young obo)	- 3	General LCA SA 08	<p>Next Steps</p> <p>We understand that the comments received as part of this consultation will inform the ‘Proposed Submission’ version of the Local Plan, which will be published for public consultation (Regulation 19 stage). We look forward to continued engagement with the Council through the Local Plan preparation process.</p> <p>We look forward to confirmation of receipt of these representations at the earliest opportunity. If you have any queries, please do not hesitate to contact us.</p>	Comments noted. Our response is set out above.	No change.
Eden Park Properties (BPTW obo)	- 3	General LCA SA 17	<p>Re: Representations to the Regulation 18 Lewisham Local Plan 110-114 Loampit Vale, SE13</p> <p>BPTW have been instructed by Eden Park Properties to prepare representations to the Regulation 18 Lewisham Local Plan, relating to 110-114 Loampit Vale, SE13. For context, Eden Park Properties are a family run business which place high-quality design at the centre of their developments. The site has been within EPP’s ownership for many years, and they now wish to progress and work with the Council on achieving a high-quality development in this location.</p> <p>Following the submission of the site to the Lewisham Call for Sites consultation in October 2018, the site has now gained an allocation within the Regulation 18 draft Plan for a mixed-use redevelopment incorporating main town centre, commercial and residential uses (Allocation 17 at Page 533 of the draft Plan). This allocation of the site is supported and welcomed, and we look forward to</p>	Support noted.	No change.

			working with the Council to deliver much needed high-quality housing alongside employment floorspace in the Borough.		
Eden Park Properties (BPTW obo)	3	LCA SA 17	<p>Notwithstanding this, we consider the full extent of the site’s potential has not been recognised within the draft allocation, particularly the number of residential units envisioned (c.29 units). We consider that the site has potential to deliver a high quantum of development than set out within the draft Plan due to the following reasons;</p> <ul style="list-style-type: none"> • The site is currently an underutilised brownfield site, within a highly sustainable location (i.e. within 200m of Lewisham DLR Station / PTAL of 6B). The need for housing within London has never been greater, and sites such as this one should be fully optimised to support the long-term vitality and viability of Lewisham Town Centre. • The site has few planning designations; the existing buildings on site are not locally nor statutorily listed and the site does not fall within a Conservation Area. Given this, the site represents a prime opportunity to enhance development in this location. • The site is located on the edge of Lewisham Town Centre, therefore is located in close proximity to services and facilities. • There are a number of large-scale regeneration schemes within the immediate surroundings of the site including Thurston Industrial Estate. Most of these schemes are now built out, or are currently under construction and provide a clear precedent for height and massing within the area. The site represents an opportunity to provide a transitional massing between the terraces to the west and the taller buildings to the east. • The principle of development for residential uses was previously supported through the previous application on site (LPA Reference: DC/20/118304). <p>Based on the above, we welcome the Council’s conclusion that the site is suited towards a mixed-use development, and to clarify, EPP are committed to re-providing the appropriate employment floorspace on site to achieve the aspirations of the allocation. However, we consider that given the surrounding context of development, and the increasing need for both affordable and market housing within Lewisham, the site should be fully optimised and a higher density development could be supported.</p> <p><i>LB Lewisham officer note: a map is included in the original representation showing the boundary of the site.</i></p> <p>To conclude, we wish to reiterate that EPP are keen to work with the Council to achieve a mixed-use development in line with the aspirations of the New Lewisham Local Plan at 110-114 Loampit Vale. However, to ensure the scheme is viable and fully optimises this brownfield site, we consider that a higher quantum of development can be provided which still takes into consideration the site’s constraints. The site is extremely well connected to public transport and is situated within an area considered suitable for increased development density. The current buildings on site are of low architectural quality, therefore the site offers a prime opportunity to contribute towards meeting the increasing housing targets through the optimisation of a brownfield site.</p>	<p>Where no pre-application discussions have taken place, the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper.</p> <p>Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the re-provision of some employment floorspace on this non designated employment site but also flexibility to introduce town centre uses and the need to transition in this edge of town centre location by continuing the building line to the west of the railway. Based on these considerations, the residential capacity has only marginally increased by 1 unit, although the mix of land uses has changed.</p> <p>Optimal capacity for the site will be established at planning application stage through a design led approach.</p>	110-114 Loampit Vale site allocation amended by increasing net residential units to 30, reducing employment floorspace to 298m² and raising town centre floorspace to 596m².
Eden Park Properties (BPTW obo)	- 3	General	The Council should note that EPP are also committed to delivering development at this site. Since the submission of the Call for Sites form back in October 2018, EPP have been in discussion with BPTW regarding the possible quantum of	Comments noted.	No change.

		LCA SA 17	<p>development on site. Internal discussions have progressed within the Project Team, and EPP now wish to progress towards pre-application within the next month, with the Council. Following this, EPP wish to progress towards a full planning application around Summer 2021.</p> <p>We look forward to working with the Council and delivering the aspirations of the New Local Plan. If you have any queries relating to the representations, then please do not hesitate to get in touch.</p>		
Royal London Mutual Insurance Society Limited (Montagu Evans obo)	- 3	General LCA SA 18	<p>LEWISHAM LOCAL PLAN – CONSULTATION ON MAIN ISSUE AND PREFERRED APPROACHES (REGULATION 18)</p> <p>RAVENSBOURNE RETAIL PARK</p> <p>On behalf of our client, Royal London Mutual Insurance Society Limited (“RLMIS” / “Client”), we write to submit representations for the “Consultation on Main issues and preferred approaches” (Regulation 18) in relation to Ravensbourne Retail Park (the “Site”).</p> <p><i>LB Lewisham officer note: a site location plan is included in Appendix 1 in the original representation.</i></p> <p>These representations are in support of the Lewisham Central Area Allocation 18: Ravensbourne Retail Park and we support the site’s inclusion in the final Local Plan once adopted for the reasons set out in this letter. Notwithstanding this, we consider that there are further refinements to be made to ensure that the site allocation better reflects the recent shifts in planning policy, as well as the local market.</p>	Support noted. Our response is set out below.	No change.
Royal London Mutual Insurance Society Limited (Montagu Evans obo)	- 3	General LCA SA 18	<p>Site Context and Background</p> <p>The Site is located circa 290m north of Bellingham Station. The Site falls outside of the Bromley Road SIL which is located adjacent to the north-western and southern boundaries. The Site also abuts residential development to the north-east, east and west. The Site itself covers an area of 2.71 hectares comprising units one to five of Ravensbourne Retail Park, along with the associated hardstanding car park. These units are currently in use for Retail and Leisure (Gym) purposes totalling 6,729 sqm (GIA), with the split outlined in Figure 1 below.</p> <p><i>LB Lewisham officer note: Figure 1: Split of Uses and Areas is included in the original representation. The table lists the retail and leisure uses (GIA sqm) present in the retail park.</i></p> <p>The Site is well connected, with good access to public transport, which is reflected by its PTAL rating of 4.</p> <p>The buildings on Site are not listed nor is the Site located in close proximity to any listed buildings. A small section of the eastern part of the Site falls within the Curlverley Green Conservation area.</p> <p>The Site was first put forward in the 2015 call for Sites and was subsequently assessed in the London SHLAA (2017) and by the Lewisham Strategic Planning Team (2019). Following this, the Site was given a draft allocation in the Main</p>	Comments noted. Our response is set out below	No change.

			<p>Issues and Preferred Approaches document (Regulation 18) which these representations are submitted in response to.</p> <p>RLMIS has also met with the Lewisham Regeneration Team to discuss the development potential of the Site.</p>		
Royal London Mutual Insurance Society Limited (Montagu Evans obo)	3	LCA SA 18	<p>Emerging Allocation - Lewisham Central Area 18: Ravensbourne Retail Park</p> <p><u>Principle of the Allocation</u> As explained above, the Site has a draft allocation which these representations have been submitted in support of.</p> <p>The allocation promotes the comprehensive mixed-use development of the retail park comprising residential, main town centre and commercial uses. To support these uses, the allocation includes public realm and environmental enhancements, such as new public open space and river restoration. RLMIS is supportive of the draft uses in principle, along with the aforementioned enhancements.</p> <p>RLMIS is keen to ensure that its vision for the redevelopment of the Site is consistent with the objectives of the emerging allocation, as well as the wider borough and the GLA. Likewise, RLMIS supports the identification of the potential of the Site to deliver new jobs and homes in the early phases of the London Plan. We consider that this would contribute to the delivery of much-needed homes and jobs whilst having a positive impact on the surrounding area.</p> <p>The allocation currently shows an indicative capacity as follows:</p> <ul style="list-style-type: none"> • 343 Residential Units; and • 12,786 sqm of Main Town Centre Floorspace. <p>Whilst we are supportive of the emerging allocation and the principle of the uses proposed, the draft allocation proposes almost double the amount of town centre use floorspace compared to the existing provision (6,729 sqm). We are of the view that this draft quantum of town centre floorspace is excessive and does not align with national, regional and local objectives. In addition, such provision does not reflect the character of the prevailing area or the local market. Secondly, we are of the view that in light of the shift in planning context, the Site could be further optimised to provide a greater quantum of both market and affordable residential units. We explain this in greater detail below.</p> <p>Following research into the local market, RLMIS has commissioned an architect to undertake a massing and capacity study to establish the Site’s redevelopment potential. This study demonstrates that the Site can comfortably deliver circa 750 units (circa 300 DPH), along with approximately 2,000 sqm of town centre uses at the lower levels. The massing of this scheme has been advanced based on initial Sunlight/Daylight testing, along with analysis of the neighbouring buildings and an assessment of the public realm and amenity space. Although we have not submitted the detailed studies as part of these representations, we have included an overview of the draft scheme at Appendix 2.</p>	<p>The pre-application is likely to evolve prior to the submission of a planning application, and so cannot be relied upon to provide a design led capacity for this site. In these instances the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Site Allocations Background Paper.</p> <p>Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. We agree that the draft quantum of non-residential floorspace was excessive and we have reduced the employment floorspace element of it accordingly. The indicative capacity has also been tested through the A21 Development Framework that has been endorsed by the council and found that the capacity of residential units is reasonable, taking account of the existing character of the area whilst optimising the site.</p> <p>Optimal capacity for the site will be established at planning application stage through a design led approach. -</p>	<p>Ravensbourne Retail Park site allocation amended to show 367 residential units, 7749m2 gross employment floorspace and 1937m2 gross (-5,719m2 net) town centre floorspace.</p>

			<p><i>LB Lewisham officer note: Appendix 2: Initial Sketch Proposal is included in the original representation. The sketch shows multiple buildings accommodating 750 new homes and 2,000m2 of non-residential development.</i></p> <p>We will submit the detailed supporting information to Lewisham Planning Department in order to arrange a pre-application meeting in due course.</p>		
Royal London Mutual Insurance Society Limited (Montagu Evans obo)	3	LCA SA 18	<p><u>Town Centre Uses</u></p> <p>Firstly, in terms of the indicative quantum of town centres uses, it is pertinent to note that the Site is not located in a Town Centre and falls outside of the adjacent Bromley Road SIL, with the majority of the surrounding area predominately being used for residential purposes. Of particular relevance to this, in the consultation document, part b of the Central Area place principles (LCA1) points out that new employment development is to be concentrated within town centres and the Bromley Road Strategic Industrial Location.</p> <p>In addition, the London Plan takes a strong “<i>town centre first</i>” approach, explaining at paragraph 2.7.1 that:</p> <p><i>“Out-of-centre development can be particularly detrimental to town centres, undermining their economic performance, local character, and the accessibility they provide to a broad range of services, and encouraging increased trips by car”.</i></p> <p>The Plan also explains at paragraph 2.7.5 that:</p> <p><i>“Redevelopment of retail and leisure parks to deliver housing intensification is encouraged, as set out in Policy H1 Increasing housing supply. This should not generally result in an increase of retail or leisure floorspace, taking account of the town centres first approach, the sequential approach to town centre uses, and impact assessments where appropriate.”</i></p> <p>In addition to the above policy context, JLL Retail Agency has undertaken a review of the retail market which has confirmed that retail property in Lewisham is suffering many of the same national oversupply issues. There has been structural change ongoing in the retail sector for over a decade, principally driven by the increasing trend for online shopping. This is resulting in a massive reduction in the requirement by retailers for retail property floorspace. JLL research has estimated (pre-pandemic) that the oversupply requires a reduction of circa 80,000 UK retail units before the supply demand finds its balance again. The COVID crisis has accelerated this change, with a significantly increased demand for online retailing and substantial reduction in the demand for physical retail accommodation.</p> <p>Turning specifically to Ravensbourne Retail Park, the situation is the same. Falling rents reflect the falling demand by tenants who want to rent the space. Tenants are both downsizing their retail footprints and closing stores completely. This has been evidenced on site with the last two lettings being as a result of retail downsizing or closure. Most recently with Harveys going into administration and the new tenant seeking terms at much lower rents. Prior to that, the former</p>	<p>The supplementary information is noted. Our response is set out above.</p> <p>Since the Regulation 18 plan was published, the council has carried out additional studies to consider the impact of Covid-19, including a Town Centres and Retail Study. Findings have informed the Regulation 19 plan.</p>	<p>Ravensbourne Retail Park site allocation amended to reflect a revised land use mix.</p>

			<p>Carpetright unit was let to a health and fitness operator on reduced rental terms, but also with little demand from retailers for the space. This is expected to continue, and whilst tenant failure is still fairly uncommon, we expect tenants to close their stores on lease expiry rather than renegotiate a new lease on similar terms. This situation is unviable for retailers and also for the landlord. Therefore, alternative solutions for the site need to be identified ahead of the leases expiring in 2024.</p> <p>Although we feel that an element of town centre use re-provision is appropriate, we are of the view that given the considerations outlined above, this quantum should be reduced significantly from the current indicative figure to circa 2,000 sqm (which reflects JLL’s market research). Instead, town centre uses should be concentrated in town centre locations as stipulated by regional policy and supported by market research. In turn, this would allow an optimum delivery of much needed market/affordable residential development on the Site, which we feel is a more appropriate use, as explained in greater detail below.</p>		
Royal London Mutual Insurance Society Limited (Montagu Evans obo)	3	LCA SA 18	<p><u>Residential Development</u></p> <p>As outlined above, we support the principle of residential development which has been included in the draft allocation for the Site. However, we consider that given the shift in planning context, the Site should be further optimised to ensure that it <i>“makes as much use as possible of previously developed land”</i> in accordance with Paragraph 117 of the NPPF.</p> <p>From a market perspective, the Site is an exceptional residential location when you consider the transport connectivity, local amenities and lack of competing development. Bellingham station is just a 6-minute walk from the site, with direct services to Central London in less than 30 minutes making it ideal for commuters and working families.</p> <p>Numerous public parks, schools and facilities are located nearby and the site already boasts an attractive green area separating the site from Bromley Road. The River Ravensbourne flows directly west of the site. The surroundings are predominantly residential and would make an ideal neighbourhood for a flourishing new community. New residents would also benefit from their proximity to the amenities of Catford town centre.</p> <p>The scale of the site presents a compelling opportunity to deliver the first major scheme in Catford since the redevelopment of the former Greyhound Stadium. The lack of competing schemes means we would anticipate significant demand in this location from first-time buyers and families.</p> <p>Looking explicitly at housing targets in the Borough, the recently published Annual Monitoring Report 2019-2020 (January 2021) identifies that the Borough has the following Five Year Housing Land Supply:</p> <ul style="list-style-type: none">• Housing Supply – 7,359 dwellings• Five Year Housing Target (London Plan 2016) – 6,925 dwellings (1,385 per annum)• Five Year Housing Target + 5% buffer – 7,271 (1,454 per annum)• Five Year Housing Target + 20% buffer – 8,310 (1,662 per annum)• Five Year Housing Land Supply (5% buffer) – 5.06 Years• Five Year Housing Land Supply (20% buffer) – 4.43 Years	<p>The supplementary information is noted. Despite an increase in the London Plan housing target, the Regulation 19 Local Plan identifies specific deliverable and developable sites with capacity to meet the Borough’s strategic housing target over the plan period. The council can demonstrate a five year housing land supply and has included a Housing Trajectory within the Plan.</p>	<p>Local Plan amended to appropriately refer to the London Plan (2021), its borough-level housing target for Lewisham and period with which this takes effect. In addition, the plan has been amended to remove references to the Local Housing Need (LHN) figure and the standard methodology. Local Plan amended to include an up-to-date Housing Trajectory and five year housing land supply.</p>

			<p>It should be noted that since the above was published the London Plan 2021 was adopted on 2 March 2021. With the Plans adoption, Lewisham’s housing target was increased to 1,667 dwellings per annum, which when substituted into the above calculation results in the following:</p> <ul style="list-style-type: none">• Five Year Housing Land Supply (5% buffer) – 4.2 Years• Five Year Housing Land Supply (20% buffer) – 3.6 Years <p>It is evident that with the adoption of the New London Plan there is increasing pressure on Lewisham to deliver housing, with the new requirement resulting in a lack of a Five Year Housing Land Supply. In addition to this, a revised standardised methodology was published by the government on 16 December 2020, with the updated annual figure for Lewisham being 4,178 dwellings, which further exacerbates housing pressure in the Borough.</p> <p>It is important to note Lewisham’s housing targets in the wider London-wide context, for which the Strategic Housing Market Assessment (“SHMA”) (that informs the London Plan) identified the need for 66,000 additional homes per year. For the purpose of the London Plan, London is considered as a single housing market area, with a series of complex and interlinked sub-markets (see supporting paragraph 4.1.2). The Mayor recognises that the delivery of homes of this scale will require not just an increase in the applications approved, but also a fundamental transformation in how new homes are delivered.</p> <p>Therefore, it is clear that sustainable, previously developed sites should be maximised in order to meet the increased housing pressures in the borough and wider-London. This is outlined in London Plan Policy GG2 (Making the Best Use of Land) which promotes higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. As previously explained, the Site is well connected to public transport and is also located in close proximity to a mix of services and amenities.</p> <p>Overall, we consider that there is a clear need for the draft allocation to further optimise the Site in order to maximise the quantum of market and affordable residential units that can be delivered, which in turn would help meet growing housing pressures. The massing and capacity study that we have undertaken indicates that circa 750 units are achievable. Not only would this increased quantum better reflect the uses of the prevailing area and the market forces at play, but also align more closely with the recent shift in planning policy which places an emphasis on making best use of previously developed land.</p>		
Royal London Mutual Insurance Society Limited (Montagu Evans obo)	3	LCA SA 18	<p>Summary</p> <p>These representations are submitted on behalf of RLMIS in respect of Ravensbourne Retail Park.</p> <p>RLMIS is currently exploring options to redevelop the Site, with the intention of entering into pre-application discussions shortly. As such, we are writing to support the draft Lewisham Central Area Allocation 18 in principle.</p>	The supplementary information is noted. Our response is set out above.	No change.

			<p>However, we consider that there are some tweaks to the quantum necessary in order to more closely align with the shift in planning context and the local market.</p> <p>Firstly, whilst we agree that some level of retail re-provision is suitable, we are of the view that the indicative amount of town centre floorspace is not reflective of the Site’s out of town centre location and omission from the Bromley Road SIL. When combined with the market research we have undertaken, this outlines that a reduced provision of town centre uses is more appropriate in this location, with our research suggesting a quantum of 2,000 sqm.</p> <p>As identified by the Council, the Site is suitable for residential development. However, the additional feasibility work that we have undertaken demonstrates that the Site is capable of delivering greater density (circa 750 units), which would align with the NPPF and the shift of regional policy. This would also better contribute to the growing housing targets in Lewisham and wider-London, as well as helping to facilitate the potential for an increased number of affordable units.</p>		
Royal London Mutual Insurance Society Limited (Montagu Evans obo)	3	General LCA SA 18	We welcome the opportunity to discuss the content of these representations further with the London Borough of Lewisham and are keen to be involved in the forthcoming examination process. In the meantime, should you wish to discuss any of the above please do not hesitate to contact us.	Comments noted. Our response is set out above.	No change.
Phoenix Community Housing (BPTW obo)	3	LCA SA 18	18 & 25 – Ravensbourne Retail Park and other SIL Land at Bellingham growth node (Central Area) – PCH offers its support to the inclusion of residential development here as part of the appropriate mix of uses.	Support noted. Agree with mixed uses at Ravensbourne Retail Park but disagree with residential uses at Bromley Road SIL. Co-location can only take place where SIL is released and compensatory provision of SIL is designated elsewhere.	No change.
Tesco Stores Ltd (Lichfields obo)	3 2	LCA SA 19 Para 14.97	<p>Site Allocation 19: Catford Shopping Centre and Milford Towers</p> <p>Tesco supports the inclusion of its large supermarket and the adjoining multi-storey car park within the 3.42 ha site allocation (para 14.96), comprising compatible retail, leisure, commercial, community and residential uses.</p> <p>Opportunity</p> <p>Tesco agrees that the site forms the heart of the Catford Major Centre and that its transformation should <i>“act as a major catalyst for regeneration, as part of a comprehensive masterplan framework”</i> (LLP para 14.97).</p> <p>The existing Tesco supermarket provides an anchor role within the existing shopping centre, helping to drive footfall into the centre. As such the provision of a modern replacement store, better integrated within the wider town centre,</p>	Support noted. Agree that a replacement retail store should be referenced in the policy.	Catford Shopping Centre and Milford Towers site allocation be amended by referencing a replacement large supermarket.

			<p>should be a key component of the successful regeneration of the site. The draft allocation currently lacks an explicit reference to this, notwithstanding that the Catford Town Centre Framework (Oct 2020) (CTCF) makes several references to the retention of the anchor foodstore.</p> <p><u>We therefore suggest that the penultimate sentence of the para 14.97 be amended</u> as follows: <i>“Comprehensive redevelopment will deliver a significant amount of new housing together with modern retail (including a replacement large supermarket) and employment space, leisure, community and cultural facilities to support long term vitality and viability, and reinforce its role as a civic and cultural hub.”</i></p>		
Tesco Stores Ltd (Lichfields obo)	3 2	LCA SA 19 Para 14..49	<p>Development Requirements and Guidelines</p> <p>Tesco note that the Site Allocation Development Requirements (para 14.98) state that redevelopment of the site <i>“must be in accordance with the Catford Town Centre Masterplan”</i>. That cannot be a requirement of new development if the Masterplan is not part of the LLP and its formal consultation process. This should, <u>we recommend, be a (the first) Development Guideline instead</u>: one indicating <i>“Development <u>should</u> be delivered in accordance with the principles of the Catford Town Centre Masterplan”</i>.</p> <p>It is understood that the CTCF represents an early draft of this Masterplan. That Framework includes multiple references to the retention of an anchor foodstore, including (at para 3.7.4) that the <i>“central location and relatively large plot sizes make the Lanes a suitable location for.... an improved anchor food store to serve existing and new residents.”</i></p> <p><u>We therefore suggest that the fourth bullet point of the Development Guidelines</u> (at para 14.99) be revised to read: <i>“Buildings should provide for a range of footprint sizes to accommodate a variety of town centre commercial and community uses, including a replacement large supermarket, and be designed to provide flexibility to enable subdivision of units.”</i></p>	<p>Disagree that text relating to Catford Town Centre Masterplan should be amended or swapped from Development Requirements to Development Guidelines.</p> <p>Agree that a replacement large supermarket should be referenced in the site allocation.</p>	Catford Shopping Centre and Milford Towers site allocation amended by referencing a replacement large supermarket.
Tesco Stores Ltd (Lichfields obo)	3 2	LCA SA 19 Para 14..49	<p>The Development Guidelines (at para 14.99) note that <i>‘Car parking should be the minimum required to maintain the viability of the town centre, whilst also reflecting the high level of public transport accessibility’</i>. Tesco notes that the CTCF includes indicative layouts and cross sections (on pages 78 and 80) that show a large foodstore with a pedestrian entrance facing Rushey Green and lower ground level car parking accessed from Holbeach Road.</p> <p>To provide clarity and consistent with the CTCF approach, <u>we suggest this Development Guideline is revised</u> as follows: <i>“Car parking should be the minimum required to maintain the viability of the town centre, including that of any replacement large supermarket, whilst also reflecting the high level of public transport accessibility.”</i></p>	Comments noted but this text is now proposed for deletion, in order to reduce repetition and ensure clarity in implementing the car parking standards contained in Policy TR4.	All site allocations amended by removing references to car parking.
Barratt London and the Church Commissioners (Avison Young obo)	- 3	General LCA SA 20	<p>Representation to Lewisham Local Plan Regulation 18 Stage “Main Issues and Preferred Approaches” (Dated January 2021) Barratt London and the Church Commissioners</p> <p>We write on behalf of Barratt London and the Church Commissioners in representation to the Lewisham Local Plan Regulation 18 Stage “Main Issues and</p>	Support and comments noted. Our response is set out below.	No change.

			<p>Preferred Approaches” (Dated January 2021). This document was published for consultation by the London Borough of Lewisham (LBL) in January 2021.</p> <p>Broadly, Barratt London and the Church Commissioners support LBL’s aspiration to proactively respond to population growth and help to meet London’s housing need by positively managing the delivery of new homes across the Borough, and through ensuring that town centres support growth, including in retail, business and cultural activities. We have identified a number points following review of the Main Issues and Preferred Approaches Document which we set out below. We request that LBL consider these matters during the future consultation and preparation stages of its new Local Plan.</p> <p>Context of Representation</p> <p>Barratt London and the Church Commissioners are in the process of working together to jointly prepare redevelopment proposals for the Plassy Island site within the east of Catford Town Centre (please see appended Location Plan for further details). Initial pre-application discussions have been held with Planning Officers.</p> <p>Given that the Plassy Island site comprises an important strategic and brownfield redevelopment opportunity within Catford Town Centre (as identified within the current Draft Catford Town Centre Framework (CTCF)), the emerging Local Plan is hugely relevant to Barratt London and the Church Commissioners’ development aspirations at this stage.</p> <p>Comments on Local Plan Main Issues and Preferred Approaches Document</p> <p>We set out a series of comments below concerning various sections of the Local Plan Main Issues and Preferred Approaches document for your consideration. We follow the general order of topics within the document and respond to pertinent points of particular relevance to our client.</p>		
Barratt London and the Church Commissioners (Avison Young obo)	- 3	General LCA SA 20	<p>Next Steps</p> <p>We would like to thank you for the opportunity to be involved in the ongoing preparation of the Local Plan. We trust that the above comments are clear and helpful.</p> <p>We request that we are kept updated concerning any future consultation stages concerning the Local Plan document.</p> <p>Please do not hesitate to contact us should you require any additional details, or should you wish to discuss any of the above, at this stage.</p>	Comments noted. Our response is set out below.	No change.
Barratt London and the Church Commissioners (Avison Young obo)	3	LCA SA 20	<p>Chapter 14 Lewisham’s Central Area Site Allocation 20. Plassy Road Island Site</p> <p>Barratt London and the Church Commissioners strongly support the principle of mixed use, residential-led development on the Site. We consider the Site to be an integral and important redevelopment opportunity within Catford Town Centre which will ultimately be key to delivering sustainable and long-lasting regeneration benefits locally.</p>	Support noted. Part 3 of the Plan already specifies that they are indicative capacities and that optimal capacity for the site will be established at planning application	Catford Island site allocation amended to make reference to tall buildings.

			<p>The indicative development capacity of 602 residential units, 6,206 sqm of employment and 6,206sqm main town centre uses provides useful context, however, we request the allocation clearly acknowledge that these figures are indicative only, and that the <i>‘final development quantum should be determined through a design-led approach to make the best use of land and optimise development in accordance with the Council’s Draft Local Plan Policy QD6 and London Plan Policy D3’</i>.</p> <p>This approach will ensure that the future development proposals deliver an appropriate level of development for the Site, taking account of the existing and emerging context of the town centre, contributing to its vitality and viability, and the Borough’s housing target. In addition, this will provide flexibility for the design to develop in consultation with planning, design and highways officers at pre-application stage.</p> <p>The development requirements for the draft allocation set out that development must be delivered in accordance with the Catford Town Centre Masterplan. The Draft Catford Town Centre Framework (September 2020) indicates the Site is earmarked for delivery of high-density development including a centrally located taller marker building. We request the draft allocation is amended to refer to this established principle of a taller central marker building, to help ensure consistency between these policy documents.</p>	<p>stage through a design led approach.</p> <p>Agree that a taller building should be located centrally.</p>	
Transport for London Commercial Development	3	LCA SA 20	<p>20 - Plassy Road Island</p> <p>Lewisham Council’s site allocation of ‘Plassy Road Island’, at present, includes several TfL-owned landholdings including 1 – 19 Sangley Road, and 14 (a/b) Brownhill Road. TfL CD recommend that the site allocation boundary be extended to incorporate TfL’s landholding at ‘201 - 205 Rushey Green’ – see image below for TfL landholdings. You should note that the Plassy Road Island site is bounded by TLRN, namely parts of Brownhill Road, Plassy Road, Sangley Road and Rushey Green.</p> <p><i>LB Lewisham officer note: a map showing TFL’s landholdings in the vicinity of the Catford Island site is included in the original representation.</i></p>	<p>Comments noted.</p> <p>Following the Regulation 18 consultation, the site allocation boundary has been re-visited.</p>	<p>Catford Island site allocation boundary has been amended to include TFL owned land at 201-205 Rushey Green (corner plot of Rushey Green and Sangley Road).</p>
Canada Life Ltd (Williams Gallagher obo)	- 3	General LCA SA 22	<p>Williams Gallagher Gallagher act for Canada Life Limited and are instructed to provide comments to the Lewisham Local Plan Regulation 18 Consultation.</p> <p>I would be grateful for confirmation of receipt of these comments.</p> <p>Canada Life owns a large part of Site Allocation 22 (Wickes and Halfords, Catford Road) and have been in dialogue with Lewisham Council to confirm our general support for the development principles set out within the Catford Masterplan and which are in turn reflected within Site Allocation 22 of the Lewisham Local Plan. However, by email dated 5th March 2021 we raised the following matters which the emerging Catford Masterplan and also the emerging Lewisham Plan should take into account:</p>	<p>Comments noted.</p>	<p>No change.</p>
Canada Life Ltd (Williams Gallagher obo)	3	LCA SA 22	<p><i>"Having reviewed the draft document, we wanted to raise some minor points which it would be helpful if the Masterplanning team could take into consideration. We are supportive of the general approach set out in the Masterplan and note that it will be used as evidence to the emerging replacement Lewisham Local Plan which is currently out for Regulation 18 Consultation until 11th April 2021.</i></p>	<p>The site allocation already provides flexibility. The Development Guidelines state that development should maximise</p>	<p>Local Plan amended to make reference to the updated Use Classes.</p>

			<p>Catford Town Centre Framework 2020 Comments:</p> <ul style="list-style-type: none">• <i>p105 - The potential to uncover the Ravensbourne River is supported. However, at this time there is no information to confirm that the statutory bodies for the river support this approach nor has there been a viability exercise to assess the costs of the works. Our client has instructed an engineering consultancy to review both matters and we will report back to the council once the information is available. We do therefore consider that at this stage there should be recognition in the Masterplan principles that if the opening up of the river cannot be achieved due to restrictions by statutory bodies or it is makes development unviable (through robust viability assessment) it will not then be a pre-requisite of the scheme. To be clear, we do consider opening up the river is an important and integral part of the placemaking principles for the site meaning it should only fall away as a pre-requisite where the landowner and council have explored all reasonable solutions to secure delivery.</i>• <i>P106 - The key on the building heights plan does not reflect the colouring on the plan. We believe the dark blue would logically be the 17-20 storey annotation and the colour grading should be corrected in the legend.</i>• <i>p107 - The annotation on the lower level uses need to be updated to reflect the new E Use Class and its associated sub categories (a)-(e) excluding E(g)(iii) industrial processes. A5 would also still need to be included as this is not covered by the Class E."</i> <p>In summary, Canada Life is in the process of assessing the costs associated with deculverting the Ravensbourne River and meeting all other policy requirements for delivery of the emerging Local Plan - including reducing flood risk, safe emergency planning and biodiversity gains. The policy should therefore recognise that if de-culverting the river is not physically / technically possible / viable, this would not preclude the delivery of the site for a high density, residential led mixed-use community.</p>	opportunities to enhance the river, <i>including</i> (but not restricted to) de-culverting.	
(Avison Young obo)	- 3	General LCA SA 25	<p>LEWISHAM LOCAL PLAN: REGULATION 18 CONSULTATION: WRITTEN REPRESENTATIONS</p> <p>OBO FRANK GRIFFITHS</p> <p>These representations are made on behalf of our client, Frank Griffiths, in relation to the Regulation 18 Local Plan Consultation: Main Issues and Preferred Approach to Proposed Changes to the Adopted Policies Map being undertaken by the London Borough of Lewisham. The consultation material comprises:</p> <ul style="list-style-type: none">• Local Plan: Main Issues and Preferred Approaches;• Proposed Changes to the Adopted Policies Map;• Integrated Impact Assessment and Non-Technical Summary;• Habitats Regulation Assessment;• Draft Infrastructure Delivery Plan; and• Relevant Evidence Base, including the Employment Land Review (2019), Site Allocations background paper (2021) and Residential Density Technical Paper (2020). <p>These representations do not intend to respond to all of the policies proposed in the draft Local Plan, rather those that are relevant to the proposed development site at this stage, in particular;</p> <ul style="list-style-type: none">• Site Allocation 25: Land at Randlesdown Road and Bromley Road; and	Comments noted. Our response is set out below.	No change.

			• Draft Policy EC2: Protecting Employment Sites and Delivering New Workspace.		
(Avison Young obo)	- 3	General LCA SA 25	<p>Site Context</p> <p>The site is located at the junction of Randlesdown Road and Bromley Road, Lewisham. It comprises a number of existing buildings and uses as set out in Table 1, below.</p> <p><i>LB Lewisham officer note: Table 1: Existing uses at Randlesdown Road is included in the original representation. It lists the categories of use that current exist on the site.</i></p> <p>The site is well contained at present. It is bordered:</p> <ul style="list-style-type: none">• to the north by Stagecoach Catford Garage (a storage facility for Stagecoach buses) with Bromley Retail Park and residential development beyond;• to the east by the A21, beyond which is a parade of shops and existing residential dwellings;• to the south by a parade of shops adjacent to Randlesdown Road; and• to the west by the Ravensbourne River and Franthorne Way, which provides access to the Bellingham Trading Estate. <p>The shop frontage along Randlesdown Road is located outside of the site boundary. We note that this is being excluded from the proposed SIL designation as per the consultation material, however part of this frontage is within the same ownership and should be included within the Allocation accordingly.</p> <p><i>LB Lewisham officer note: Appendix 1 site plan is included in the original representation. It includes land which has not been included within the draft proposed Allocation area.</i></p> <p>The site is currently accessed from the A21, or alternatively, access can be taken from Franthorne Way via an existing service yard.</p> <p>The frontage of the site is approximately 200m away from Bellingham Train Station (equivalent to a 5-minute walk).</p> <p>The site is located less than 100m from the Bellingham Road bus stop (north) which provides access to a number of services including 54, 136, 208, 320, N136 and N199. Bellingham Road bus stop (south) is located approximately 100m to the site frontage and provides access to the same level of services.</p> <p>The site has a PTAL rating of 4.</p> <p>There are no statutory listed historic assets within, or adjacent, to the site boundary. The nearest heritage assets are approximately 100m to the west and include the Fellowship Inn Pub and attached hall (Grade II), together with a number of residential dwellings to the south east (Grade II). The proposed development is unlikely to result in adverse impacts on these heritage assets.</p> <p>The site is located in Flood Zone 2 and is therefore subject to a medium probability of flooding.</p>	Comments noted. Our response is set out below.	No change.
(Avison Young obo)	-	General	<p>Planning History</p> <p><i>The proposed development site’s planning history is detailed in the Appendix II.</i></p>	The supplementary information is noted.	Randlesdown Road and Bromley Road site

	3	LCA SA 25	<p>The planning history of the site includes three development proposals which have been through two appeal processes. In August 2013, the land at 202 – 210 Bromley Road was subject to an appeal (APP/C5690/A/13/2192356) against the Council refusal to grant planning permission in January 2013 (DC/12/080231/X) for the redevelopment of part of the site for a hotel.</p> <p>In conclusion, the Inspector stated that the development would not harm the future redevelopment of the bus garage, but that the development would harm the supply of industrial land within the Borough. It was noted that the redevelopment for existing land values and development costs refurbishment of the existing buildings or re-development for industrial or storage purposes is not viable.</p> <p>A subsequent appeal process concluded in June 2015 (APP/C5690/A/14/2223342 and APP/C5690/A/14/2223348) against the Council’s refusal to grant planning permission in May 2014 and June 2014 for hotel (DC/14/86542) and residential-led (DC/14/87384) developments respectively.</p> <p>In conclusion, the Inspector states that the development would not be undertaken as part of strategically co-ordinated release from SIL and that the whole range of potential employment uses of the site had not been tested – albeit that five scenarios for employment re-development had been shown to be non-viable.</p> <p>We are also aware that the site has been subject to pre-application advice from Lewisham in respect of its redevelopment to provide an intensification of SIL floorspace, with residential units above (Pre-application Reference: PRE/17/100975). The proposed scheme intended to provide 115 residential units of 4-10 storeys, with parking under a podium, together with 850 sqm of SIL compatible spaces, artists workshops, SME offices. The represented an uplift of 75sqm of SIL floorspace.</p> <p>Lewisham concluded that the development site had a high occupancy level, indicating that it is meeting an identified need and there is ongoing demand for commercial premises in this location.</p> <p>Further, that the site is providing employment and contributing to meeting the Borough’s and London’s economic needs in a sustainable location.</p> <p>Nevertheless, the then London Plan and the adopted Lewisham Local Plan did not support residential development on SIL, a position that has subsequently changed. Furthermore, the Council has subsequently commissioned an Employment Land Review which concludes that the site is poor quality and could be redeveloped.</p>	<p>Mixed-use development is not suitable or deliverable on this designated SIL, as there has been no comprehensive approach to warrant the release of this SIL and no compensatory SIL is being provided elsewhere. Residential use on this site would also compromise the operational use of the adjacent bus garage.</p> <p>The Council is supportive of redeveloping the site for non-residential uses, appropriate to its SIL designation.</p>	allocation has been removed from the Plan.
(Avison Young obo)	- -	General LCA SA 25	<p>Planning Policy Context <i>National Planning Policy Framework (NPPF) (2019)</i></p> <p>The NPPF (2019) sets out the purpose of the planning system, that is to contribute to the achievement of sustainable development. This will be met through three overarching objectives, which are interdependent of each other:</p>	The supplementary information is noted. Our response is set out above.	No change.

		<p>a. <i>“an economic objective</i> – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;</p> <p>b. <i>a social objective</i> – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and</p> <p>c. <i>an environmental objective</i> – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”</p> <p>Chapter 3 of the NPPF states that the planning system should be genuinely planned and that up-to-date development plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic social and environmental priorities; and a platform for local people to shape their surroundings.</p> <p>Paragraph 31 confirms that the preparation and review of all planning policies should be underpinned by relevant and up-to-date evidence: <i>“This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.”</i></p> <p>Paragraph 35 confirms the examination tests which will be applied to new Local Plans and spatial development strategies to ensure they have been prepared in accordance with legal and procedural requirements. Plans will be found ‘sound’ if they are:</p> <ul style="list-style-type: none">• <i>“Positively prepared</i> – providing a strategy which, as a minimum seeks to meet the area’s objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;• <i>Justified</i> – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;• <i>Effective</i> – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and• <i>Consistent with national policy</i> – enabling the delivery of sustainable development in accordance with the policies in this Framework.” <p>Paragraph 36 confirms that these tests of soundness will be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area.</p> <p>Chapter 5 of the NPPF (2019) supports the Government’s objective of significantly boosting the supply of homes. It confirms, that in order to do this <i>“it is important that a sufficient amount and variety of land can come forward where it is needed”</i> (Paragraph 59). Further, Paragraph 67 confirms that <i>“Strategic</i></p>		
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(Avison Young obo)	- 3	General LCA SA 25	<p><i>Planning Practice Guidance</i></p> <p>The NPPF (2019) is underpinned by the Planning Practice Guidance (PPG). It was first published in 2012 as an online resource and has been updated in line with recent iterations of the adopted Framework.</p> <p>Paragraph 34 of the ‘Plan-making’ Guidance (Reference ID: 61-039-20190315) confirms that authorities should prepare their local plans to address future needs and opportunities for their area, explore and identify options for addressing growth and then set out a preferred approach.</p> <p>The ‘Plan-making’ Guidance provides further direction on assessing the suitability, availability and achievability of potential developments sites so as to</p>	The supplementary information is noted. Our response is set out above.	No change.

			<p>understand whether it can be considered for allocation and would be deliverable over the Plan period.</p> <p>This is expanded within the ‘Housing and economic land availability assessment’ Guidance. This sets out the criteria for making a judgement as to whether a site can be considered deliverable within the next five years, or developable over a longer period.</p> <p>The PPG is important when considering site specific allocations, as we discuss in our representations below.</p>		
(Avison Young obo)	- 3	General LCA SA 25	<p><i>Strategic Policy - London Plan 2021</i></p> <p>The London Plan was adopted in March 2021 and provides the strategic planning framework for development within London and the Greater London Area. The Plan considers good growth; spatial development patterns; design; housing; social infrastructure; economy; heritage and culture; green infrastructure and natural environment; sustainable infrastructure; and transport.</p> <p>With regards to employment and commercial land (including industrial, logistics and other services to support London’s economic function), the London Plan confirms at Policy E4 the three tiers for these uses which Local Authority’s should bear in mind during the plan making process. These include:</p> <ul style="list-style-type: none">• Strategic Industrial Locations (SIL)• Locally Significant Industrial Sites (LSIS)• Non-Designated Industrial Sites <p>Policy E5 confirms Strategic Industrial Locations (SILs) should be “managed proactively through a plan-led process to sustain them as London’s largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London’s economy.” Furthermore, the policy wording confirms that opportunities through the plan-making process for the intensification of SIL and co-location of alternative uses should be explored.</p> <p>Policy E7 provides the policy support for the intensification of SIL, noting that Development Plans should encourage the intensification of business uses. The policy wording confirms that</p> <p><i>“Intensification can also be used to facilitate the consolidation of an identified SIL or LSIS to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal.”</i></p> <p>The London Plan therefore promotes and supports the intensification of alternative uses at SIL locations across the Boroughs. It is noted that the intensification of uses should not compromise the industrial and related activities on-site and in surrounding part of the SIL.</p> <p>Figure 6.2 provides a simplified illustration of the approach to the intensification and co-location of alternative uses at SIL (see overleaf). The “After Intensification” section demonstrates how residential uses can be introduced alongside Class B uses such as commercial, B1c and B8 uses.</p>	The supplementary information is noted. Our response is set out above.	No change.

			<i>LB Lewisham officer note: Figure 1: London Plan 2021 approaches to SIL Intensification is included in the original representation. The diagrams show how to intensify sites.</i>		
(Avison Young obo)	- 3	General LCA SA 25	<p><i>Local Plan: Main Issues Document 2021</i></p> <p>Lewisham’s Draft Local Plan sets out a shared vision for the future of Lewisham, together with the planning and investment framework to support its delivery through to 2040. The main objective of the Plan is to achieve ‘An Open Lewisham as part of an Open London’, reflecting the Council’s commitment to positively manage growth. The aspirations of the new Local Plan are to respond to significant changes to the wider planning context, including the adopted of the NPPF (2019) and London Plan (2021); respond to the climate change emergency; realise the objective of an Open Lewisham; meet local needs for genuinely affordable housing, jobs and community facilities; and secure the delivery of the Bakerloo Line extension.</p> <p>Part Two of the Local Plan forms a key part of the Council’s approach to managing new development across the Borough. It includes policies that will help to facilitate the delivery of Good Growth whilst ensuring Lewisham’s distinctness is recognised.</p>	Comments noted. Our response is set out above.	No change.
(Avison Young obo)	3	LCA SA 25	<p>The proposed development site comprises Allocation 25: Land at Randlesdown Road and Bromley Road. This encompasses only part of the wider Bromley Road SIL. The allocation wording confirms the indicative development capacity as being 0 residential units, 3,780sqm gross employment non residential floorspace and 945sqm gross main town centre uses floorspace. The policy wording confirms the current use of the site as being industrial and does not acknowledge the existing residential use on the site, nor the detail of the uses on each of the plots.</p> <p>The supporting text confirms that development must not result in the net loss of industrial capacity, or compromise the functional integrity of the employment location in line with Policy EC2; commercial and industrial uses must be the principal use, supported by ancillary main town centre uses appropriate to the industrial location; development must be delivered in accordance with the A21 Corridor Intensification and Development SPD; form positive frontage along Bromley Road and Randlesdown Road; and deliver new and improved public realm in accordance with a site-wide public realm strategy, including public realm enhancements along Bromley Road and Randlesdown Road.</p>	Comments noted. Our response is set out above.	No change.
(Avison Young obo)	3	LCA SA 25	In the first instance, the Allocation must detail the current uses on site including the 4no. C3 residential units. Furthermore, the draft wording of Policy EC2 is out of date, having been superseded by the omission of the ‘no net loss’ principle from the adopted London Plan (2021).	Comments noted. Our response is set out above.	No change.
(Avison Young obo)	- 3	General LCA SA 25	<p><i>Lewisham’s 5 Year Housing Land Position</i></p> <p>The Council’s 5 Year Housing land Supply position is confirmed in the Council’s Authority Monitoring Report (January 2021). Paragraph 2.7.7 identifies the Council’s committed housing supply that is likely to come forward in the next five years and assesses whether this will be sufficient to meet Lewisham’s identified house requirement. Major and strategic sites, together with small windfalls are likely to provide 7,359 dwellings.</p> <p>Table 6 considers whether this is sufficient to meet the adopted London Plan (2016) targets of 6,925 over five years (1,385 per annum). Table 6 is replicated</p>	Despite an increase in the London Plan housing target, the Regulation 19 Local Plan identifies specific deliverable and developable sites with capacity to meet the Borough’s strategic housing target over the plan period. The council	Local Plan amended to appropriately refer to the London Plan (2021), its borough-level housing target for Lewisham and period with which this takes effect. In addition, the plan has been amended to remove references to

			<p>below for ease of reference and demonstrates that the Council's land supply reduces as the proposed buffers (set out in the NPPF, in line with previous delivery) increase.</p> <p><i>LB Lewisham officer note: Figure 3: Lewisham AMR Housing Supply against London Plan (2016) target is included in the original representation. It shows the number of deliverable years against varying buffers.</i></p> <p>The Council's land supply position is assessed against the previous version of the London Plan. The new London Plan (2021) confirms the Council's 10-year housing delivery targets as being 16,670 dwellings. This equates to 1,667 dwellings per year, an increase of 282 dwellings against the previous target. This will therefore reduce the Council's land supply position below the figures stated.</p> <p>In addition, we note that the Housing Delivery Test measurements indicate a score of 88% for Lewisham over the past 3 years. As a result of this score the Council are required to prepare an Action Plan.</p> <p>Our analysis of the Council's draft housing policies and current 5 year housing land supply position confirms, there is a significant need to identify further sites for housing delivery within the emerging policy context, supported by the intensification of existing sites and co-location of uses.</p>	<p>can demonstrate a five year housing land supply and has included a Housing Trajectory within the Plan.</p> <p>A Housing Delivery Test Action Plan was published in July 2021 and will be updated during Summer 2022.</p>	<p>the Local Housing Need (LHN) figure and the standard methodology. Local Plan amended to include an up-to-date Housing Trajectory and five year housing land supply.</p>
(Avison Young obo)	- 3	General LCA SA 25	<p>We would like to thank the Borough Council for the opportunity to comment of the Regulation 18 version of the Local Plan and would welcome continued engagement with the Council in respect of the proposed development site and plan-making process.</p> <p>Please could you confirm receipt of these representations at the earliest opportunity.</p> <p>Should you required any further information in relation to the site and / or the comments made in these representations then please do not hesitate to contact me</p>	<p>Comments noted. Our response is set out above.</p>	<p>No change.</p>
(Avison Young obo)	3	LCA SA 25	<p><i>Conclusions</i></p> <p>The sites planning history and discussions with our client confirm the existing uses on site range from those included with Class B supported by appropriate Sui Generis uses, together with existing residential (Class C3) uses. The principle of co-locating commercial uses and residential uses as set out in the London Plan 2021 (see below) is therefore already established and are a material consideration in any future Allocation.</p> <p>Our review of the site's planning history, namely the appeal decision relevant to the site, demonstrate that:</p> <ul style="list-style-type: none"> • Given the existing land values and development costs refurbishment of the existing buildings or re-development solely for industrial or storage purposes is not viable. • The principle of intensified Class C development would not compromise the principle future re-development of the adjoining Catford Bus Garage. In this regard, intensified Class C development would not stymie development of the adjoining site. 	<p>The supplementary information is noted. Our response is set out above.</p>	<p>No change.</p>

			In addition to the above, it should be noted that the strategic policy has been updated since the consideration and determination of these applications, which were decided at a time when the colocation of uses was not permitted. The London Plan 2021 strongly supports these principles in order to deliver the identified growth required across the London Borough's.		
(Avison Young obo)	3	LCA SA 25	<p><i>Site Allocation – Main Town Centre Uses</i></p> <p>The Council includes town centre uses within the draft Site Allocation and has suggested that these are necessary for a ‘continuous commercial / shopping frontage at the Bellingham station approach’. It is assumed that the inclusion of main town centre uses refers to ‘other compatible uses’ as explained in Policy EC2 D.</p> <p>The inclusion of town centre uses in the draft Site Allocation is consistent with the requirements of Policies E5 and E7 of the London Plan. However, the inclusions of residential uses are given the same weight as main town centre uses in the aforementioned policies. Given that there is no differentiation in principle, the draft Site Allocation should be revised to include the potential for main town centre uses and / or residential uses on this site.</p> <p>Notwithstanding this, the inclusion of main town centre uses in the Allocation is inconsistent with the Employment Land Review conclusions which itself is inconsistent with its commentary and conclusions for the site.</p>	Comments noted. Our response is set out above.	No change.
(Avison Young obo)	3	LCA SA 25	<p>Site Allocation Methodology</p> <p>In combination with the Site Allocations background paper (2021), the PPG (Plan-making and Housing and economic land availability assessment) provides the basis for examining the proposed development site’s suitability for inclusion within the draft policy wording. The Site Allocations background paper (2021) provides further ‘screening criteria’ in Table 5.1 and the criteria are integrated below</p> <p><i>Existing site allocation or consented scheme</i></p> <p>The site does not have an existing allocation nor a consented scheme.</p> <p><i>Site Size</i></p> <p>The site is at least 0.25 hectares and is considered strategic in size. The Allocation area is currently incorrectly drafted and should be amended to include 4 Randlesdown Road. For clarification, the extent of the site boundary is included in Appendix I.</p> <p><u>Suitability</u></p> <p>Paragraph 18 of the PPG states that:</p> <p><i>“A site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated.”</i></p> <p>The guidance goes on to state that the following can inform plan-making decisions for allocating sites, including:</p> <ul style="list-style-type: none"> • National planning policy; • Appropriateness and likely market attractiveness for the type of development proposed; • Contribution to regeneration priority areas; 	The supplementary information is noted. Our response is set out above.	No change.

		<ul style="list-style-type: none">• Potential impacts including the effect upon landscape features, nature and heritage conservation. <p>In the first instance, the proposed approach to development at the land north of Randlesdown Road (our client’s site) is compliant with the NPPF with regard to sustainable development, namely the re-use of brownfield sites to meet future development needs. As we set out in the planning policy context section of these representations, the Framework identifies a holistic approach to sustainable development as a core purpose of the planning system. It requires the system to perform three distinct and interrelated roles: economic, social and environmental.</p> <p>Our planning policy assessment further identifies the NPPF’s aspiration to support sustainable development which seeks to provide a choice of high-quality homes, support the continued growth of the economy, and improve the conditions in which people live and enjoy leisure through high quality design. Section 11 states that it is a core planning principle to efficiently reuse land which has previously been developed, promote an effective use of land in meeting the identified growth needs of an authority area.</p> <p><i>Employment Land</i></p> <p>The continued employment and commercial uses at our client’s site are no longer suitable, given their size, viability and condition. They are considered to be of poor-quality stock to the remainder of the Bromley Road SIL (see the conclusions drawn in the Employment Land Study, 2019). Para. 5.32 of the Employment Land Review states that a masterplanned approach to the site could see a carefully planned mixed use development safeguarding this area for employment. However, there are no reasonable option for refurbishing or redevelopment the employment uses on site as this is unviable (as demonstrated in the relevant appeals (APP/C5690/A/13/2192356 and APP/C5690/A/14/2223342)).</p> <p>To secure the re-development of the site for employment generating use, the appropriate policy wording drafted in the emerging Local Plan (Policy EC2 and Allocation 25) would need to be updated to positively reflect the co-location of residential uses at this site. This is directed by the London Plan. Indeed, the approach to the intensification and co-location of alternative uses at SIL, as demonstrated in Figure 6.2 of the recently adopted London Plan is entirely characteristic of the development site, given the proximity to other non-employment uses, at the edge of a wider SIL designation and in close proximity to a public transport link, i.e. Bellingham rail station. The reference to the ‘net loss of industrial capacity’ has been removed from the adopted London Plan and instead the direction of the Allocation should be towards ensuring the functional integrity of the SIL is maintained with compatible residential accommodation.</p> <p>This principle can be achieved through the protection afforded the SIL area not within the Site Allocation, i.e. this can come forward for intensification throughout the plan period, but for the Site Allocation to consolidate industrial uses within a mixed-use redevelopment.</p>		
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			<p>Furthermore, the principle of these uses has already been established by virtue of 4 residential dwelling forming part of the existing permitted uses at the site. Our client is amenable to securing continued employment opportunities on the site through alternative, more suitable and employment uses, akin to those underpinning SIL designations, rather than those currently there. This however would have to be underpinned by the co-location of residential development,</p> <p>The proximity to neighbouring employment sites does not preclude the co-location on this site. It has been previously demonstrated at appeal that non-industrial uses can be located adjacent to retained SIL land. In this instance, the site bounds a 24-hour bus garage, however any noise and disturbance can be mitigated through design. The statement in para. 5.32 of the Employment Land Review is entirely disputed. Furthermore, if this adjacent site were to come forward at a future date for redevelopment, any residential scheme within the Allocation would be designed to ensure that the development potential of the bus garage site is not extinguished. In either scenario, the residential use and development would be accommodated in a manner which accords with Policy E5 D of the London Plan.</p> <p>As we demonstrate above (Planning Policy Context) support for residential land is provided within the NPPF.</p> <p>The London Plan further recognises the land capacity issues across the London Boroughs in relation to both employment and housing growth. Indeed, the Mayoral introduction confirms that <i>“dealing with such levels of growth is undoubtedly one of the biggest challenges of our times, putting pressure on land, housing and infrastructure and the environment.”</i> Support for the co-location of uses therefore forms one of the fundamental elements of delivering “Good Growth” in the London Plan.</p> <p>Proposals for the co-location of employment and other compatible uses is therefore supported at a strategic and national level. More broadly, the proposed redevelopment of the site to provide improved commercial and industrial facilities, supported by residential development would be consistent with the Council’s strategic policies for delivering housing and employment growth within Lewisham, and the strategic direction in Policy E5 of the London Plan. Point D of Policy EC2 which confirms general support for co-locating uses, but the principles must be extended to include this part of the Bromley Road SIL and the proposed Site Allocation.</p> <p>Ultimately, the revision of the Site Allocation to include residential development is entirely consistent with the strategic policy for such SIL designations, would achieve the objectives of the Site Allocation, i.e. the intensification and modernisation of the commercial activities on site, would align with the Employment Land Review direction to intensify and safeguard the employment use of the site and would maintain the employment capacity within the Borough.</p>		
(Avison Young obo)	3	LCA SA 25	The below commentary considers in detail the potential impacts of co-locating residential uses at our client’s site, together with the re-provision of existing commercial uses. This indicates that there are no physical or environmental constraints that would preclude the proposed development. We have considered	The detailed assessment of the use of the site for co-location, including viability considerations, is	No change.

			<p>12 criteria to which the suitability of the site should be considered. Taking each in turn.</p> <p><i>Flood Zone</i> The site is located in Flood Zone The site is located in Flood Zone 2 and is therefore subject to a medium probability of flooding. Less vulnerable uses are defined in the PPG (Paragraph 66 Reference ID: 7-066-20140306) as follows: buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in the ‘more vulnerable’ class; and assembly and leisure.</p> <p>The proposed development would provide commercial and industrial uses on the lower floors with more vulnerable uses (residential) located above. Any subsequent planning application would be accompanied by a Flood Risk Assessment which will demonstrate no increase in flood risk onsite or within the vicinity.</p> <p><i>Open space</i> The site does not comprise protected open space.</p> <p><i>Community infrastructure</i> The site does not include any strategic community infrastructure.</p> <p><i>Cultural institutions</i> The site does not include any strategic cultural institutions.</p> <p><i>Heritage Designations</i> There are no statutory listed historic assets within, or adjacent, to the site boundary. The nearest heritage assets are approximately 100m to the west and include the Fellowship Inn Pub and attached hall (Grade II), together with a number of residential dwellings to the south east (Grade II).</p> <p>Given the poor visual and townscape quality of the existing structures on site, the proposed development is unlikely to result in adverse impacts on these heritage assets.</p> <p>A subsequent planning application would be accompanied by a Heritage Assessment which will demonstrate that the development will maintain, and wherever possible enhance the setting of the identified heritage asset(s).</p> <p><i>Strategic infrastructure</i> The site does not include any strategic infrastructure, or any such safeguarded land use designations.</p> <p><i>Air Quality</i> The Council’ s Air Quality Action Plan 2016 confirms the Bromley Road as being located in AQMA 5. This is one of 5 focus areas, although it is noted that this relates solely to Bromley Road and not the surrounding areas (see screenshot below). AQMA 1-6 cover much broader assessment areas.</p>	acknowledged. Our response is set out above.	
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			<p>Any redevelopment of the site would be accompanied by an Air Quality Assessment which will demonstrate that the future occupier of the development will be protected from existing poor air quality in the Borough and the new development satisfactorily minimises further contributions to existing concentrations of particulates and NO2.</p> <p><i>Health and Safety</i> Our review of the Council’s Proposals Map does not indicate that the site falls with any relevant health and safety related zones.</p> <p><i>Social housing estates</i> The site does not form part of a social housing estate.</p> <p><i>Other housing</i> The sites does not include HMOs.</p> <p><i>Biodiversity</i> The Council’s Proposals Map and the Greenspace Information for Greater London website² have been accessed. The former does not indicate that there are any policy constraints associated with biodiversity. Whilst the Greenspace Information website does not provide guidance on biodiversity matter, it does indicate that the site falls within the broader Inner London National Character Area. The associated profile states that “<i>Overall the biodiversity resource is fragmented. Large part of the NCA are deficient in access to nature.</i>” It suggests that this situation is not specific to the site and is equally applicable to the all of the sites located identified for development within the Borough.</p> <p>Given the nature of existing development, the site is considered to be in an area of low biodiversity sensitive. The site is in close proximity to Bellingham Leisure Centre (0.48km to the west) and associated open space, together with Bellingham Children’s Park (0.48km to the west). Forster Memorial Park is located 1.23km to the east.</p> <p>Any future development of the site will be supplemented by a desk-based study and ecological site walkover as part of a Preliminary Ecological Assessment which will include consultation with non-statutory wildlife organisations. This will determine whether there are any records of protected species or important habitats on site, or within a 2km radius which may be impacted by the proposals. In the event that any impacts are identified, an appropriate scheme of mitigation will be identified. The current landowner is happy to enhance the ecological quality of the site by virtue of the scheme’s redevelopment.</p> <p><i>Contamination</i> The use of the site for existing commercial uses would suggest the potential for there to be a level of contamination risk. Any future development would be supported by a desk-based contamination study, which would provide future recommendations and feed into a full remediation strategy to ensure future occupiers would not be subject to harmful contamination.</p> <p><i>Accessibility (PTAL)</i></p>		
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		<p>The TfL PTAL Calculator³ confirms the site has a PTAL rating of 4. This demonstrates the site is highly sustainable with good access to Bellingham Train Station (400m to the east of the site frontage) and 7 bus stops within close proximity of the site. The site on this basis is in a highly accessible location and could support a low-car development supporting the aspirations of the emerging Local Plan with regard to the introduction of low emission vehicles and the targets attributed to reducing carbon emissions. These aspirations are also supported by both the strategic policy context (London Plan) and national policy context (NPPF).</p> <p><i>Other Matters</i></p> <p>In addition to the above, we conclude that the site is within a sustainable location and set in a wider residential context. It is highly accessible with regards to public transport, together with existing amenity.</p> <p>The redevelopment of the site for industrial and commercial uses is unlikely to be achievable without the support of other uses, namely residential. This would be provided through a collocated scheme with ground floor uses designated for employment purposes and upper floors designated for residential uses. The precedent for tall buildings in this location has been tested at appeal (Ref: 13/2192356), with Paragraph 36 of the decision notices confirming that the previous proposals were of a comparable height to the existing buildings to the south of Randisbourne Garden and Delamare Court.</p> <p>Future proposals would take this into consideration and demonstrate a building of suitable scale and massing to the surrounding context. As demonstrated above, the future development of our client’s site would not undermine development proposals associated with the adjacent bus garage. This would be further supported by careful and sensitive masterplanning.</p> <p>Furthermore, the development would accord with the principles A21 Corridor Intensification and Development SPD (when consulted upon and adopted), would align with the Council’s strategic principles for development within an Area of Regeneration (Policy LSA2), and through a design-led approach, would provide a positive frontage along Bromley Road and Randlesdown Road and deliver new and improved public realm in accordance with a site-wide public realm strategy, including public realm enhancements along Bromley Road and Randlesdown Road.</p> <p>We must also reiterate that the principle of residential uses has already been established at the site and thus co-location with commercial and industrial uses, by virtue of 4 existing residential flats contained within the existing site boundary.</p> <p>Availability Paragraph 19 of the Guidance (Reference ID: 3-019-20190722) states that: <i>“A site can be considered available for development, when, on the best information available (confirmed by the Call for Sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development. For example, land controlled</i></p>		
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		<p><i>by a developer or landowner who has expressed an intention to develop may be considered available.”</i></p> <p>The site is being promoted through this iteration of the Local Plan consultation for the co-location of alternative uses, including residential, on a SIL designated site. Frank Griffiths is the existing landowner and is actively seeking the site’s redevelopment.</p> <p>As demonstrated in the commentary contained within these representations, there are no constraints relating to availability which would preclude the proposed redevelopment of the site to include residential use.</p> <p>The landowner has no intention of redeveloping the site in the manner proposed within the draft Allocation and as currently proposed, the site is not available. In the event that the allocation is carried through without residential use included within the accepted use, the Plan is unsound.</p> <p><i>Safeguarded for Alternative Uses</i> The consultation documentation confirms the site is not within or adjacent to any existing or potential safeguarded sites.</p> <p><i>Ownership</i> The site, as demonstrated in Appendix I and as requested to be amended within the Allocation, is within the single ownership of Frank Griffiths and there are no legal or ownership issues which would prevent the site from being delivered within the first five years of the Plan period.</p> <p><i>Existing Uses</i> The site is currently in active use, as set out in the introductory sections of this letter. Notwithstanding this, these uses do not make a substantial or valuable contribution to the SIL and could be re-provided elsewhere within the Borough to more appropriate locations.</p> <p><i>Planning Status</i> We have assessed the Council’s online planning records and understand that there are no live or permitted planning applications associated with the site.</p> <p><i>Potential Delivery Dates</i> Assuming the proposed redevelopment opportunities were to be permitted no later than Q1 of 2022, it is expected that the site would have a potential commencement date no later than Q1 of 2023. This would be within the first five years of the Development Plan and within a timeframe which would help the Council address their give year housing land supply position.</p> <p><i>Achievability</i> Paragraph 20 of the PPG states that: <i>“A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period of time.”</i></p>		
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			<p><i>Site Capacity</i></p> <p>The Site Allocation background paper proposes a 80% : 20% land use mix between employment and main town centre uses in Table A.2 and this ratio is reflected in the proposed Allocation. The Council has no methodology for this ratio, nor does it appear to have been tested via any viability method. In Table A.1, the Council states that the site development capacity has been calculated using the SHLAA methodology, but no such assessment for sites retained in industrial use is included within the SHLAA.</p> <p>In this respect, the Council is Allocating the site without any understanding of the economic viability specifics of the site over the plan period, nor is it based upon any sound methodology.</p> <p>Notwithstanding the above, the Council’s general assumptions for capacity of sites requiring the re-provision of employment floorspace within a SIL co-location site is 67% residential and 33% employment. Clearly, this ratio would need to be tested on this site to ensure that the quantum of relevant floorspaces are viable.</p> <p>Furthermore, much of the existing site is open without any existing floorspace to benchmark against. The Council refers to the 65% plot ratio and the inclusion of floorspace and service yards being included for the purposes of existing employment capacity, however this principle has been omitted from the adopted London Plan. It is instead suggested that the quantum of employment floorspace in any re-development co-location scenario provides the same or more employment opportunities currently provided for on-site, in order to achieve the intensification that is required by the London Plan Policy E7.</p> <p>In assessing the capacity of the site, the Council considers that a density of 225 dwellings per hectare is assumed for a site with a PTAL 4-6 in an urban setting – where there are no sensitives to consider. This figure is contradicted by the average residential density on schemes permitted by the Council within 400m of Bellingham railway station which, according to the Council’s Residential Density Technical Paper (2021) was 396 dwellings.</p> <p>Given the proximity to the railway station, and the local context and character, any residential density would be expected to be significantly higher than 225 units per hectare, and we consider that the stringent application of the Council’s indicative development capacity in a co-location scenario would result in a capacity significantly lower than what could reasonably be delivered through the redevelopment of the site taking a design-led approach to site optimisation.</p> <p>In any event, any indicative residential and non-residential development capacity must be clear in that the figure provided is in no way a cap on development potential.</p> <p><i>Viability Considerations</i></p> <p>The site has been tested at appeal (APP/C5690/A/13/2192356 and APP/C5690/A/14/2223342), the conclusions of which confirm that given the existing land values and development costs associated with the refurbishment or redevelopment of the existing buildings would not be viable.</p>		
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			Any proposals including residential development would be subject to the same viability process as other, similar development proposals. There are no known potential or significant viability constraints on the site associated with co-locating residential uses.		
(Avison Young obo)	3	LCA SA 25	<p>Planning Benefits</p> <p>A range of planning benefits would accrue as a result of the proposed redevelopment of the site. In the context of the three objectives underpinning sustainable development set out in the NPPF, these benefits will include:</p> <p>Objective Planning Benefits</p> <p>Economic</p> <ul style="list-style-type: none">• The redevelopment of the site would seek to re-provide the same level of commercial and industrial opportunities currently existing on site.• The redevelopment of existing stock would create betterment in terms of quality and enhance the SIL designation associated with the site.• An improvement in the quality of commercial building stock would increase the opportunity for new businesses to relocate to the area bringing new jobs for existing residents.• The co-location of residential uses would provide an opportunity to increase spending within the local economy that would support existing and future business. <p>Social</p> <ul style="list-style-type: none">• The site has the capacity to deliver a high proportion of housing in the early phases of the emerging Plan Period which will make an important contribution to meeting the Council's and the GLA housing figures.• A broad mix and size of units will be incorporated into the final proposals which reflect local needs and provide choice for future residents. <p>Environmental</p> <ul style="list-style-type: none">• The are no known biodiversity related constraints associated with the site.• The site's redevelopment provides an opportunity to remediate potentially contaminated land and support and increase in access to amenity areas such as terrace areas and private balconies. <p>As we have demonstrated, the redevelopment of the site for employment uses, together with the co-location of alternative uses such as residential would be an effective and efficient use of land and would represent a form of sustainable development which aligns with the principles and objective of the NPPF and London Plan.</p> <p>There are a number of tangible economic, social and environmental benefits associated with the proposed development site. It further provides an appropriate and sustainable opportunity to deliver a balanced approach to housing and employment infrastructure provision that is a betterment to the existing provision currently provided on site. In addition, there is a significant opportunity to provide employment uses that align better with the objectives of the SIL designation.</p>	The planning benefits associated with redeveloping this site are acknowledged. Our response is set out above.	No change.
(Avison Young obo)	3	LCA SA 25	<p>Conclusions</p> <p>For the above reasons, we conclude that the site is suitable for the redevelopment of commercial uses, supported by the co-location of residential uses. The latter would underpin the former, which as noted would not be otherwise deliverable due to viability constraints.</p>	Comments noted. Our response is set out above.	No change.

			The site allocation should therefore be updated the reflect our conclusions and the principle of co-locating residential uses within the SIL designation.		
(Avison Young obo)	3	LCA SA 25	<p>In addition, we are of the view that the draft allocation wording for Allocation 25: Land at Randlesdown Road and Bromley Road should be updated to reflect the co-location of residential. At present and as demonstrated, the current Allocation renders the Local Plan unsound.</p> <p>As demonstrated in these representations, the site is suitable, achievable and available within the Plan period for the proposed mix of uses, inclusive of residential, and therefore meets the criteria tests test out in the Planning Practice Guidance. The Council has erred in both the principles of future uses on the site and the ratios of uses. The site presents an important opportunity in meeting the Council's identified housing needs for the Plan period.</p> <p>By making the suggested changes, the intensification of the SIL is achieved via a plan-led process and is entirely consistent with national and strategic policies.</p>	Comments noted. Our response is set out above.	No change.
Millwall Football Club (CBRE Ltd obo)	3 3	LNA Spatial Objective 3	<p><i>Relates to Part 3, LNA SA 08</i></p> <p>Our overriding comment is one of support for the principle of what the allocation seeks to achieve. There are, however, amendments that we consider are required to the site allocation to ensure that the key spatial objectives of the Draft Plan are met. Specifically, we refer to Page 561 of the Draft Plan which states that a key spatial objective (3) is to: <i>'Secure the future of Millwall Football Club in the Borough with a modern stadium as part of a new leisure and community destination, supported by a new Overground station.'</i></p>	Comments noted.	No change.
Fifth State and (Avison Young obo)	3	LNA Vision and Spatial Objectives	<p><i>Relates to Part 3, LNA SA 16</i></p> <p>Comments on Lewisham's North Area <i>Draft North Area Vision and Spatial Objectives</i> The Council's vision for Lewisham North Area is strongly supported by the Owners and Developer of 5-9 Creekside. The vision re-imagines Deptford Creek to provide a well integrated employment area and mixed-use neighbourhood. In addition the Creative Enterprise Zone will cement Lewisham's position as a leader in the creative and cultural industries which will feature modern and affordable workspace, including artist studio space, building on the presence of Goldsmith's College, Trinity Laban and Albany Theatre. The objective to establish a Creative Enterprise Zone at Deptford Creekside fits well with the development aspirations Fifth State have for 5-9 Creekside.</p> <p><u>We note that Lower Creekside (Site Allocation 16) is incorrectly labelled as a Strategic Industrial Location in Figure 15.2. This should be amended to reflect the correct designation: Locally Significant Industrial Site.</u></p>	Support noted. Agree that the site is not SIL and should be relabelled accordingly.	Local Plan Figure 15.2 amended by relabelling the site as LSIS.
Artworks Creekside (Avison Young obo)	3	LNA Vision	<p><i>Relates to Part 3, LNA SA 16</i></p> <p>Comments on Lewisham's North Area <i>Draft North Area Vision and Spatial Objectives</i> The vision for the North Area explains that this area will benefit from continue renewal of older employment sites which will influence the areas evolving</p>	Support noted.	No change.

			<p>character whilst helping to improve its environmental qualities. Deptford Creek to provide a well integrated employment area and mixed use neighbourhood.</p> <p>In addition the Creative Enterprise Zone (CEZ), and that the Deptford Creekside Cultural Quarter will grow, and will cement the Borough's position as one of London's leaders in the creative, cultural and digital industries the renewal of industrial sites such as 2 and 3 Creekside.</p> <p>Artworks Creekside have long since supported these principles in their current operations at the two sites and continue to support the Council's ambitions.</p>		
Fifth State and (Avison Young obo)	3	LNA 01	<p><i>Relates to Part 3, LNA SA 16</i></p> <p><i>Draft Policy LNA1 – North Area place principles</i> The Owners and Developer of 5-9 Creekside support Part A of the draft policy which seeks to facilitate Good Growth, regeneration and intensification and renewal of industrial sites in order to promote cultural and creative industries. Whilst Fifth State agree that heritage-led regeneration will be important within the North Area, particularly for areas identified in Part E(a) to (c) (including Royal Naval Dockyard, Grand Surry Canal and Deptford High Street and New Cross High Street), where sites are identified to accommodate growth to support the Council's objectively assessed needs, heritage considerations must be considered alongside public benefits as part of the overall planning balance (this has already been mentioned in response to draft Policies HE2 and HE3).</p>	Agree that heritage considerations should form part of the overall planning balance.	Local Plan amended to include the need for a balanced judgement to be taken.
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	3	LNA 01	<p><i>Relates to Part 3, LNA SA 14</i></p> <p>Lewisham's North Area and Creative Enterprise Zone (CEZ) We note the thrust of Policy LNA1 (North Area place principles) and Policy LNA3 (Creative Enterprise Zone) seeks to deliver regeneration benefits for the locality, including the delivery of creative uses which is supported by our Client.</p>	Support noted.	No change.
Cockpit Arts (The Planning Lab obo)	3	LNA 01	<p><i>Relates to Part 3, LNA SA 14</i></p> <ul style="list-style-type: none"> CA is generally supportive of these principles which reflect aspects of other Plan policies in their application to the North Area, especially those concerning delivery of new employment floorspace and the promotion of creative industries within the Lewisham North Creative Enterprise Zone (see below). 	Support noted.	No change.
Artworks Creekside (Avison Young obo)	3	LNA 01	<p><i>Relates to Part 3, LNA SA 16</i></p> <p><i>Draft Policy LNA1 – North Area place principles</i> Artworks Creekside support Part A of the draft policy which seeks to facilitate Good Growth, regeneration and intensification and renewal of industrial sites in order to promote cultural and creative industries. Part A (c) of Policy LNA1 is strongly supported, whereby the opportunities to provide new and improved workspace through intensification of sites and renewal of employment land is encouraged. The over-arching requirement for comprehensive regeneration of strategic sites to deliver new urban localities, bringing a significant amount of new housing and workspace will ensure that the regeneration potential of the Opportunity Area within which 2 and 3 Creekside are location, will occur.</p> <p>Having met with Council Officers in pre-application discussion, we can appreciate the Council's desire for heritage-led regeneration however this requires a clear</p>	Agree that there should be a balance between heritage led regeneration and other policy objectives.	Local Plan amended to include the need for a balanced judgement to be taken.

			balance against other Policies and objectives contained with the development plan, and ultimately, the planning balance for any redevelopment proposals.		
Fifth State and (Avison Young obo)	3	LNA 03	<p><i>Relates to Part 3, LNA SA 16</i></p> <p><i>Draft Policy LNA3 – Creative Enterprise Zone</i> The creation of a new Creative Enterprise Zone (CEZ) covering the Lower Creekside area is strongly supported by the Owners and Developer of 5-9 Creekside.</p>	Support noted.	No change.
L&Q Group	3	LNA 03	<p><i>Relates to Call for site</i></p> <p>4.8 North Character Area The North Character Area, as described in Chapter 15 of the Local Plan, is one undergoing change. Containing much of the Borough’s employment stock, several larger industrial sites have undergone regeneration, and contemporary mixed use residential and employment schemes have been introduced, including larger tower blocks with taller elements situated on landmark sites. L&Q supports LBL’s vision that regeneration of larger brownfield sites in the area will deliver a significant amount of new housing.</p> <p>L&Q supports North Deptford being included in the Creative Enterprise Zone (Policy LNA3).</p>	Support noted.	No change.
SEGRO (CBRE Limited obo)	3	LNA 03	<p><i>Relates to Part 3, LNA SA 04</i></p> <ul style="list-style-type: none"> Revising the Creative Enterprise Zone Policy to not apply, or to be applied flexibly, within the SILs to ensure that these locations can continue to accommodate businesses that are not necessarily ‘creative’ but which play an essential role in servicing the borough’s other businesses and communities. 	Noted	No change.
SEGRO (CBRE Limited obo)	3	LNA 03	<p><i>Relates to Part 3, LNA SA 04</i></p> <p>7. Cultural Enterprise Zone The points made in part 6. above regarding low cost and affordable workspace apply equally to Policy LNA3 (Lewisham North Creative Enterprise Zone).</p> <p>Part D of Policy LNA3 resists development proposals involving the loss of B1 Use Class workspace that is currently occupied by, or suitable for, uses in the creative and cultural industries, including artists’ workspace. Whilst we support ‘creative’ industries and consider a number of our customers to be defined as such, we are concerned that this requirement in SILs will limit the amount of land that is available for warehousing/logistics facilitates that are more difficult to incorporate into mixed use development and so rely heavily on SILs to provide sufficient supply. As such, we recommend that a further test is added to part D to allow this policy to be applied flexibly in SILs where new development is meeting the needs of occupiers who play an essential role in servicing the borough’s other businesses and communities, and who cannot be easily accommodated in existing available premises in the borough or emerging mixed use developments.</p>	Disagree as the Local Plan seeks the continued growth and evolution of the creative and cultural industries in the north of the borough. SIL will only being released where compensatory provision of SIL can be delivered elsewhere.	No change.
Cockpit Arts (The Planning Lab obo)	3	LNA 03	<p><i>Relates to Part 3, LNA SA 14</i></p> <ul style="list-style-type: none"> Cockpit Arts enjoys an international profile and reputation in its field, which we suggest should be recognised in the plan (alongside other listed organisations). We regularly deliver overseas programmes and welcome visitors from around the globe wanting to learn from our model. 	Support noted. Agree that maker space has different requirements from digitally driven creative businesses but this does not need to be specified in policy. Also	Local Plan amended by clarifying the requirement of maker space in LNA 03 and by clarifying that masterplanning must

			<ul style="list-style-type: none"> • We endorse this policy, specifically the protection and enhancement of workspace provision at Deptford Creekside and the commitment to ensure a wide range of creative workspaces and affordable employment floorspace comes forward (not just 'arts'). • We query how this policy will be applied to applications already under consideration in the CEZ which do not meet the policy requirements, with specific reference to the Sun Wharf scheme under consideration, which does not appear to deliver on this policy's expectations around employment floorspace. • How will this policy be retrospectively applied to applications already under consideration in the CEZ which have the potential to limit the growth of specific creative workspaces e.g. the Sun Wharf scheme/Cockpit Arts. • We query what is meant by 'high quality' in relation to new workspace and would emphasise that, whilst there are minimum requirements for all types of spaces (proper heating, facilities, etc.) this differs for maker space vs. office space for creative businesses. 	agree with the points made about masterplanning and co-ordination of applications.	ensure that initial phases of development do not hinder the latter phases.
Artworks Creekside (Avison Young obo)	3	LNA 03	<p><i>Relates to Part 3, LNA SA 16</i></p> <p>Draft Policy LNA3 – Creative Enterprise Zone Artwork Creekside support the principles within draft Policy LNA3 for the designation of a Creative Enterprise Zone. The client reserves the right to comment further upon '<i>an appropriate range of rents</i>', in the same manner that it awaits guidance in an Affordable Workspace SPD.</p>	Support and comments noted.	No change.
The Renewal Group (Carney Sweeney obo)	3	LNA 03	<p><i>Relates to Part 3, LNA SA 08</i></p> <p>Policy LNA3 Creative Enterprise Zone This policy needs to be updated to have regard to the changes to the London Plan prior to its final adoption and publication. It also needs to be updated to have regard to the changes to the Use Classes Order, in particular new Use Class E and the imminent amended permitted development rights later this year. The Inspector considering the Westminster Local Plan in 2020 made clear the importance of this.</p>	Agree that the Local Plan needs to align with national and regional policy.	Local plan amended to make consistent references to new use classes and permitted development rights, and to align with the adopted version of the London Plan.
Artworks Creekside (Avison Young obo)	3	LNA 04	<p><i>Relates to Part 3, LNA SA 16</i></p> <p>Draft Policy LNA4 – Thames Policy Area and Deptford Creekside The pre-application discussions to date in relation to 2 Creekside have considered the relationship to Deptford Creek. Artwork Creekside appreciate the benefit of a positive relationship with the Creek; however it must not be an explicit requirement to provide public access to the Creek within a development site. The caveat to ensure accessible public space, '<i>where possible</i>', must be maintained throughout the Plan process.</p> <p>Furthermore, it appears unnecessary to ensure that special regard is paid to the significance of heritage assets and their setting under this Policy. The impact upon designated and non-designated assets are appropriately dealt with under the respective Policies.</p>	Disagree, public access along Deptford Creek and the maritime and industrial heritage of the area are important features of this riverfront area and it is important that this policy makes reference to these attributes.	No change.
SEGRO (CBRE Limited obo)	- 3	General LNA SA 04	SEGRO RESPONSE - REGULATION 18 DRAFT LOCAL PLAN CONSULTATION CBRE Limited is instructed by SEGRO to make representations to the London Borough of Lewisham Local Plan (Main Issues and Preferred Approaches) Regulation 18 consultation (hereafter "draft plan"). We set out below our overarching comments on the draft plan and our specific comments relating to the Deptford Trading Estate, which SEGRO owns and manages.	Comments noted.	No change.

SEGRO (CBRE Limited obo)	- 3	General LNA SA 04	<p>SEGRO</p> <p>SEGRO is a UK Real Estate Investment Trust (REIT), and a leading owner, manager and developer of modern warehouses and light industrial property. It owns or manages 6.4 million square metres (69 million square feet) of space, serving customers from a wide range of industry sectors.</p> <p>In Greater London, its portfolio extends to over 12.5 million square feet of light industrial and urban logistics space and is home to over 420 customers operating from 55 estates across the capital. These customers, which include major businesses such as Rolls Royce, Brompton Bike, British Airways, Ocado, John Lewis, DHL, employ over 20,000 people and operate in a range of sectors from e-retailing to manufacturing, TV and media to aerospace and automotive to food production.</p> <p>In February 2017, SEGRO launched its ‘Keep London Working’ report to highlight the importance of industrial land to London’s economy and productivity, the structural changes the sector is experiencing and the challenges it faces with the excessive release of industrial land for high value uses, such as housing.</p> <p>The report focussed in particular on urban logistics, which involves the movement of goods and services across the City. Urban logistics is a key element of London’s industrial sector, including in LB Lewisham, where such facilities are needed to ensure that the borough’s residents and businesses have timely access to the goods they need to thrive. Demand for these facilities will increase with the growth in the population and business that is planned for the next 15 years. The report can be accessed here.</p>	The supplementary information is noted.	No change.
Lendlease (Lichfields obo)	- 3	General LNA SA 02	<p>Lewisham Local Plan Regulation 18 Consultation- April 2021</p> <p>We write on behalf of our client, Lendlease, in response to the above consultation. Lendlease welcome the opportunity to engage with London Borough of Lewisham (LBL) on the new Local Plan.</p> <p>Lendlease is committed to bringing forward a high quality and deliverable scheme on the Deptford Landings development site (formerly known as Timber Yard/Deptford Wharves) which was granted Hybrid Planning Permission in March 2016 (ref. DC/15/92295). This site is allocated within the draft Local Plan as North Area Site Allocation 2, Timberyard, Deptford Wharves.</p> <p>This letter sets out Lendlease’s response to the Regulation 18 stage ‘Main Issues and Preferred Approaches’ version of Lewisham’s draft Local Plan dated January 2021. Following some general comments, the response will be organised in accordance with the themes set out on the consultation webpage.</p> <p>Background</p> <p>On 23 March 2016, hybrid planning permission was granted by LBL for the comprehensive mixed use redevelopment of land bounded by Oxestalls Road, Grove Street, Dragoon Road and Evelyn Street (excluding Scott House, 185 Grove Street) formerly known as The Timberyard and now named Deptford Landings. The scheme comprises six Plots, including detailed planning permission for the first phase of development, Plots 1, 2 and 3 (ref. DC/15/92295).</p>	Support, comments and supplementary information are noted.	No change.

			<p>This permission was granted for up to 10,413sqm of non-residential floorspace (A1/A2/A3/A4/A5/B1/D1/D2 and an energy centre) and up to 1,132 residential units in buildings ranging from 3 storeys to 24 storeys in height, including detailed planning permission for up to 562 residential units and up to 5,692sqm of non-residential floorspace (A1/A2/A3/A4/A5/B1/D1/D2) in buildings ranging 3 storeys to 24 storeys in height. The detailed part of the hybrid planning permission covers Plots 1, 2 and 3.</p> <p>The planning permission has subsequently been amended by several non-material amendment (NMA) applications. Lendlease is currently proposing a number of amendments to the approved masterplan for the site and has engaged in pre-application discussions with the Council in relation to optimisation of the site. Lendlease therefore welcome the opportunity to engage in the local plan process and are supportive of LBL’s aspirations for the Borough.</p> <p>Below is a summary of the key areas which Lendlease would like to comment on.</p>		
Lendlease (Lichfields obo)	- 3	General LNA SA 02	<p>Ease of use</p> <p>Overall, at 870 pages in length, the draft Local Plan contains a huge breadth of detailed guidance and in some places is repetitive or duplicates existing London Plan 2021 or national policy. National Planning Practice Guidance states that ‘<i>all plans need to be as focused, concise and accessible as possible</i>’ (para. 002 ref. 61-002-20190315). The plan would form a more usable and accessible document if it was more concise and did not seek to unnecessarily repeat information provided elsewhere.</p> <p>The National Planning Policy Framework (2019) states that plans should ‘<i>serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area</i>’ (para. 16). The London Plan 2021 and NPPF form part of Lewisham’s Development Plan, therefore, it is not necessary to repeat the requirements contained in these documents in the Local Plan. To give one example, much of Local Plan Policy QD2 (Inclusive and Safe Design) replicates existing London Plan 2021 policies D5 (Inclusive Design) and D7 (Accessible Housing). More examples are highlighted in the following response; however, this is not a comprehensive list and we recommend a thorough review of the plan to remove unnecessarily duplicated policy.</p> <p>The aspirations of the White Paper ‘Planning for the Future’ (August 2020) should also be taken into consideration when preparing the Lewisham Local Plan. One of these aspirations being that local plans significantly reduce in size, by at least two thirds, following a defined template, with the NPPF becoming the primary source of policies for Development Management and local plan policies restricted to clear and necessary site or area specific requirements.</p>	Policies have been included within the Local Plan where they provide useful local interpretation, to aid the implementation of national policy or London Plan policies. However, agree to review the plan to identify unnecessary duplication.	Local Plan amended to reduce repetition thereby shortening the length of the Local Plan.
Lendlease (Lichfields obo)	- 3	General LNA SA 02	<p>Summary</p> <p>Lendlease welcome the opportunity to comment on the emerging Lewisham Local Plan and are keen to continue to engage especially in relation to the Deptford Landings site. Lendlease’s views and comments should be carefully considered and addressed, to ensure that the delivery of high-quality development at Deptford Landings continues smoothly.</p>	Comments noted.	No change.

			<p>Lendlease is supportive of Lewisham’s aspirations in the Local Plan, particularly in relation to design quality, inclusive design, placemaking and public realm, and driving sustainability standards. However, changes to the document are necessary to ensure it is concise and accessible, avoiding unnecessary repetition of existing policies. Furthermore, Lendlease’s comments with the site allocation for the Deptford Landings site have been detailed above and need to be addressed.</p> <p>Should you wish to discuss comments within these representations further please do not hesitate to contact us.</p>		
Lendlease (Lichfields obo)	3	LNA SA 02	<p>Lewisham’s North Area North Area Site allocation 2 – Timber Yard, Deptford Wharves</p> <p>This policy refers to the site owned by Lendlease where development is ongoing in accordance with the approved masterplan Catford1 (DC/15/092295). Overall Lendlease support the development guidelines and requirements, and these reflect Lendlease’s objectives for the site. However, it is questioned whether this site allocation is necessary considering the site has an extant planning permission secured by the Hybrid Planning Permission which contains the development parameters and masterplan for the site. Therefore, the site allocation is duplicating this information. This should be reviewed in due course as part of the Local Plan preparation in the context of the amended proposals coming forward for the site and the timing of their delivery.</p> <p>Assuming the allocation remains, Lendlease request that the Local Plan refers to the site as ‘Deptford Landings’ for clarity and consistency with the name of the development currently being used. It could be added that the site was previously referred to as Oxestalls Road in the Core Strategy.</p> <p>Other comments on this policy: 1 The ‘Site Details’ section refers to the current use of the site as Industrial. However, the planning permission has been implemented and is partly in residential use. The policy should therefore also note that the current use of the site is therefore partly in residential use. 2 The ‘Planning Status’ section should be updated to note that Hybrid rather than Outline Planning Permission has been secured, construction has commenced, and Plot 2 is completed and occupied. 3 The policy should clearly state that the Hybrid Planning Permission provides the approved masterplan for this site allocation. 4 Due to the applications that are coming forward it should be noted that the total non-residential floorspace for the site is up to 10,840 sqm (including currently proposed alterations that are coming forward). 5 The remaining Plots will be delivered between 2021-2026. 6 Paragraph 15.24 is incomplete and needs to be completed with reference to the Reserved Matters approval for Plot 4 and Plot 6. 7 Paragraph 15.27 states that ‘development must be in accordance with a masterplan to ensure coordination of uses across the site’. It should be noted that the Hybrid Planning Permission secured the masterplan for this site and therefore this should be referred to.</p>	<p>Support is noted. Agree that the site be called Deptford Landings (previously known as Oxestalls Road). Disagree that the site allocation should be removed from the Local Plan as it will be delivered in phases over the Plan period and forms one of the most important strategic development sites in the borough. Agree with the other comments that seek updates to the text to align with the current position.</p>	<p>Local Plan amended by changing the name of the site allocation to Deptford Landings and to provide updates regarding the site’s planning, masterplan and delivery status.</p>
SEGRO	-	General	Conclusion	Comments noted.	No change.

(CBRE Limited obo)	3	LNA SA 04	We believe there will be sustainable solutions to addressing these comments and welcome the opportunity to discuss these matters with you. We trust that these representations are clear and would be grateful if you could confirm receipt. If there is any queries or point of clarification, please contact me		
SEGRO (CBRE Limited obo)	3	LNA SA 04	With regards to Evelyn Court specifically, we note that the Lewisham Employment Land Study 2019 recommends that this site is not released for housing and continues to be protected for industrial capacity. The allocation of this site for residential uses is therefore not justified.	The site has an extant prior approval for conversion of office to residential. It is therefore deemed that the SIL is compromised and that a site allocation that supports co-location of uses can help bring about a high quality, mixed use development that will be preferable to a prior approval scheme.	No change.
Vision Develop (Q Square obo)	3	General LNA SA 04	<p>Draft Lewisham Local Plan – Regulation 18 Stage Representations on behalf of Vision Develop</p> <p>We write to you on behalf of Vision Develop in respect of the Regulation 18 Stage of the Draft Lewisham Local Plan. Vision Develop specifically has an interest in land identified as Site Allocation 4 (Evelyn Court), within the Lewisham North Area. They are working collaboratively with Lewisham Homes, who also have an interest in the Site, to deliver a masterplan scheme across the Site Allocation.</p> <p>Comments specifically relating to this Draft Site Allocation are provided and some further comments in relation to specific planning policies are also included. In general, Vision Develop support the emergence of the new Local Plan and support the Council in progressing the document towards adoption.</p>	Support noted. Responses to further detailed representations set out elsewhere in this Consultation Statement.	No change.
Vision Develop (Q Square obo)	3	LNA SA 04	<p>Site Allocation 4 – Evelyn Court at Surrey Canal Road Strategic Industrial Location</p> <p>Vision Develop support the release of the site for co-location development, including employment and residential uses. However, our comments relate to some of the specific wording within the draft designation, including:</p> <ul style="list-style-type: none"> We are supportive of the proposed removal of the Site from the Surrey Canal Strategic Industrial Land (SIL) designation, as identified on the Draft Local Plan “Proposed Changes to the adopted Policies Map”; On the basis that the Site is proposed to be removed from the Surrey Canal SIL designation, we consider that the title of the draft Site Allocation should remove reference to the current SIL designation; In terms of the indicative capacity from a residential units perspective, we consider that this should be a range which better reflects the development potential of the site (i.e. from 80 to 130 new homes). We have been undertaking pre-application discussions with the Council which have informed this range; The draft Site Allocation also states that the redevelopment of the site should be ‘employment led’. We consider that it should be clarified that the redevelopment should be employment led from “...a design perspective...” to ensure that any proposal reflects this; 	<p>Is this a landowner? Support noted. Agree that the site title and policy reference needs amending.</p> <p>The council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper</p> <p>Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including that it has been re-designated from SIL to LSIS, taking account of the</p>	<p>Name of site allocation amended to remove SIL and to refer instead to LSIS.</p> <p>Evelyn Court LSIS site allocation amended to refer to LSIS policy and tall buildings. Site capacity amended with residential increased to 102 units and employment floorspace increased to 2,381m².</p>

			<ul style="list-style-type: none"> We consider that reference to the potential for a taller or tall building could be included within the draft Site Allocation. This is on the basis that the Site is within the context of taller buildings at the adjacent Timberyard site. In addition, Figure 5.1 of the Draft Local Plan indicates that the Site is within a ‘more suitable’ location for a tall / taller building and Figure 5.2 indicates that it is within a ‘less sensitive’ location for a tall / taller building. The Site is also not within any strategic or local views. In this context, we consider that the wording of the draft Site Allocation could be updated to indicate this potential; Under the ‘Development Requirements’ section of the draft Site Allocation, there is cross reference to Draft Policy EC2. However, we consider that, with the de-designation of the Site from SIL, that the reference should instead be made to draft Policy EC7. 	<p>existing character of the area and pre-application discussions for this site.</p> <p>-Based on these considerations, the land use mix and residential units have been amended.</p> <p>Disagree that the words “a design perspective” should be included as optimal capacity for the site will be established at planning application stage through a design led approach.</p> <p>Agree that tall buildings should be referenced and that the site allocation should refer to the LSIS policy, not SIL policy.</p>	
Tribe Student Housing (Avison Young obo)	- 3	General LNA SA 06	<p>Representation on Lewisham Local Plan: Main Issues and Preferred Approaches and Proposed Changes to the Adopted Policies Map (Regulation 18 Consultation).</p> <p>We write on behalf of our client, Tribe Student Housing Ltd, to submit a representation to the London Borough of Lewisham (LBL) in response to the following consultation documents:</p> <ul style="list-style-type: none"> Local Plan: Main Issues and Preferred Approaches; and Proposed Changes to the Adopted Policies Map. <p>The consultation period on both of these documents closes on 11th April 2021. This letter contains an overview of the Site being promoted by Tribe Student Housing Ltd before making representations on the Local Plan and Proposed Changes to the Adopted Policies Map in relation to the proposed site allocation.</p>	Comments noted.	No change.
Tribe Student Housing (Avison Young obo)	- 3	General LNA SA 06	<p>Site Context and Background</p> <p>The Site is located at 164-196 Trundley’s Road and 1-9 Sanford Street, Deptford SE8 5JE. The site lies southwest of Deptford Park, adjacent to Folkestone Gardens and extends to approximately 0.38ha. The site is bound by Trundley’s Road to the east, Sanford Street to the south, railway lines and a TfL operations building (substation) to the west and Juno Way to the north. The site benefits from a long frontage to Folkestone Gardens.</p> <p>A planning application was submitted for the Site in August 2020 and is pending determined by LBL (ref 20/117866) for the following description of development: <i>“Demolition of existing buildings and redevelopment of the site for two new buildings comprising flexible commercial floorspace (Use Class B1c/B2/B8) at ground and mezzanine floors and residential units (Use Class C3) and purpose-built student accommodation bedspaces (Use Class Sui Generis) above, with associated access and highway works, amenity areas, cycle, car parking and</i></p>	The supplementary information is noted.	No change.

			<p><i>refuse/recycling stores at 164-196 Trundleys Road and 1-9 Sanford Street, SE8 5JE.”</i></p> <p>The determination of this application has been delayed until the LBL regulation 18 draft Local Plan is published. Within the adopted LBL Local Plan, the Site falls within the wider Surrey Canal Strategic Industrial Location (SIL) which protects industrial uses. However, it was confirmed by LBL that the Site would be allocated for co-location of commercial and residential uses in the emerging Local Plan, rendering the development proposals acceptable in principle. This is now reflected in the draft Local Plan (as discussed in this letter) as the site is allocated for comprehensive employment-led redevelopment and co-location of compatible commercial, residential and complementary main town centre uses and de-designated from SIL.</p> <p>The planning application includes conventional residential as well as Purpose-Built Student Accommodation (PBSA). The Site is located within proximity of surrounding Higher Education Institutions and there is an increasing need for PBSA in the Borough and in London generally. In particular, the site is well located to serve Goldsmiths College, University of London, Trinity Laban Conservatoire of Music and Dance and Ravensbourne University London.</p> <p>The redevelopment of this site for employment-led mixed-use development will generate a number of key public benefits:</p> <ul style="list-style-type: none">• Redevelopment of an underused brownfield site (in line with the NPPF);• An increase in industrial capacity through the provision of new high quality flexible industrial floorspace;• Provision of conventional residential units, including affordable housing, contributing towards borough and London-wide housing targets;• New student bedspaces, contributing to a local and national need for student accommodation and freeing-up the conventional housing stock for local people;• Creation of new jobs associated with the commercial floorspace, plus additional jobs during the construction phase of the development and within the wider economy;• Improvements to the public realm and pedestrian environment near Folkestone Gardens;• A sustainable scheme including connection to SELCHP; and• CIL and s106 contributions towards local infrastructure improvements.		
Tribe Student Housing (Avison Young obo)	- 3	General LNA SA 06	<p>We understand that the comments received as part of this consultation will inform the ‘Proposed Submission’ version of the Local Plan, which will be published for public consultation (Regulation 19 stage). We look forward to continued engagement with the Council through the Local Plan preparation process.</p> <p>We look forward to confirmation of receipt of these representations at the earliest opportunity. If you have any queries, please do not hesitate to contact us.</p>	Comments noted.	No change.

Trundley's Road Ltd (Avison Young obo)	- 3	General LNA SA 06	<p>Representation on Lewisham Local Plan: Main Issues and Preferred Approaches and Proposed Changes to the Adopted Policies Map (Regulation 18 Consultation)</p> <p>We write on behalf of our client, Trundley's Road Ltd, to submit a representation to the London Borough of Lewisham (LBL) in response to the following consultation documents:</p> <ul style="list-style-type: none">• Local Plan: Main Issues and Preferred Approaches; and• Proposed Changes to the Adopted Policies Map. <p>The consultation period on both of these documents closes on 11th April 2021. This letter contains an overview of the Site being promoted by Trundley's Road Ltd before making representations on the Local Plan and Proposed Changes to the Adopted Policies Map in relation to the proposed site allocation.</p>	Comments noted.	No change.
Trundley's Road Ltd (Avison Young obo)	- 3	General LNA SA 06	<p>Site Context and Background</p> <p>The Site is located at 164-196 Trundley's Road and 1-9 Sanford Street, Deptford SE8 5JE. The site lies southwest of Deptford Park, adjacent to Folkestone Gardens and extends to approximately 0.38ha. The site is bound by Trundley's Road to the east, Sanford Street to the south, railway lines and a TfL operations building (substation) to the west and Juno Way to the north. The site benefits from a long frontage to Folkestone Gardens.</p> <p>A planning application was submitted for the Site in May 2018 on behalf of Trundley's Road Ltd and is pending determined by LBL (ref DC/18/106941) for the following description of development:</p> <p><i>“Demolition of the existing buildings and construction of a basement, double height commercial plinth at ground floor and two buildings, one of part 6, part 9 storeys and one of part 11, part 15 storeys to provide 2,220 sqm (GIA) of flexible commercial space (use classes B1c/B2/B8) at ground and mezzanine floors with 189 residential dwellings above, together with provision of associated access and highway works, amenity areas, cycle, disabled and commercial car parking (within the basement), and refuse/recycling stores.”</i></p> <p>The determination of this application has been delayed until the LBL regulation 18 draft Local Plan is published. At the time of submission, the Site fell within the wider Surrey Canal Strategic Industrial Location (SIL) which protects industrial uses. However, it was confirmed by LBL that the Site would be allocated for co-location of commercial and residential uses in the emerging Local Plan, rendering the development proposals acceptable in principle. This is now reflected in the draft Local Plan (as discussed in this letter) as the site is allocated for comprehensive employment-led redevelopment and co-location of compatible commercial, residential and complementary main town centre uses and de-designated from SIL.</p> <p>The redevelopment of this site for employment-led mixed-use development will generate a number of key public benefits:</p> <ul style="list-style-type: none">• Redevelopment of an underused brownfield site (in line with the NPPF);	The supplementary information is noted.	No change.

			<ul style="list-style-type: none"> • An increase in industrial capacity through the provision of new high quality flexible industrial floorspace; • Provision of conventional residential units, including affordable housing, contributing towards borough and London-wide housing targets; • The creation of new jobs associated with the commercial floorspace, plus additional jobs during the construction phase of the development and within the wider economy; • Improvements to the public realm and pedestrian environment near Folkestone Gardens; • A sustainable scheme including connection to SELCHP; and • CIL and s106 contributions towards local infrastructure improvements. 		
Trundley's Road Ltd (Avison Young obo)	- 3	General LNA SA 06	<p>We understand that the comments received as part of this consultation will inform the 'Proposed Submission' version of the Local Plan, which will be published for public consultation (Regulation 19 stage). We look forward to continued engagement with the Council through the Local Plan preparation process.</p> <p>We look forward to confirmation of receipt of these representations at the earliest opportunity. If you have any queries, please do not hesitate to contact us.</p>	Comments noted.	No change.
	3	General LNA SA 06	<p>I write with regard to the site 164-196 Trundleys Road and 1-9 Sanford Street, Deptford SE8 5JE which I am the landowner to submit a representation to the London Borough of Lewisham (LBL) in response to the following consultation documents:</p> <ul style="list-style-type: none"> - Local Plan: Main Issues and Preferred Approaches; and - Proposed Changes to the Adopted Policies Map <p>This letter contains an overview of the site currently being promoted, which currently has two planning applications pending determination (due to be heard at the Strategic Planning Committee March 23rd 2021) before making representations on the Local Plan and Proposed Changes to the Policies Map in relation to the proposed site allocation.</p>	Comments noted.	No change.
	3	General LNA SA06	<p>I understand that the comments received as part of this consultation will inform the 'Proposed Submission Version' of the Local Plan, which will be published for public consultation (Regulation 19 stage). I look forward to engagement with the Council through the Local Plan preparation process.</p> <p>I look forward to confirmation of receipt of these representations at the earliest opportunity. If you have any queries please do not hesitate to contact myself.</p>	Comments noted.	No change.
Tribe Student Housing (Avison Young obo)	3	LNA SA 06	<p>As above, Trundley's Road is the subject of a draft site allocation (no. 6 – Strategic Industrial Land (SIL) at Surrey Canal Road and Trundley's Road). This draft allocation is for "Comprehensive employment-led redevelopment. Co-location of compatible commercial, residential and complementary main town centre uses". The draft site allocation sets out the following: <i>"The site is situated within the Surrey Canal Road Strategic Industrial Location, on the south side of Surrey Canal Road and adjacent to Folkestone Gardens. The site functions in isolation of the remaining SIL land by virtue of a railway line that creates a physical barrier at the western edge. It is occupied by a mix of industrial</i> </p>	Co-location is generally not appropriate within SIL. However, the Employment Land Study identifies this site as appropriate for co-location. Therefore de-designation of the SIL is being sought so as to help with the delivery of	Surrey Canal Road and Trundleys Road site allocation amended by de-designating SIL and re-designating as LSIS, where co-location is allowed. A new site allocation has been added for Bermondsey

			<p><i>units and associated yard space, a scrap yard, and a small terrace of retail and residential uses at the southernmost end along Trundley’s Road. Redevelopment and site intensification, along with the co-location of commercial and other uses, will deliver high quality workspace that forms part of a new employment-led mixed use quarter, together with the Apollo Business Centre SIL and Neptune Wharf MEL sites. Replacement provision of SIL land will be made at the Bermondsey Dive Under site. Development will also enable public realm enhancements to improve the walking and cycle environment as well as the amenity of Folkestone Gardens and neighbouring residential areas.”</i></p> <p>Overall, the client is supportive of the de-designation of the Trundley’s Road site from SIL. However, in the first instance, we maintain our position that a mixed-use development including residential use could come forward on the site even without the de-designation from SIL. This is on the basis that the site is not a typical SIL site in terms of its existing land uses, location and context. Firstly, the site is currently occupied by a range of uses, including a row of vacant terraced shops with residential accommodation above. Moreover, this part of the SIL designation has been identified to be amongst the poorest quality in terms of environment and functionality. Therefore, the principle of mixed-use development including residential on the site should be considered acceptable given the site’s current characteristics.</p> <p>Notwithstanding this, the client is supportive of the draft site allocation and overall approach to industrial land, including the designation of compensatory SIL land at the Bermondsey Dive Under.</p>	employment-led mixed uses on this site. To compensate Bermondsey Dive Under will be designated as SIL.	Dive Under, designated as both SIL and LSIS.
Tribe Student Housing (Avison Young obo)	3	LNA SA 06	There are multiple ownerships within site allocation no. 6. As such, it is likely that development on the site will come forward in phases. Therefore, we consider the site allocation should explicitly acknowledge that individual sites within the allocation can come forward within their ownership restrictions, provided that they have the necessary regard to potential future development on adjacent sites.	Noted. Policy DM3 already deals with multiple ownerships and phasing of sites.	Surrey Canal Road and Trundleys Road site allocation amended by referring to partnership working, phasing and policy DM3.
Tribe Student Housing (Avison Young obo)	3	LNA SA 06	In summary, we are supportive of the draft site allocation no. 6 and aspiration for the Trundley’s Road site to deliver a comprehensive employment-led redevelopment and co-location of compatible commercial, residential and complementary town centre uses. However, as set out in this representation, we consider a number of amendments could be made to ensure that the development capacity of the site is optimised and a suitable mix of uses is sought in order to enhance and deliver growth in this key location whilst helping the borough meet its housing targets.	Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the de-designation from SIL and the introduction of co-location on this site. Based on these considerations, the capacities have been amended to reflect planning consent granted for the site and the pre-application for the remainder of the site. Optimal capacity for the Juno Way part of the site	Surrey Canal Road and Trundleys Road site allocation capacities amended to increase residential to 274 (using ratio of 2.5:1 for PBSA) and increase employment to 2,890m ² .

				will be established at planning application stage through a design led approach.	
Trundley's Road Ltd (Avison Young obo)	3	LNA SA 06	<p>As above, Trundley's Road is the subject of a draft site allocation (no. 6 – Strategic Industrial Land (SIL) at Surrey Canal Road and Trundley's Road). This draft allocation is for “Comprehensive employment-led redevelopment. Co-location of compatible commercial, residential and complementary main town centre uses”. The draft site allocation sets out the following:</p> <p><i>“The site is situated within the Surrey Canal Road Strategic Industrial Location, on the south side of Surrey Canal Road and adjacent to Folkestone Gardens. The site functions in isolation of the remaining SIL land by virtue of a railway line that creates a physical barrier at the western edge. It is occupied by a mix of industrial units and associated yard space, a scrap yard, and a small terrace of retail and residential uses at the southernmost end along Trundley's Road. Redevelopment and site intensification, along with the co-location of commercial and other uses, will deliver high quality workspace that forms part of a new employment-led mixed use quarter, together with the Apollo Business Centre SIL and Neptune Wharf MEL sites. Replacement provision of SIL land will be made at the Bermondsey Dive Under site. Development will also enable public realm enhancements to improve the walking and cycle environment as well as the amenity of Folkestone Gardens and neighbouring residential areas.”</i></p> <p>Overall, the client is supportive of the de-designation of the Trundley's Road site from SIL. However, in the first instance, we maintain our position that a mixed-use development including residential use could come forward on the site even without the de-designation from SIL. This is on the basis that the site is not a typical SIL site in terms of its existing land uses, location and context. Firstly, the site is currently occupied by a range of uses, including a row of vacant terraced shops with residential accommodation above. Moreover, this part of the SIL designation has been identified to be amongst the poorest quality in terms of environment and functionality. Therefore, the principle of mixed-use development including residential on the site should be considered acceptable given the site's current characteristics.</p> <p>Notwithstanding this, the client is supportive of the draft site allocation and overall approach to industrial land, including the designation of compensatory SIL land at the Bermondsey Dive Under.</p>	Disagree. Co-location is generally not appropriate within SIL. However, the Employment Land Study identifies this site as appropriate for co-location. Therefore de-designation of the SIL is being sought so as to help with the delivery of employment-led mixed uses on this site. To compensate Bermondsey Dive Under will be designated as SIL.	Surrey Canal Road and Trundleys Road site allocation amended by de-designating SIL and re-designating as LSIS, where co-location is allowed. A new site allocation has been added for Bermondsey Dive Under, designated as both SIL and LSIS.
Trundley's Road Ltd (Avison Young obo)	3	LNA SA 06	The draft site allocation is for comprehensive employment-led redevelopment. Co-location of compatible commercial, residential and complementary main town centre uses. We consider there should be greater flexibility in the site allocation to reflect the suitability of other uses on the site, including PBSA. The site is a good location for student accommodation due to the proximity and accessibility of the site to higher education institutions such as Goldsmiths College and the University of London. The provision of PBSA on the site would free-up conventional housing stock for local people whilst contributing towards London-wide targets for PBSA bedspaces and overall housing need in the borough. There is an unmet demand for student accommodation which is expected to increase due to COVID-19 and therefore the provision of PBSA will become more important in order to protect the existing conventional housing stock in the borough for family accommodation. We therefore consider the draft	Agree that the site is a suitable location for purpose built student accommodation.	Surrey Canal Road and Trundleys Road site allocation amended to make reference to purpose built student accommodation and to reflect planning consent granted for the site.

			site allocation should be amended to include PBSA as an acceptable use on the site.		
Trundley's Road Ltd (Avison Young obo)	3	LNA SA 06	There are multiple ownerships within site allocation no. 6. As such, it is likely that development on the site will come forward in phases. Therefore, we consider the site allocation should explicitly acknowledge that individual sites within the allocation can come forward within their ownership restrictions, provided that they have the necessary regard to potential future development on adjacent sites.	Noted. Policy DM3 already deals with multiple ownerships and phasing of sites.	Surrey Canal Road and Trundleys Road site allocation amended by referring to partnership working, phasing and policy DM3.
Trundley's Road Ltd (Avison Young obo)	3	LNA SA 06	In summary, we are supportive of the draft site allocation no. 6 and aspiration for the Trundley's Road site to deliver a comprehensive employment-led redevelopment and co-location of compatible commercial, residential and complementary town centre uses. However, as set out in this representation, we consider a number of amendments could be made to ensure that the development capacity of the site is optimised and a suitable mix of uses is sought in order to enhance and deliver growth in this key location whilst helping the borough meet its housing targets.	Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the de-designation from SIL and the introduction of co-location on this site. Based on these considerations, the capacities have been amended to reflect planning consent granted for the site and the pre-application for the remainder of the site. Optimal capacity for the Juno Way part of the site will be established at planning application stage through a design led approach.	Surrey Canal Road and Trundleys Road site allocation capacities amended to increase residential to 274 (using ratio of 2.5:1 for PBSA) and increase employment to 2,890m ² .
	3	LNA SA06	<p>As above, Trundley's Road is the subject of a draft site allocation (no. 6 Strategic Industrial Land (SIL) at Surrey Canal Road and Trundely's Road). The draft allocation is for "Comprehensive employment-led development. Co-location of compatible commercial, residential and complementary main town centre uses". The draft site allocation sets out the following:</p> <p><i>The site is situated within the Surrey Canal Road Strategic Industrial Location, on the south side of Surrey Canal Road and adjacent to Folkestone Gardens. The site functions in isolation of the remaining SIL land by virtue of a railway line that creates a physical barrier at the western edge. It is occupied by a mix of industrial units and associated yard space, a scrap yard, and a small terrace of retail and residential uses at the southernmost end along Trundleys Road. Redevelopment and site intensification, along with the co-location of commercial and other uses, will deliver high quality workspace that forms part of a new employment-led mixed use quarter, together with the Apollo Business Centre SIL and Neptune Wharf MEL sites. Replacement provision of SIL land will be made at the Bermondsey Dive Under site. Development will also enable public realm enhancements to improve the walking and cycle environment as well as the amenity of Folkestone Gardens and neighbouring residential areas.</i></p>	<p>Comments are noted. Mixed use development is deemed acceptable on this co-location site.</p> <p>Support for de-designation of SIL and re-designation as LSIS at Trundleys Road is noted.</p> <p>Support for compensatory SIL at Bermondsey Dive Under is noted.</p>	Site allocation has been amended to state: co-location of compatible commercial, residential and purpose built student accommodation – to reflect the granted permission for the site.

			<p>Overall I am supporting of the de-designation of the Trundley’s Road site from SIL. However in the first instance I maintain the position that a mixed-use development including residential could come forward on the site even without the de-designation from SIL. This is on the basis that the site is not a typical SIL site in terms of its existing land uses, location and context. Firstly, the site is currently occupied by a range of uses, including a row of vacant terraced shops with residential accommodation above. Moreover, this part of the SIL designation has been identified to be amongst the poorest quality in terms of environment and functionality. Therefore the principle of mixed-use development including residential on the site should be considered acceptable given the site’s current characteristics.</p> <p>Notwithstanding this, I am supportive of the draft site allocation and overall approach to industrial land, including the designation of compensatory SIL at Bermondsey Dive Under.</p> <p>The draft site allocation is for comprehensive employment-led redevelopment. Co-location of compatible commercial, residential and complementary main town centre uses. I consider there should...[The remaining text to this representation could not be located at the time this document was published]</p>		
Millwall Football Club (CBRE Ltd obo)	- 3	General LNA SA 08	<p>LEWISHAM LOCAL PLAN - REGULATION 18 STAGE “MAIN ISSUES AND PREFERRED APPROACHES” (JAN 2021)</p> <p>CBRE is appointed by Millwall Football Club (‘MFC’), in respect of their land interest which falls within the adopted Surrey Canal Triangle Mixed-use Employment Location, to submit representations to the Lewisham Local Plan - Regulation 18 stage “Main Issues and Preferred Approaches” (Jan 2021) – hereafter ‘the Draft Plan.’</p> <p>We appreciate that the Draft Plan is at a relatively early stage in respect of the formulation of detailed policy requirements for individual site allocations. We trust that the comments set out in this response will be taken into consideration as the detail of the site allocation evolves, and we look forward to working with Officers to achieve this.</p> <p>At this stage of the plan-making process we have not provided a detailed response on the individual Development Management policies within the Draft Plan but reserve the right to comment on these as they are further refined at the Regulation 19 stage.</p>	Support and comments noted.	No change.
Millwall Football Club (CBRE Ltd obo)	- 3	General LNA SA 08	As stated above, the principal response from MFC is one of support for the Draft Plan insofar as assisting in providing guidance and direction on a complex regeneration project. The overriding theme of the comments below is to ensure that the development potential of the site is maximised whilst ensuring that this does not compromise the ability for MFC to continue to operate at the site.	Comments noted.	No change.
Millwall Football Club (CBRE Ltd obo)	- 3	General LNA SA 08	We trust that the comments set out in this response are useful for evolving the detail of the site allocation. We would be grateful if you could confirm receipt of these representations and, as a major stakeholder within the Draft Plan area, would welcome further discussion with you to address the comments raised in these representations ahead of the next iteration of the Draft Plan.	Comments noted.	No change.

Millwall Football Club (CBRE Ltd obo)	- 3	General LNA SA 08	Background to MFC MFC currently competes in The Championship, the second tier of English football. MFC has a long and established history, set up in 1885. From 1910 until 1993 MFC played at what is now known as ‘The Old Den’ in New Cross, before moving to its current home stadium, ‘The Den’, in South Bermondsey. Since their move to The Den over 25 years ago, MFC has played most of their competitive football between The Championship and League 1. The last few seasons have brought continued success for MFC, securing promotion to the Championship in 2016/17 and finishing just outside of the playoffs in two of the last three seasons. MFC’s aspirations on the pitch are met with aspirations off the pitch with plans to expand, enhance and improve the existing stadium. At the time of writing, MFC is sitting in 10th place in the Championship and once again is pushing for promotion to the Premier League. In its current condition, The Den would not meet the requirements set by the Premier League Regulators and in this sense the aspiration of MFC on the pitch could be potentially stunted due to the current stadium infrastructure. To ensure that MFC remains competitive it is essential that it is able to expand and improve facilities to meet its growth potential and ambitions. Beyond the stadium itself, MFC has a long-established presence in the area and with the community, and strongly supports the principle of regeneration where this supports the needs of the football club and the local community.	The supplementary information is noted.	No change.
The Renewal Group (Carney Sweeney obo)	- 3	General LNA SA 08	Representations on behalf of The Renewal Group We act on behalf of The Renewal Group who are the developers of the New Bermondsey site (part of the Surrey Canal Triangle site) in the northern part of the London Borough of Lewisham. The representations below are made having regard to the development of this site.	Comments noted.	No change.
The Renewal Group (Carney Sweeney obo)	- 3	General LNA SA 08	We are very happy to liaise with you further in relation to the above representations as part of the evolution of the Local Plan.	Comments noted.	No change.
Millwall Football Club (CBRE Ltd obo)	3 3	LNA SA 08 Paras 15.54 and 15.55	Principal Comments on the Draft Plan (1) Importance of Enabling Development Bullet Point 2 of Paragraph 15.55 states ‘ <i>development must capitalise on the opportunities presented by Millwall FC Stadium, including options for its re-provision and expansion, helping to secure the long-term future of the football club in the Borough</i> ’. Whilst we fully support this principle, further clarity is required in the Draft Plan policy to guide how this will be achieved. For the avoidance of doubt, ‘in the Borough’ needs to be replaced with ‘on this site’, to avoid any ambiguity as to the location of the Club. A key part of the viable future for MFC is its ability to use its site to help drive additional income and revenue to support the required upgrades needed to the stadium. It thus is a fundamental aspect of the deliverability of the allocation (in terms of realising the long term future of the MFC) to ensure that as part of any stadium-led redevelopment MFC is able to also promote other uses (such as	Support is noted. Agree that the future location of the club should be clarified. The Local Plan already provides indicative site capacities that does not artificially constrain development. Optimal capacity for the site will be established at planning application stage through a design led approach. Disagree that Opportunities should	Surrey Canal Triangle site allocation amended by replacing “in the borough” with “on this site”.

		<p>residential and commercial) that act as <i>‘enabling development’</i>. At present, the Draft Plan (and the site-specific SPD) provide no indication of how the indicative housing figure of 3,600 would be distributed across the allocation.</p> <p>The principle of ‘enabling development’ is common in developments such as this, particularly for football teams outside of the top tier of English football. The GLA Stage II report¹ into the expansion of the Brentford Football Stadium refers to enabling development no fewer than 29 times, with the Stage II Report summarising <i>‘the fact remains that the quantum and nature of the enabling housing development is required in the form proposed in order to create the level of revenue required to subsidise the cost of the stadium’</i>.</p> <p>Left unaddressed (i.e. if the Draft Plan remains silent on the distribution of housing across the allocation), the potential consequence is that the available capacity for other uses on the site (i.e. residential, commercial) is absorbed within the wider allocation, on land outside the control (and benefit) of MFC. This in turn introduces a risk of diluting MFC’s ability to pursue its own enabling development works to subsidise and release the capital required to deliver the stadium works. MFC requires enabling development to fund the proposed works. A key requirement of the allocation is to support the long-term future of the Club, and it is therefore essential for the Draft Plan to expressly deal with the distribution of housing (and other uses) across the allocation, to provide for the enabling development. If development is not appropriately distributed across the landownerships in the allocation the required improvements to the stadium, itself a key centre piece of the wider regeneration, will not materialise.</p> <p>It is likely that the ambitions for the whole site will be secured by two or more schemes, so the distribution of land use and quantum needs to be considered carefully. Fundamentally, the residential quantum should be seen as indicative so as to not artificially constrain development across the whole site.</p> <p>In addition to being a benefit to MFC this is also required to provide clarity to other landowners within the allocation. The clarity provided through this revision will also be of benefit to Lewisham in assessing applications that come forward on the site and be consistent with Paragraph 16d of the NPPF (2019) which states: <i>‘plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.’</i></p> <p>The need for enabling development is inferred in Paragraph 15.54 in which it is stated <i>‘with the creation of a new high-quality mixed-use quarter and leisure destination that will help to secure a viable future for Millwall FC within the Borough.’</i> However, a much more direct reference is required in the site allocation policy to ensure that the development capacity in the allocation can be utilised, at least in part, on the land interests held by MFC.</p> <p>We look forward to working with Officers to agree the exact wording to capture this but suggest that as a minimum, the text included below would represent an appropriate starting point. <i>15.54: Comprehensive redevelopment of the site is integral to supporting regeneration in the area, with the creation of a new high-quality mixed-use</i></p>	<p>specifically mention enabling development.</p> <p>Disagree that the redevelopment of the site should not seek to provide a policy compliant tenure split.</p>	
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Millwall Football Club (CBRE Ltd obo)	3	LNA SA 08	<p>In addition, as a strategic site allocation the need to be clear on the viability position for the policy (through express reference to the need for enabling development) is consistent with the approach taken in the Planning Practice Guidance2:</p> <p><i>Why should strategic sites be assessed for viability in plan making?</i></p> <p><i>It is important to consider the specific circumstances of strategic sites. Plan makers can undertake site specific viability assessment for sites that are critical to delivering the strategic priorities of the plan. This could include, for example, large sites, sites that provide a significant proportion of planned supply, sites that enable or unlock other development sites or sites within priority regeneration areas.</i></p> <p>Initial viability work that has been undertaken to support the proposed works to the site has emphasised the criticality of a required quantum of development to be associated with the MFC proposals if it is to be viable. Ahead of the publication of the Regulation 19 version of the Local Plan we would welcome the opportunity to further test this with Officers so that the wording used in the strategic allocation can be informed by the specific circumstances of this strategic site, consistent with the PPG.</p>	Prior to the Regulation 19 version of the Local Plan the council has met with the landowners to discuss potential development of the site.	No change.
Millwall Football Club (CBRE Ltd obo)	3 3	LNA SA 08 Para 15.55	<p>1) Relationship to the SPD</p> <p>MFC has previously submitted representations to the Surrey Canal Triangle SPD. Bullet Point 1 of Paragraph 15.55 of the Draft Plan states that development ‘<i>must be delivered through a site wide masterplan, in accordance with the Surrey Canal Triangle SPD.</i>’ Whilst we support the principle of the SPD to guide the development proposals on site, it in itself is not a Development Plan document. However, the language used in the Draft Plan (itself a Development Plan document) elevates the level of conformity expected in the SPD with it stated that the masterplan must be delivered in accordance with the SPD.</p> <p>The Planning Practice Guidance (PPG) is clear on the relationship between SPDs and Local Plans. As stated: <i>‘Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not</i></p>	Agree that clarity is needed in relation to the SPD.	Surrey Canal Road MEL site allocation amended by referring to proposals having regard to the overarching vision and development principles set out in the SPD, instead of stating they must be in accordance with it.

			<p><i>form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.'</i></p> <p>Additional flexibility should be introduced in the text to state that the relationship between the Development Plan policy and SPD guidance is clear. The policy can refer to the need for any proposals to have regard to the principles/ overarching vision of the SPD but should stop short of requiring that they 'must be' in accordance with it.</p>		
Millwall Football Club (CBRE Ltd obo)	3 3	LNA SA 08 Para 15.56	<p>(3) Club's Future</p> <p>We welcome reference within the site allocation that <i>'the layout of the site should ensure that Millwall FC Stadium can continue to function as a large spectator destination on a long-term basis. This includes appropriate arrangements for access, servicing and evacuation'</i>. We suggest that in the next iteration of the Draft Plan that this is expanded upon to provide further context on this point.</p> <p>The ability for MFC to operate safely and securely is paramount. The need for safe operations at the stadium has been heightened following proactive and conscious efforts recently to reduce terrorism risk associated with large spectator events. In addition, the current Covid-19 pandemic has further heightened the need for additional measures to be introduced in order to ensure the safe operations of football stadiums. Both of these components are integral parts for how development is progressed at New Bermondsey. It will be essential that forthcoming applications in the site allocation are considered in respect of these issues to ensure that MFC can continue to function as a large spectator destination on a long-term basis. The nuances of planning development around a football stadium are unique and not typically captured in more general planning policies or development management policies; this highlights the need for the site allocation to be clear on the operational needs of MFC from the outset to ensure that development is brought forward in a manner that preserves the key objective to ensure that MFC can continue to function as a large spectator sport on a long term-basis.</p> <p>As drafted the policy could be misinterpreted as simply requiring the current functions in respect of access, servicing and evacuation to be maintained on a longer-term basis. In reality the policy needs to address (if it is to deliver upon its objective) the need for appropriate land/routes to be safeguarded to ensure that the longer-term expansion and improvements to The Den are not precluded or prejudiced in any way. This primarily centres around ensuring that the stadium has the ability to become 'Premier League Compliant' (which it is not currently). Given that this is core to policy and its implementation, the policy should include reference in its supporting text to the need to ensure that proposals brought forward in response to the site allocation must not prejudice the ability of any future stadium expansion to be realised.</p> <p>In addition to providing clarity in respect of access, servicing and evacuation, it is important that the policy provides clear direction as to what will be considered through the development management process. Whilst tall buildings are</p>	Agree that that the longer-term expansion of the stadium should not be prejudiced and that construction and delivery on the site should assume the ongoing, continuous operation of the football club. No need to reference excessive shadowing and/or the wind tunnelling effects of tall buildings, as these will be assessed as part of planning applications.	Surrey Canal Road MEL site allocation amended by ensuring development must not prejudice the ability the f stadium to expand and to allow for the ongoing operation of the stadium during construction of the surrounding land.

			<p>supported in principle on site (see ‘Development Quantum’ below) at the application stage evidence should be provided to demonstrate that excessive shadowing and/or the wind tunnelling effects of tall buildings will not affect the operation of the football stadium/ football pitch. These are items that are not expressly covered in the adopted SPD and warrant inclusion in the site allocation given their strategic importance to how development on the site is progressed.</p> <p>It should also be written into the policy that the approach to the construction and delivery on the site should assume the ongoing, continuous operation of MFC at The Den with no requirement for them to relocate during the works. This is currently missing from the wording of the site allocation.</p>		
Millwall Football Club (CBRE Ltd obo)	3 2	LNA SA 08 Paras 15.53 and 15.55	<p>(4) Consistency of Proposals</p> <p>The future Draft Plan should be clear on what is anticipated for the stadium. At Paragraph 15.55 the expansion of the stadium is appropriately noted, whereas 15.53 simply refers to ‘<i>retention or re-provision of the football stadium.</i>’ The site allocation should be clear that its aspiration is for the retention, enhancement and expansion of the football stadium in this location.</p>	Agree that the site allocation should refer to retention, enhancement and expansion of the football stadium.	Surrey Canal Triangle MEL site allocation amended by referring to retention, enhancement and expansion of the stadium.
Millwall Football Club (CBRE Ltd obo)	3 3 2 2	LNA SA 08 Para 15.56 QD 04 QD 06	<p>(5) Development Quantum</p> <p>We support the inclusion in the site allocation that the proposed development quantum is indicative. This ensures consistency with draft policy DQD6 Optimising Site Capacity. We would, however, suggest that the text is amended as it relates to tall buildings. Whilst we agree that it is for the design-led process to inform the location of taller buildings on the site, the principle of tall buildings as a component of how the allocation is to be delivered must be acknowledged.</p> <p>Strategic Site Allocation 3 within the adopted Core Strategy (2011) provides for a strategic scale development that suggests the principle of tall buildings is acceptable in this location. Core Strategy Policy 18 identifies the location and design of tall buildings, and states (inter alia) that these may be appropriate in specific locations identified by the Lewisham Tall Buildings Study, and these locations include Surrey Canal Triangle. The principle of tall buildings is established within the adopted site-specific SPD (2020) which states on Page 52 that ‘<i>given its location within a Regeneration and Growth Area tall buildings are suitable within the SPD Area</i>’. The principle of height is also established through Renewal New Bermondsey Two Limited’s consent.</p> <p>In December 2020, the Secretary of State issued (further) Directions to the Mayor in respect of the London Plan, which included to strengthen the need for Policy D9 (Tall Buildings) to ensure such developments are only brought forward in appropriate and clearly defined areas, as determined by the boroughs. The Mayor has now adopted the New London Plan (2021), including the requisite amendments, to reflect the principle that boroughs should determine the location of tall buildings (as defined locally), and identify these on maps in Development Plans.</p> <p>At present, Paragraph 15.56 states ‘<i>the potential for tall buildings should be explored through the design-led process, taking into account protected views and vistas, including the panorama of the Bridge over the Serpentine</i>’. For the avoidance of doubt, the site allocation needs to expressly confirm that it is an</p>	Following the Regulation 18 public consultation, additional work has been undertaken on the Lewisham Tall Buildings Study which will inform amendments to the Local Plan.	<p>Local Plan amended to reflect Tall Buildings Study.</p> <p>Surrey Canal Triangle MEL site allocation amended to specifically refer to the site being a suitable location for tall buildings.</p>

			appropriate location for tall buildings, and this is essential in order to achieve the strategic ambitions specific to this location, particularly taking into account the need to accommodate open space provision, stadium expansion, leisure development and so forth. This will help to ensure consistency with the New London Plan policy on tall buildings, and in the interests of ensuring a justified policy and one that is clear (consistent with Paragraph 16d of the NPPF 2019).		
Millwall Football Club (CBRE Ltd obo)	3 3	LNA SA 08 Para 15.55	<p>(6) Infrastructure</p> <p>We suggest that the 3rd from last bullet point of 15.55 is updated to set out that it is expected, as per CIL 122 Tests, that reasonable and proportionate contributions will be made to this infrastructure project. At present the text currently reads <i>‘Provision for the new transport infrastructure, including a new Overground station at Surrey Canal Road and accompanying walking and cycle bridge.’</i> We assume that the text is referring to the fact that the provision of this infrastructure will be made for within the red line of the site allocation as opposed to a requirement for the site allocation to deliver this project (including its funding). This clarification should be provided for in the revised site allocation wording.</p>	<p>PROVIDE CLARIFICATION</p> <p>Agree that the current wording relating to contributions is ambiguous.</p>	Surrey Canal Triangle MEL site allocation amended to clarify the transport infrastructure required on-site and that this is subject to partnership working with other providers.
Millwall Football Club (CBRE Ltd obo)	3 3	LNA SA 08 Para 15.55	<p>(8) Millwall Community Trust</p> <p>The site allocation as drafted is silent on the Millwall Community Trust (MCT). The adopted SPD includes provisions for this use to be retained on site. Given the importance of the MCT to the local area we suggest that the requirement to safeguard this use is included as one of the key development requirements as set out under 15.55. At present the text states <i>‘Development proposals must demonstrate a comprehensive and coordinated approach to supporting healthy communities by integrating new and enhanced publicly accessible sports, leisure and recreation opportunities, including open spaces and community facilities, in line with Policy CI 1 (Safeguarding and securing community infrastructure)’</i>. We suggest that this is expanded to state that the development on site should demonstrably support the longer-term future of the MCT within the allocation. The need to provide for the long term future of the Millwall Community Scheme is included in the existing Core Strategy and should be brought forward into the New Local Plan.</p>	<p>Agree that Millwall Community Scheme should be referenced in the Local Plan.</p>	Surrey Canal Triangle MEL site allocation amended by making reference to the long term future of the Millwall Community Scheme.
The Renewal Group (Carney Sweeney obo)	3	LNA SA 08	<p>Site Allocation 8: Surrey Canal Triangle Mixed Use Employment Location</p> <p>The details in the allocation need to be updated, for example in relation to the following:</p> <ul style="list-style-type: none"> The current use of the site is far more than just a football stadium and industrial uses. The full extent of uses on the New Bermondsey site is provided in Renewal’s recent planning application. A Section 73 application was granted in 2013. Renewal’s planning application is for 3,500 residential units plus a variety of employment floorspace. Development on the Millwall Football Club land and on the Lions Centre would be additional to this. The indicative development capacity figures need to be updated to reflect this. A <i>“clear north-south route linking South Bermondsey Station to Bridgehouse Meadows and the new Overground Station”</i> can only be fully achieved with land beyond the control of Renewal, MFC and the Council. The policy needs to clarify this and not require the developers of the site to provide it in full. 	<p>Where no advanced pre-application has taken place, the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Site Allocations Background Paper.</p> <p>Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the scale of</p>	<p>Surrey Canal Triangle MEL site allocation amended to increase the residential capacity beyond the 3,500 already consented to 4,089 units, (i.e. 589 for LBL land surrounding the stadium), to reduce employment floorspace to 14,253m² and to increase main town centre floorspace to 46,469m².</p> <p>Surrey Canal Triangle MEL site allocation</p>

			Finally, following final changes to the London Plan prior to its eventual adoption and publication, the allocation text needs to be very clear that this is a suitable location for tall buildings.	development resulting from the planning consent granted for the part of the site owned by Renewal and the need to have regard to the development principles set out in the Surrey Canal Triangle SPD. Based on these considerations, the capacity has been amended. Optimal capacity for the site will be established at planning application stage through a design led approach. Agree that Bridgehouse Meadows is located outside of the site. Following the Regulation 18 public consultation, additional work has been undertaken on the Lewisham Tall Buildings Study which will inform amendments to the Local Plan.	amended to reference existing site uses, the Section 73 application and improved connectivity to surrounding areas.
WSP (Sainsbury's Supermarkets Ltd obo)	General LNA SA 09	1. We write on behalf of Sainsbury's Supermarkets Ltd (SSL) in response to the consultation of the new "Lewisham Local Plan: Main Issues and Preferred Approaches", under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. 2. SSL owns the Sainsbury's store and petrol filling station at New Cross Gate, as well as the retail warehousing and associated car parking. SSL objects to the proposed current allocation in the new Local Plan as safeguarded land to accommodate the Bakerloo line Extension (BLE), including a new station. SSL have previously strongly objected to Transport for London's (TfL) consultations on the use of their site for the BLE, including the site's identification as a tunnelling worksite. 3. We have reviewed the Regulation 18 "Lewisham Local Plan: Main Issues and Preferred Approaches" document and evidence base and have set out our comments below.		The objection to this site being safeguarded to accommodate the BLE is noted.	No change.
WSP (Sainsbury's Supermarkets Ltd obo)	LNA SA 09	The Allocation of the Site 4. The SSL site, referred to in the new Local Plan as the 'Former Hatcham Works, New Cross Road', is currently allocated for 912 residential units, 4,560sqm of employment floorspace and 18,240sqm of 'main town centre' floorspace. The		The supplementary information is noted. The routing of the BLE, and the location of stations and required works sites associated with	No change.

		<p>site is also allocated for “<i>new and improved transport infrastructure, including land and facilities required to accommodate the Bakerloo line extension</i>”.</p> <p>5. The identification of the site as the ‘Former Hatcham Works’ site is misleading as it does not reflect the current use of the site. The naming of the site appears to be a deliberate attempt to obfuscate the impact of the allocation on the retail that is fundamental to New Cross/New Cross Gate District Centre. We suggest that the site is renamed to the ‘New Cross Gate Retail Park’ in later versions of the Local Plan. For clarity, we refer to the site as New Cross Gate Retail Park in these representations.</p> <p>6. The proposed BLE has been promoted by TfL since 2017. The proposals have undergone three rounds of consultation. SSL has submitted representations to each of these consultations (dated April 2017, December 2018 and December 2019).</p> <p>7. Based on the published consultation information and supporting evidence, SSL strongly objected to the location of the new BLE station at New Cross Gate Retail Park and the use of the site for tunnel launching and as a works site. This objection still stands.</p> <p>8. SSL is deeply concerned at TfL’s lack of genuine consideration of the concerns raised and the rights of Sainsbury’s as the landowner and long-standing employer and business within the community. SSL has engaged with TfL at each formal consultation opportunity to identify issues and concerns regarding the BLE plans in respect of New Cross Gate Retail Park. Detailed objections have been submitted, supported by extensive technical evidence set out as follows:</p> <ul style="list-style-type: none">▪7A Socio-economic Assessment, prepared by WSP (formerly WSP Indigo) (Appendix A);▪7A Retail Impact Assessment, prepared by WSP (formerly WSP Indigo) (Appendix B);▪7Tunnel engineering advice provided by Dr Sauer and Partners (Appendix C); and▪7A Transport Appraisal prepared by Intermodality (Appendix D). <p>9. In making detailed representations, SSL has previously identified fundamental short, medium and long-term adverse impacts that will affect their site at New Cross Gate and the New Cross/New Cross Gate District Centre and the credibility of the BLE proposals.</p> <p>10. The December 2019 consultation was the first time the location of the New Cross Gate station was explicitly included in the public consultation and TfL acknowledges that the store will have to close as a result of the BLE proposals. In previous public consultations, TfL indicated that the store could continue to trade.</p> <p>11. SSL remains firmly of the view that the previous TfL consultation responses were made based on misleading and incomplete information which failed to fully convey the impact of the new station being located at New Cross Gate Retail Park. It appears that the allocation in the new Local Plan reflects TfL’s preferred</p>	constructing the BLE, have already been through a consultation carried out by TfL and have been safeguarded by Government. This falls outside of the scope of the Local Plan.	
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		<p>strategy and has not considered the impacts of the permanent closure of the Sainsbury’s store on (inter alia) the vitality and viability of New Cross/New Cross Gate District Centre and the socio-economic impacts of the associated job losses.</p> <p>12. The BLE is central to the new Local Plan and its spatial strategy. Therefore, in order for the Local Plan to meet the soundness tests required, the Council needs to be certain on the deliverability of the BLE and the sites TfL has chosen for stations and tunnelling.</p> <p>13. SSL has provided clear evidence which demonstrates, not only that there is no robust business case for the BLE, but that the choice of the New Cross Gate Retail Park for a station and as a tunnelling site will result in adverse impacts on the local community and area.</p>		
WSP (Sainsbury’s Supermarkets Ltd obo)	LNA SA 09	<p>14. In summary, SSL’s concerns are as follows:</p> <ul style="list-style-type: none">▪There is no evidence of a robust and transparent business case for a capital intensive and disruptive infrastructure project such as the BLE. The project should be halted pending the publication of a robust business case;▪Since it is acknowledged that the delivery of a station at New Cross Gate Retail Park will force the closure of Sainsbury’s store, the location of the station at New Cross Gate must be re-consulted upon. Previous consultations assumed that Sainsbury’s could continue to trade;▪The selection of New Cross Gate Retail Park as a station and tunnelling worksite location has not been robustly justified and there has not been proper consideration of alternatives which will have less impact;▪The selection of New Cross Gate Retail Park as a station and tunnelling worksite has many disadvantages which have not been properly considered or articulated. For example, the closure of the Sainsbury’s store will have significant socio-economic consequences for the future of the New Cross/New Cross Gate District Centre which have not been considered;▪TfL has not appropriately and robustly considered the consequential impact upon the regeneration/development potential of New Cross Gate Retail Park to provide over 1,000 new homes and a new Sainsbury’s foodstore, maintaining the continuity of trading during construction and supporting the vitality and viability of New Cross Gate/New Cross District Centre;▪TfL does not appear to have fully considered other potentially viable options for locating New Cross Gate station, closer to the rest of the New Cross/New Cross Gate District Centre, including on the Goodwood Road site;▪TfL does not appear to have seriously considered alternative tunnelling worksites to New Cross Gate Retail Park. For example, the Wearside Road Depot is a more appropriate tunnelling worksite;▪The impact of the tunnelling worksite on a Site of Importance for Nature Conservation (SINC) has not been assessed;	<p>The reasons for objecting to the BLE station and tunnelling works site being located on this site are noted.</p> <p>The routing of the BLE, and the location of stations and required works sites associated with constructing the BLE, have already been through a consultation carried out by TfL and have been safeguarded by Government. This falls outside of the scope of the Local Plan.</p>	No change.

		<p>▪There is no evidence that a Strategic Environmental Assessment (SEA) has been prepared to holistically evaluate the effects of the BLE proposals on the environment and social, cultural and economic circumstances; and</p> <p>▪There is no evidence that TfL has undertaken a robust cost benefit analysis of the BLE proposal, or indeed that there is a robust business case that justifies the significant public expenditure.</p>		
WSP (Sainsbury's Supermarkets Ltd obo)	LNA SA 09	<p>Safeguarding of the Site for the BLE</p> <p>15. Through their ongoing engagement in the consultation process for the proposed BLE, SSL have reiterated their support in principle for the BLE, provided the business case is proven. However, SSL strongly object to their site being identified as a tunnelling worksite by TfL and the site's selection as the location for New Cross Gate Station.</p> <p>16. As explained, the allocation of the New Cross Gate Retail Park to accommodate the BLE will have significant and unacceptable consequences for the existing Sainsbury's store, its employees and the community which it serves. The allocation results in the loss of the regeneration opportunity presented by the site and the loss of any positive impact on the wider New Cross/New Cross Gate District Centre.</p> <p>17. The extent of this lost opportunity is demonstrated by the joint planning application that SSL submitted with London Property Developers, Mount Anvil in 2019. The planning application sought to deliver 1,161 homes on the site across two phases, as well as a replacement supermarket, commercial space, placemaking and infrastructure. The Council validated the planning application on 24 January 2020 (LPA Ref: DC/19/114283). However, the application was subsequently withdrawn on 27 February 2020 due to the ongoing uncertainty around the BLE which has blighted the site.</p> <p>18. Despite this, SSL remains committed to delivering new housing and investment immediately if the allocation for a new station and tunnelling worksite is lifted.</p> <p>19. As a substantial and highly accessible site, with a PTAL rating of 6, New Cross Gate Retail Park offers a valuable regeneration opportunity with excellent potential for contributing to the delivery of much-needed high quality housing. This is recognised in the emerging Local Plan through its allocation for approximately 912 units alongside employment and main town centre uses. SSL is confident that the site could accommodate more housing than the allocation proposes, given its experience elsewhere where densities in excess of 350 units per hectare have been achieved on sites with a lower PTAL than the New Cross Gate Retail Park site. SSL's proposals can deliver significant beneficial development and investment which will be lost should the site be safeguarded for BLE works.</p>	Comments are noted. The routing of the BLE, and the location of stations and required works sites associated with constructing the BLE, have already been through a consultation carried out by TfL and have been safeguarded by Government. This falls outside of the scope of the Local Plan.	No change.
WSP (Sainsbury's Supermarkets Ltd obo)	LNA SA 09	<p>The Lack of a Business Case for the BLE</p> <p>20. SSL is concerned that TfL and Lewisham Council are using the new Local Plan to promote a major capital-intensive and disruptive infrastructure project, when no evidence has been provided to demonstrate a robust and transparent business case. SSL has repeatedly asked for information about overall</p>	Comments are noted. The routing of the BLE, and the location of stations and required works sites associated with constructing the BLE, have	No change.

		<p>development costs, including the costs of land acquisition and the wider socio-economic impacts on the community and New Cross/New Cross Gate District Centre, but TfL remains unwilling to discuss or disclose this. If the site is to be allocated and safeguarded in the new Local Plan, it is incumbent on the Council (with the support of TfL) to address this failing.</p> <p>21. Given that HS2 and Crossrail 1 are both significantly over budget and behind schedule, and Crossrail 2 has been removed as a spending priority for the next decade, it is difficult to understand why TfL continues to press ahead with the BLE without clear evidence of a business case. Indeed, now it is acknowledged that the Sainsbury’s store will be forced to close, the effect this will have on the ‘business case’ should be open to scrutiny.</p> <p>22. As a result of the COVID-19 pandemic over the past 12 months, there has been a dramatic reduction in journeys on the TfL network which has caused a huge drop in revenue. The Mayor of London has had to request several emergency grants from Central Government in order to keep the capital’s transport network running.</p> <p>23. The Comprehensive Spending Review, submitted to TfL’s Finance Committee on 30 September 2020, notes that passenger income fell by more than 90% compared to the previous year. A total of £1.9 billion was given by the Government to help keep the transport network running up until October 2020. The Mayor then sought a commitment of at least £5.65 billion over the remainder of 2020/21 and 2021/22, with £4.9 billion needed to allow the network to keep running and £750 million for the delivery of Crossrail, however this was not granted.</p> <p>24. On 1 November 2020, TfL received a £1.8 billion bailout from the Government which secured funding until 31 March 2021. On 22 March 2021 an additional £485 million was secured up until 18 May 2021.</p> <p>25. As such, it is clear that TfL is currently living a “hand-to-mouth” existence, without the ability to secure funding for huge investment projects including the BLE.</p> <p>26. As part of this Spending Review, TfL has decided that the BLE will not form part of its spending priorities in the next decade. Therefore, there is still no funding secured for the construction of the BLE and the emerging Local Plan needs to account for this uncertainty.</p> <p>27. If the BLE is not to be delivered for at least the next 10 years (and with the best will, it is likely to be at least 15 years before it is under construction) then a large number of sites within Lewisham Borough will become sterile and will not be able to deliver much needed housing and regeneration in the Borough.</p> <p>28. Further, there is no guarantee that the BLE will progress after 10 years so development on these sites may be pushed back for 20 or more years which will severely inhibit investment and growth.</p> <p>29. Since the onset of the pandemic, there has been a significant change in travel patterns, with many people working from home. As normality returns, there will be a need to reassess public transport investment in light of reduced passenger</p>	<p>already been through a consultation carried out by TfL and have been safeguarded by Government. This falls outside of the scope of the Local Plan.</p>	
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		<p>numbers and less pressure on peak travel as people are more flexible with commuting times.</p> <p>30. The December 2019 TfL consultation stated that an application to the Secretary of State for a TWAO (Transport and Works Act Order) will not be made before 2023. However, on 1 March 2021 the Department for Transport issued a safeguarding direction for the proposed route of the BLE. This includes ‘Area of Surface Interest’, which includes the whole of the Sainsbury’s site and ‘Area of Subsurface Interest’ which includes the southwest corner of the site.</p> <p>31. The safeguarding direction does not contain any review or expiry date which creates great uncertainty for landowners, staff employed on the site and the local community, particularly when there is still uncertainty about funding for the BLE and its delivery, even in the long term.</p> <p>32. To prevent the redevelopment of an available and deliverable brownfield site is unacceptable. There is no certainty that the BLE will ever be delivered. It has no timescale for delivery and no funding.</p> <p>33. In short, the allocation for the BLE station should be removed until the business case is proven. The desire to accommodate the BLE should not prohibit the significant and immediate redevelopment of the site which would bring substantial benefits to the local community and the Borough as a whole.</p>		
WSP (Sainsbury’s Supermarkets Ltd obo)	LNA SA 09	<p>The Location of New Cross Gate Station</p> <p>34. At paragraph 15.58 it is noted that the site can accommodate a new station for the BLE. There is simply no evidence or justification as to why the New Cross Gate Retail Park site is an appropriate site for a new station.</p> <p>35. The choice of New Cross Gate Retail Park is referred to in TfL’s Stations Overview consultation document (2019) as follows:</p> <p><i>“In the 2017 consultation we consulted on our proposed site for the station being the site of the retail park lying on the west side of the existing New Cross Gate Rail station. A majority of respondents expressed support for this proposal.”</i></p> <p>36. We can find no further or fuller explanation as to why New Cross Gate Retail Park has been chosen by TfL. There does not appear to be any strategic environmental assessment (SEA) undertaken by TfL or any in-depth evidence based analysis, including a cost/benefit analysis to justify this selection.</p> <p>37. Furthermore, it is misleading to state that a majority of respondents expressed support for the proposal. At that time, TfL did not acknowledge that the existing Sainsbury’s store will need to close as a result.</p> <p>38. Several stakeholders including local councillors (Cllr Charlie Davis and Cllr Liz Johnston-Franklin) have expressed concern over the loss of the Sainsbury’s store, particularly in conjunction with the Tesco store in Old Kent Road, including the increased journeys to other supermarkets and the impacts of the closures as local employers.</p> <p>39. London First, who represent a number of businesses, and Goldsmiths University have also expressed concern over the plans at New Cross Gate. The Civil Service Pensioners Alliance is concerned over the loss of the Sainsbury’s</p>	Comments are noted. The routing of the BLE, and the location of stations and required works sites associated with constructing the BLE, have already been through a consultation carried out by TfL and have been safeguarded by Government. This falls outside of the scope of the Local Plan.	No change.

		<p>store and the impact of a lack of large supermarkets in the area which would result from the works at this site.</p> <p>40. Finally, none of the TfL consultations have provided any information on how the buses which currently use the Sainsbury’s site would be relocated during the construction period of the station. This is a matter about which local people will want to be informed.</p> <p>41. SSL does not believe that there has been adequate and effective consultation on the location of the station by TfL and the significant socio-economic and retail impacts of the loss of the Sainsbury’s store have not been addressed. If the new Local Plan allocates the site for a new station, it will be incumbent upon the Council to undertake this work.</p> <p>42. The location of the station at New Cross Gate Retail Park as an interchange would be inefficient compared to the Goodwood Road site which is better located in relation to New Cross District Centre and Goldsmiths University, so reducing travel distances and journey times when changing trains.</p>		
WSP (Sainsbury’s Supermarkets Ltd obo)	LNA SA 09	<p>A Tunnelling Worksite at New Cross Gate Retail Park</p> <p>46. TfL’s preferred location for a tunnelling work site is the New Cross Gate Retail Park site. The new Local Plan does not mention this, only that the site is allocated for ‘land and facilities required to accommodate’ the BLE. If the intention is that the site is to be a tunnelling work site, this should be made clear in the new Local Plan. There has not been an objective and transparent assessment of the tunnelling worksite location alternatives.</p> <p>47. Leaving aside the socio-economic impacts of the site being used as a tunnelling work site, SSL also have technical concerns about the appropriateness of the New Cross Gate Retail Park site.</p> <p>48. A technical note from Dr Sauer and Partners (DSP) is provided at Appendix C. This addresses the tunnelling worksite proposals within the current consultation. It confirms that there is no over-riding technical reason as to why the worksite is ‘best’ located at New Cross Gate Retail Park. Indeed, the opposite is true as the opportunity to move spoil by rail from New Cross Gate Retail Park is very limited.</p> <p>49. However, DSP confirm that there is an option to accommodate the tunnelling worksite at the Wearside Road Depot, which has been dismissed by TfL due to its size (based upon an arbitrary size of 2.4ha). DSP demonstrate that the site could be expanded beyond the area considered by TfL to provide a suitably sized site, based on TfL’s criteria. Indeed, due to the availability of more trains in this location, DSP also identify that the required site size at the Wearside Road Depot could be smaller than that proposed at New Cross Gate Retail Park, as the requirement for spoil stockpiling and storage of tunnel segments would be less with the enhanced accessibility by rail of the Wearside Road Depot site.</p> <p>50. DSP also confirm that the location of a tunnel launching site at the Wearside Road Depot could significantly reduce the tunnel boring construction programme as it provides far greater locational efficiencies in terms of the requirements for assembly and disassembly of tunnel boring machines.</p>	Comments are noted. Disagree that Wearside Road Depot should be safeguarded and allocated as a tunnelling site. The routing of the BLE, and the location of stations and required works sites associated with constructing the BLE, have already been through a consultation carried out by TfL and have been safeguarded by Government. This falls outside of the scope of the Local Plan.	No change.

		<p>51. Further technical work has been undertaken by Intermodality. Intermodality have had regard to the implications on the rail network of the associated freight movements required to remove spoil and allow for the loading and unloading of materials. The Intermodality Assessment is provided in full at Appendix D.</p> <p>52. In summary, Intermodality have identified critical gaps in the consideration of worksite options by TfL which undermine the selection of New Cross Gate Retail Park as the primary preferred tunnelling worksite option and raise serious questions over the robustness of TfL’s approach.</p> <p>53. The New Cross Gate Retail Park site sits within a heavily congested part of the London rail network, with very limited slack in the daily scheduling. Heavy freight movements are necessarily slow and have the potential to severely disrupt passenger services.</p> <p>54. Intermodality confirm that both Wearside Road Depot and Hither Green sites have the potential to be better worksite options because they are located where there is greater network capacity to accommodate freight movements and onward connections to facilitate the disposal of spoil.</p> <p>55. Furthermore, the capacity of the site to accommodate storage of spoil and other materials is not confirmed; and the risk of interruption to passenger services is far greater, with the associated implications for the surrounding network far more severe.</p> <p>56. Finally, the tunnelling worksite at New Cross Gate Retail Park will require development of a Site of Importance for Nature Conservation (SINC). The impact on this protected site has not been assessed.</p> <p>57. It is clear from this work that there are at least two more appropriate sites at Hither Green and Wearside Road. Both represent better alternatives with respect to surrounding rail network capacity and opportunity to overcome constraints.</p> <p>58. Wearside Road Depot is currently not allocated in the new Local Plan.</p> <p>59. The analysis by DSP and Intermodality confirms that the Wearside Depot is a better tunnelling worksite than the New Cross Gate site because:</p> <ul style="list-style-type: none">▪it is located at the southern end of the BLE and thereby allowing the tunnel boring machines to have two drives rather than four if the tunnels were launched from New Cross Gate Retail Park. This has significant construction programme implications;▪it is better located to facilitate the removal of spoil by rail, being on a less congested part of the network;▪it would have fewer environmental impacts as trains would not be restricted to night-time movements only, and▪it would not sterilise a valuable regeneration site with advanced redevelopment plans. <p>60. For these reasons, if the new Local Plan does make allowance for the BLE, the Wearside Road Depot should be safeguarded and allocated as a tunnelling site.</p>		
WSP (Sainsbury’s	LNA SA 09	The Economic Impact of Closure of Sainsbury’s	Comments and supplementary information	No change.

Supermarkets Ltd obo)	<p>61. The Stations Overview consultation document which formed part of the December 2019 TfL consultation, confirms that TfL is proposing a new station at New Cross Gate Retail Park. It goes on to confirm that:</p> <p><i>“At the last consultation we stated that there could be a potential loss of the Sainsbury’s supermarket during the construction period. As we have developed our plans for the site to incorporate the primary tunnelling worksite, it has become clearer that the current supermarket, other retailers and petrol station would not be able to remain operational on the site during construction.”</i></p> <p>62. It is clear that the allocation of this site for land and facilities to accommodate the BLE will mean that the businesses at New Cross Gate Retail Park will be forced to close. This will have significant negative impact on: Sainsbury’s business; the people currently employed on the site; the regeneration of the area in the short term; the wider community; and New Cross/New Cross Gate District Centre.</p> <p>63. The socio-economic implications of the loss of the Sainsbury’s store are explained in full technical detail at Appendix A.</p> <p>64. The socio-economic analysis confirms that the Sainsbury’s store and the area surrounding it is within Lewisham’s lower super-output areas (LSOAs) that have been assessed as some of the most deprived in England. The existing Sainsbury’s store is found to contribute positively to each of the seven domains which constitute the English Indices of Deprivation, including:</p> <ul style="list-style-type: none">▪Income deprivation;▪Employment deprivation;▪Education, skills and training deprivation;▪Health deprivation and disability;▪Crime;▪Barriers to housing and services; and▪Living environment deprivation. <p>65. Given the level of deprivation experienced within the New Cross Gate area, it is apparent that the removal of the Sainsbury's store in its current format will detrimentally impact the community and potentially worsen its relative deprivation.</p> <p>66. It is further estimated that the employment created by the existing Sainsbury’s store generates gross value added (GVA) of some £8.7million per annum. This is a permanent economic benefit which will be enjoyed in perpetuity if the store continues to trade and to employ the same number of staff members. This significant figure demonstrates the major contribution of the Sainsbury’s store to Lewisham’s economy.</p> <p>67. The analysis also estimates the additional value generated beyond labour productivity. This is referred to as social value, which represents a holistic evaluation of social, environmental and economic effects. Using a national</p>	<p>are noted. The routing of the BLE, and the location of stations and required works sites associated with constructing the BLE, have already been through a consultation carried out by TfL and have been safeguarded by Government. This falls outside of the scope of the Local Plan.</p>	
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		<p>framework for measuring social value, the socio-economic analysis estimates the social value of the store to be £4.8million per annum.</p> <p>68. These figures are noteworthy given the evident deprivation experienced in the immediate New Cross Gate area, demonstrating the positive contribution of the store to the local community. The removal of the Sainsbury’s store in its current format at New Cross Gate will be detrimental and undoubtedly lead to negative socio-economic impacts within the local community.</p> <p>69. The importance of local retail and access to food has become even more stark during the COVID-19 pandemic. Whilst the pandemic has altered the way people shop and the demand for online retail is growing, we consider that the provision of a supermarket in this location is vitally important for the area and local community.</p> <p>70. The socio-economic analysis further identifies that there would be an opportunity cost of not delivering redevelopment proposals at the New Cross Gate Retail Park site which will be delayed indefinitely if the site is allocated for the BLE station. It quantifies this as follows:</p> <ul style="list-style-type: none">▪The Gross Added Value of £10.9million per annum, representing an increase of £2.2million per year compared to current operations. Consequently, the cessation of the redevelopment plans and removal of the current store operations would see a loss of over £11 million each year. This is a conservative figure as it fails to account for other jobs that would be lost from other businesses operating in the immediate area who rely on the Sainsbury’s store as an ‘anchor store’ for the New Cross/New Cross Gate District Centre;▪The important contribution of the proposals to local housing need targets and the boost to local population which would generate circa £3.6 million for convenience expenditure and £6.5 million in comparison expenditure available to be spent within the New Cross/New Cross Gate District Centre;▪The boost to the New Cross/New Cross Gate District Centre turnover through an enhanced store, expanded Groceries Online (GOL) services and improved links with the adjoining District Centre. The enhanced GOL services (which have now been consented under LPA ref. DC/20/118401) are estimated to improve store turnover by £11m as well as having considerable sustainability benefits, including the reduction in car use and the flow on impacts of this on traffic, road incidents and air quality in the local area;▪Improvement in the shopping environment allowing for positive impacts on the New Cross/New Cross Gate District Centre;▪Continued promotion of active transport through the convenience offered by an accessible supermarket located within the surrounding neighbourhood; and▪Additional job creation through the construction required for the scheme. <p>71. In summary, the benefits associated with the regeneration of the New Cross Gate Retail Park site are extensive and would directly benefit the local economy,</p>		
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		<p>increase the housing stock and enhance community accessibility to vital services and infrastructure.</p> <p>72. Following consideration of the published information relating to options assessments, including station site selection undertaken by TfL, the socio-economic assessment concludes that although work has been undertaken by TfL to assess the costs and benefits of the BLE project and the location of the New Cross Gate station, the research and subsequent analysis does not account for the wider value and contribution to the local community of the existing Sainsbury’s store. In particular, it fails to capture the potential benefits of the Sainsbury’s redevelopment proposals which seek to drive additional value to the local community as explained above.</p>		
WSP (Sainsbury’s Supermarkets Ltd obo)	LNA SA 09	<p>The Retail Impact of Closure of Sainsbury’s Store</p> <p>73. Concern over the loss of the retail facilities at the Sainsbury’s site in New Cross Gate have been raised in previous TfL consultations, not only from SSL, but from members of public in response to the consultation process.</p> <p>74. This issue has been examined in greater technical detail by WSP (formerly WSP Indigo), who have undertaken a detailed Retail Impact Assessment (RIA) in October 2019. The RIA is appended in full at Appendix B.</p> <p>75. Assessing the impact of a number of scenarios, the RIA determines that the worst-case scenario for the New Cross/New Cross Gate District Centre is the loss of the Sainsbury’s store for ten plus years. This would result in the reduction of the District Centre’s turnover by some £55m, an impact of -73%. This is undoubtedly a significant adverse impact in terms of the performance of the District Centre that will fundamentally undermine its role and function within the retail hierarchy and seriously impact on its health, vitality and viability.</p> <p>76. Furthermore, the RIA identifies that the loss of the Sainsbury’s store will have significant implications in terms of access to essential grocery needs for many local residents, particularly those who rely on public transport; loss of jobs, which will also largely be felt by local residents; the unsustainable shopping patterns it will create, and the adverse highways impacts as a consequence of the closure of a popular store, diverting demand and trips to more distant stores; and the loss of in-store facilities and opportunities, including the pharmacy, Explore Learning and the local charitable benefits that are delivered through Sainsbury’s commitment to supporting their local communities.</p> <p>77. The pandemic has shown how important it is for the community to have access to affordable food and essential products, in close proximity to where they live. Stores such as the New Cross Gate Sainsbury’s are more important than ever as they provide a huge range of products and are situated at the heart of the community, within the District Centre.</p> <p>78. The range and extent of quantitative and qualitative impacts identified represent a fundamental conflict with national and local planning policy (including the NPPF and the adopted London Plan) to support town centres, facilitating their growth, diversification and adaptation to meet the needs of their local communities.</p>	Comments and supplementary information are noted. The routing of the BLE, and the location of stations and required works sites associated with constructing the BLE, have already been through a consultation carried out by TfL and have been safeguarded by Government. This falls outside of the scope of the Local Plan.	No change.

		<p>79. The Council’s retail evidence base, the Lewisham Retail Capacity Study 2019 Update supports the findings of the RIA at Appendix B. The Retail Study Update recognises the importance of the existing Sainsbury’s store in New Cross/New Cross Gate District Centre. Paragraph 2.20 of the Retail Study Update states that the household survey found that the Sainsbury’s store was one of the most popular destinations for convenience goods shopping for residents in the survey area, recognising that it is a well-used store helping to meet the shopping needs of local residents. As such, the redevelopment of the site would mean that those residents who currently shop at the store would have to travel to stores further afield to undertake their main food shopping.</p> <p>80. Furthermore, Table 5 of the Retail Study Update highlights the importance of the Sainsbury’s store to the vitality and viability of the New Cross/New Cross Gate District Centre. Table 5 shows that the current Sainsbury’s store accounts for approximately 70% of the District Centre’s convenience turnover. As such, the loss of the Sainsbury’s store will significantly reduce the turnover of the District Centre and have a significant adverse impact upon it.</p>		
WSP (Sainsbury’s Supermarkets Ltd obo)	LNA SA 09	<p>Former Hatcham Works, New Cross Road</p> <p>85. The site should be identified as New Cross Gate Retail Park, or the Sainsbury’s site. The reference to the Former Hatcham Works is misleading for the reasons set out above.</p> <p>86. The reference to the BLE should be removed from the allocation. The site should be allocated for mixed use development to provide a new Sainsbury’s store, a minimum of 912 new homes and employment and ‘main town centre’ floorspace for delivery in the first five years of the new Plan period.</p>	<p>Disagree. Hatcham is well recognised by the local community and is part of the heritage of the area, being reflected in the name of the nearby Conservation Area.</p> <p>Disagree that reference to the BLE should be removed from the Local Plan. Whilst the planned growth within the Local Plan is not predicated solely on the delivery of the BLE, the Council fully supports this important transport infrastructure project that will be critical to the borough in the future. Furthermore the routing of the BLE, and the location of stations and required works sites associated with constructing the BLE, have already been through a consultation carried out by TfL and have been safeguarded by Government.</p>	No change.
WSP (Sainsbury’s Supermarkets Ltd obo)	General LNA SA 09	<p>89. We trust that these representations will be fully considered by the Council, and that the next iteration of the new Local Plan amended accordingly to ensure that SSL’s New Cross Gate Retail Park site can be brought forward for much needed regeneration in the short term.</p>	Comments noted.	No change.

WSP (Sainsbury's Supermarkets Ltd obo)	General LNA SA 09	<i>LB Lewisham officer note: The submitted response is also accompanied by four appendices.</i> <ul style="list-style-type: none">- <i>Appendix A: Cost benefit Analysis for Bakerloo Line Extension.</i>- <i>Appendix B: Sainsbury's New Cross Gate, New Cross, Lewisham Retail Statement including Appendices 1, 2 and 3.</i>- <i>Appendix C: Review of tunnelling aspects presented in TFL's public consultation documents with a focus on New Cross Gate.</i>- <i>Appendix D: Review of proposed work sites for construction: rail accessibility.</i>		The supplementary information is noted.	No change.
WSP (Sainsbury's Supermarkets Ltd obo)	3	LNA SA 10	Goodwood Road and New Cross Road 87. If reference to the BLE is to be retained in the new Local Plan, the Goodwood Road and New Cross Road site should be allocated to accommodate a new station to serve the BLE. Wearside Road Depot. 88. If reference to the BLE is to be retained in the new Local Plan, the Wearside Road Depot site should be safeguarded or allocated as a tunnelling work site for the BLE.	Comments are noted. Disagree that Wearside Road Depot should be safeguarded and allocated as a tunnelling site. The routing of the BLE, and the location of stations and required works sites associated with constructing the BLE, have already been through a consultation carried out by TfL and have been safeguarded by Government. This falls outside of the scope of the Local Plan.	No change.
WSP (Sainsbury's Supermarkets Ltd obo)	3	LNA SA 10	The Goodwood Road Site 43. Goodwood Road is allocated for a mixed-use scheme including 112 new houses. SSL are firmly of the view that this is a more appropriate and suitable site for a station for the BLE. 44. Not only will the Goodwood Road site allow for a better interchange between the BLE and rail and bus services, it is a more appropriate station location because: <ul style="list-style-type: none">- it will have significantly less social and economic impacts, and less cost;- it has been vacant for many years and is deliverable;- it has better access to other services within the New Cross/New Cross Gate District Centre;- it will, through Goodwood Road, have an acceptable access route which would not undermine the surrounding highways network;- it will have the least impact in terms of job losses;- it will have the least impact on the local community because there will be no loss of key shopping facilities;- it will have the least impact in terms of the loss of delivery of new homes;- it will have the least impact upon the vitality and viability New Cross/New Cross Gate District Centre; and- it will allow a vital regeneration scheme to come forward at New Cross Gate Retail Park which will deliver a new Sainsbury's store (with no	Comments are noted. Disagree that Wearside Road Depot should be safeguarded and allocated as a tunnelling site. The routing of the BLE, and the location of stations and required works sites associated with constructing the BLE, have already been through a consultation carried out by TfL and have been safeguarded by Government. This falls outside of the scope of the Local Plan.	No change.

			closure during the development phase). SSL’s site will deliver at least 912 new homes compared to 112 at Goodwood Road.		
			45. In short, the most sustainable and appropriate location for a new station for the BLE is the Goodwood Road site. This site should be identified as the preferred location for a new BLE station.		
Cockpit Arts (The Planning Lab obo)	- 3	General LNA SA 14	Lewisham Local Plan January 2021 Consultation response from Cockpit Arts, 18-22 Creekside, Deptford SE8 3DZ Cockpit Arts, Creekside, Deptford, is pleased to respond to the consultation on Lewisham’s new Local Plan (main issues and preferred options). We are a charity that provides studio spaces and business development support for makers at affordable rent levels. We have two principal sites; one in Holborn, and one in Deptford. We have occupied our Deptford site since 2001, where we accommodate more than 60 makers in our small workshop spaces. Cockpit Arts is a leading resident of the creative community of Lewisham, enjoying an international profile and reputation which sees us regularly delivering overseas programmes and welcoming visitors from around the globe who want to learn from our model.	The supplementary information is noted.	No change.
Cockpit Arts (The Planning Lab obo)	- 3	General LNA SA 14	Overall, Cockpit Arts is supportive of the aims of the plan and many of the specific policies, including those that aim to protect and enhance a wide range of creative and cultural uses in the borough. We have provided our responses in relation to individual topic areas/policies in a table, below.	Support noted.	No change.
Cockpit Arts (The Planning Lab obo)	- 3	General LNA SA 14	Notwithstanding this key concern, we suggest some ways – below - in which this and related policies in the new Plan could be strengthened to support the development of sites in line with policies in the Plan where different developers are involved on different timescales. We would be very happy to discuss any of the issues we have raised here further with Officers at LB Lewisham as the new Plan is progressed to the next stage.	Comments noted.	No change.
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	- 3	General LNA SA 14	LEWISHAM LOCAL PLAN REGULATION 18 STAGE MAIN ISSUES AND PREFERRED APPROACHES DOCUMENT FORMAL CONSULTATION REPRESENTATIONS SUBMITTED ON BEHALF OF BELLWAY HOMES LTD AND PEABODY DEVELOPMENTS LTD We are instructed by Bellway Homes Ltd (“Bellway”) and Peabody Developments Ltd (“Peabody”) to submit representations to the Lewisham Local Plan Regulation 18 ‘Main Issues and Preferred Approaches Document’ January 2021 (“the draft Local Plan”) in the context of their landownership and live planning application at Sun Wharf, Creekside, Deptford, London, SE8 3DZ (“the site”), located within the London Borough of Lewisham (LBL).	Comments noted.	No change.
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	3	LNA SA 14	These representations relate to the site at Sun Wharf which forms part of the proposed site allocation ‘ 14: Sun Wharf Mixed-use Employment Location ’ within the draft Local Plan. <i>LB Lewisham officer note: A site plan is included in the original representation. The plan shows the site outlined in red.</i> (Drawing No. 3336A-PL(90)_00_P01). These representations also relate to the wider policies of the draft Local Plan.	Support and comments noted.	No change.

			The site has significant redevelopment potential and we support the site allocation and the principle of development to deliver a mixed use redevelopment comprising new residential uses, including affordable housing and provision of high quality employment floorspace. We have set out our detailed comments in this letter.		
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	- 3	General LNA SA 14	<p>Background</p> <p><i>Bellway Homes Ltd and Peabody Developments Ltd</i></p> <p>Bellway is a major national house-builder, with considerable expertise in delivering homes that people want to live in. Bellway is committed to developing the site who have a track record of working in some of London’s key regeneration areas. Bellway has delivered high quality mixed use redevelopment schemes within London and the South East. Bellway has established a particularly strong track record in London and deliver over 2,500 units per year across four divisions. Bellway Thames Gateway alone currently has over 30 active development sites. Whilst many in the development sector have been in financial difficulty in recent years, Bellway have emerged as a strong and well-run business with low debt.</p> <p>Peabody Developments Ltd, a wholly owned subsidiary of Peabody Trust, provides homes and services to more than 111,000 residents and 8,000 care and support customers. Peabody helps people make the most of their lives by providing good quality affordable homes, working with communities and promoting wellbeing. Increasing Peabody’s organisational capacity means they will have a development pipeline of over 6,000 affordable homes by 2021.</p> <p>Bellway and Peabody formed a joint venture partnership to deliver the proposed redevelopment scheme at Sun Wharf.</p> <p><i>Site and Surroundings</i></p> <p>The site measures approximately 0.73 hectares and is located in the northern part of Deptford. The site accommodates existing low-rise warehouse buildings currently in commercial use.</p> <p>The site is bound by Creekside (a local vehicle carriageway) and Cockpit Arts (a creative industries business incubator) to the west, railway arches to the south, Deptford Creek to the east, and Kent Wharf to the north. Kent Wharf is a mixed use scheme, also redeveloped by Bellway that has been completed and comprises 143 residential units and circa 1,300sqm of commercial floorspace.</p> <p>The site predominantly has a Public Transport Accessibility Level (PTAL) rating between 3 and 4 (moderate to good). However the site is better than the standard PTAL rating suggests since it is in close proximity to areas of PTAL 6a and is within walking distance to additional station and bus services.</p> <p>The Environment Agency’s Flood Map for Planning indicates that the site is situated within Flood Zone 3, within an area benefiting from flood defences.</p> <p><i>Planning Policy Context</i></p> <p>The site is subject to the following key adopted (current) planning policy designations:</p>	The supplementary information is noted.	No change.

			<ul style="list-style-type: none"> Part of Site Allocation SA11 “Sun and Kent Wharf Mixed use Employment Location”; Deptford Creek/Greenwich Riverside Opportunity Area as designated by the London Plan; Deptford and New Cross Creative Enterprise Zone as designated by the London Plan; Deptford Creekside Regeneration and Growth Area; Air Quality Management Area; and Archaeological Priority Area. <p><i>Current Application</i> In the latter part of 2020, Bellway and Peabody submitted a full planning application (Ref. DC/20/118229) for a residential-led, mixed use redevelopment at Sun Wharf proposing 251 homes and creative industry uses together with the delivery of new public realm and landscaping which would deliver on a range of planning and public benefits, including a minimum of 35% affordable housing.</p> <p>The description of development is as follows: <i>“Demolition of all existing buildings and comprehensive redevelopment to provide 3 new buildings ranging in heights of 3 to 20 storeys to provide 251 residential units (C3 Use Class) and approximately 1,233 sqm flexible commercial floorspace (B1/B8 Use Class) plus 311sqm flexible commercial floorspace (B1/A3) in a container building, together with associated wheelchair accessible vehicle parking, cycle parking, landscaping, play areas, public realm, improvements to river wall and public riverside walkway and associated works.”</i></p> <p>The application remains under consideration and a determination will be issued by LBL in due course.</p>		
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	- 3	General LNA SA 14	<p>Lewisham Local Plan Regulation 18 Stage Main Issues And Preferred Approaches Document – representations</p> <p>We note that the key principles of the adopted Site Allocation is being carried over to the draft Site Allocation as set out in the draft Local Plan. We note the site is subject to the following key planning policy designations:</p> <ul style="list-style-type: none"> Site Allocation 14: Sun Wharf Mixed-use Employment Location; Deptford Creek/Greenwich Riverside Opportunity Area (as designated by the London Plan); Deptford and New Cross Creative Enterprise Zone (as designated by the London Plan); Deptford Creekside Cultural Quarter; Waterlink Way; Archaeological Priority Area; and Air Quality Management Area. <p>We have noted the national planning context in preparing Local Plans, and have then commented on the draft Local Plan in detail, as set out below.</p>	Comments noted.	No change.
Bellway Homes Ltd and Peabody Developments	- 3	General LNA SA 14	<p><i>National Planning Policy Context</i></p> <p>Paragraph 35 of the NPPF (National Planning Policy Framework) states that Local Plans and spatial development strategies are examined to assess whether they</p>	Comments noted.	No change.

Ltd (Savills obo)			<p>have been prepared in accordance with legal and procedural requirements and whether they are sound. Plans are ‘sound’ if they are:</p> <p><i>a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs¹⁹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</i></p> <p><i>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</i></p> <p><i>c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</i></p> <p><i>d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.</i></p> <p>These tests of soundness should also be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies of the area.</p>		
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	- 3	General LNA SA 14	<p>Public Examination</p> <p>On behalf of our Client we consider it is necessary we attend the oral part of the Examination in Public. We would be grateful if you could keep us updated.</p> <p>Conclusion</p> <p>In summary, our Client supports the principle of the Site Allocation 14 for the redevelopment of the site which would provide significant public benefits including employment and new housing. However, with the suggested amendments we consider that the draft Local Plan would be sound.</p> <p>However, some of the items noted above in their current form would constrain potential redevelopment options and would therefore, not be effective in their delivery and would not be consistent with national policy. Therefore, it is considered that the draft Local Plan is not sound.</p> <p>Please do not hesitate to contact me to arrange a meeting and/or you have any further queries. In any event, we would be grateful if you could keep us updated of the progress with the new draft Lewisham Local Plan.</p>	Comments noted.	No change.
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	3	LNA SA 14	<p>Site Allocation 14: Sun Wharf Mixed-use Employment Location (“Site Allocation 14”)</p> <p>Fundamentally, our Client fully supports the principle of development for residential and employment/commercial uses for draft Site Allocation 14.</p> <p>Compared to the adopted Site Allocation, we note that the draft Site Allocation boundary has been amended to omit Kent Wharf. We have concluded this is likely to be because Kent Wharf has been redeveloped (by Bellway) and is now completed and occupied. On this basis, the boundary update appears reasonable. We note that the updated boundary for the site allocation therefore includes the remaining land parcels: the Site (i.e. Sun Wharf), as well as well as the adjacent Cockpit Arts site and the adjacent Network Rail arches. In the interests of clarity, the red line boundary and site address should be more explicit that the draft Site Allocation includes the area underneath the Network Rail arches.</p>	Support noted. Agree that the site name should be amended.	Local Plan amended to acknowledge Network Rail arches in site name.

Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	3	LNA SA 14	As part of the “Indicative Development Capacity” section on page 616 of the draft Local Plan, we note that it states 235 net residential units. Under the current submitted application, 251 residential units are proposed and has been developed via a design-led approach, taking into account the guidelines of the aspirations of the adopted Site Allocation and planning policies. We consider that the drafting should be updated to state 251 residential units, and that it is made explicit that the figure for the residential units is a minimum requirement, and/or starting point. This would ensure that the draft Local Plan is effective in its delivery of new homes, as well as affordable homes.	<p>Where no advanced pre-application has taken place, the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Site Allocations Background Paper.</p> <p>Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the scale of development resulting from the planning consent granted for the part of the site and current application as well as the need to protect the heritage setting of the site. Based on these considerations, the capacity has been amended.</p> <p>Optimal capacity for the site will be established at planning application stage through a design led approach.</p>	Sun Wharf MEL site allocation amended to reduce residential capacity to 220 units and reduce employment floorspace to 1,443m².
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	3	LNA SA 14	We also note that the draft Site Allocation provides an indicative development capacity of gross-non-residential floorspace as “ <i>Employment 1,933</i> ”. The supporting policy text should make it clear that any quantum of commercial floorspace reflects a design-led approach, and/or that consideration will be also be given to employment densities.	The Local Plan provides indicative floorspace. Optimal floorspace for the site will be established at planning application stage through a design led approach.	Local Plan amended at the start of Part 3 to clarify floorspace is indicative and that employment densities should be taken into account.
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	3	LNA SA 14	We note that the PTAL states between 0 to 3. Whilst we consider that the site ranges between 3 and 4 for the Sun Wharf site, we would consider the text be updated to acknowledge that fundamentally the site has a better than the standard PTAL rating, since it is in close proximity to areas of PTAL 6a and is within walking distance to additional station and bus services and also the Deptford Town Centre.	Disagree, as the site’s PTAL is already noted.	No change,
Bellway Homes Ltd and Peabody Developments	3	LNA SA 14	Under the “Site allocation” heading on page 617 of the draft Local Plan, it states “ <i>Comprehensive mixed-use employment led redevelopment...</i> ”. We consider that the drafting should be updated to state “ <i>Comprehensive mixed-use residential-led redevelopment including residential and employment/commercial uses...</i> ”. This would ensure it is consistent with the table on page 618 of the draft Local	Disagree. The focus of the site allocation is on employment-led redevelopment, in order to	No change.

Ltd (Savills obo)			Plan. It would also ensure that sufficient levels of new homes together with new creative industries/local commercial floorspace would promote and encourage vibrancy and activity for this locality and the future redevelopment. This will ensure that the draft Local Plan has been positively prepared and effective so that it can deliver the optimum number of residential units and commercial floorspace, together with associated new jobs.	support the Deptford Creekside Cultural Quarter	
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	3	LNA SA 14	<p>We note the inclusion of Creative Enterprise Zone and Cultural Quarter. This is indeed reflective of the creative industries locality and would also align with the aspirations to deliver new creative industries floorspace at the site, and is supported by our Client.</p> <p>Our Client is also supportive of the overall development aspirations for the Site Allocation as set out in the supporting policy text on pages 617 and 618 of the draft Local Plan as they are considered that these aspects are important to the overall regeneration of the site.</p>	Support noted.	No change.
Bellway Homes Ltd and Peabody Developments Ltd (Savills obo)	3	LNA SA 14	As it relates to tall buildings, we note that paragraph 15.83 states there the potential for taller building elements, and that the taller elements should be located in the south west corner of the site. Whilst this is reflective of the current planning application (and that the principle of tall buildings is supported), it is considered that the policy text is overly prescriptive and should be amended to ensure it is more flexibly drafted i.e. it should simply say that tall buildings and their precise location will be a design-led approach. This will ensure there is sufficient flexibility and that the site is deliverable , and would therefore be effective .	Agree that a design-led approach should be used when determining the location of tall buildings.	Sun Wharf MEL site allocation amended to incorporate “considered as part of a design-led approach”.
Cockpit Arts (The Planning Lab obo)	3 2	LNA SA 14 EC 06	<p>In addition to these responses, we are also keen to draw to LB Lewisham’s attention to an apparent conflict between the emerging Local Plan and development activity/proposals within Site Allocation 14, Sun Wharf, in which Cockpit Arts’ Deptford building sits.</p> <p>The Cockpit site is currently part of the adopted Local Plan (2013) site allocation SA11; and formerly part of a wider 2014 masterplan scheme that is now being progressed (only in part) by Bellway and Peabody. This includes the redevelopment of Kent Wharf (now delivered) and Sun Wharf, that is subject to a current planning application under consideration (ref DC/20/118229). Under various plans considered, prior to the submission of the current Sun Wharf application, provision was to be made for an expanded Cockpit in a larger and taller building on site. Following Bellway's decision to progress without Cockpit, we are now progressing our own plans for the development of the Cockpit Arts site, which accord with the aspirations of the masterplan and Site Allocation, and that we intend to bring forward in the near future.</p> <p>Nonetheless, we are concerned, having reviewed the draft new Local Plan, that the developments progressed (Kent Wharf) and currently under consideration (Sun Wharf, ref. DC/20/118229) do not reflect the aspirations of emerging Site Allocation 14 – Sun Wharf; or draft Policy EC6. Specific comments are set out in the table below. In summary, Cockpit Arts notes that the current Sun Wharf planning application is residential-led, which is fundamentally at odds with the mixed-use employment-led designation of Site Allocation 14 and Policy EC6. It is highly likely that this scheme will have been determined before the new Plan is significantly progressed, meaning that the redevelopment of the significant</p>	Comments noted. Agree with the points made about co-ordination of applications.	Sun Wharf MEL site allocation amended by referring to partnership working, phasing and Policy DM3 (Masterplans and comprehensive development).

			<p>proportion of this site will not meet the aspirations of this site allocation, rendering it out of date before its adoption.</p> <p>The current Sun Wharf planning application is also not in accordance with the 2014 masterplan for the site, which again appears to conflict with the requirements of the emerging policy for development within Site Allocation 14 to be masterplan-led. This raises serious concerns for Cockpit Arts that development will be progressed that does not recognise/respect the potential for all parts of the site allocation, and which has the potential to limit future development within the site allocation by other owners/developers.</p> <p>Cockpit Arts is keen to understand more about how LB Lewisham plans to manage such conflicts, which could render Site Allocation 14 – and potentially others – null and void in advance of the new Plan being adopted.</p>		
Cockpit Arts (The Planning Lab obo)	3	LNA SA 14	<ul style="list-style-type: none"> • CA endorses the site allocation as mixed-use employment-led. • We are supportive of the requirement for masterplan-led development, but query how LB Lewisham will reconcile applications currently being determined within the site allocation, i.e. the Sun Wharf scheme, that are not in accordance with a masterplan in any meaningful way. • We would suggest that the specified development capacities are not truly reflective of employment-led development; rather, they are more residential-led and appear to be at odds with Policy EC6 for MELs. They are also unambitious, with a low capacity of employment floorspace envisaged (1,933m2), across the site allocation. This is a fraction of the residential development envisaged here. • How will the requirements of this site allocation be reflected in the determination of live planning applications which do not appear to conform, for example the current Sun-Wharf scheme which proposes residential-led development? CA is very concerned that the redevelopment of a large portion of this site is likely to have been delivered that will not meet the aspirations of this site allocation, rendering it out of date before its adoption. • We suggest that where proposals have already been delivered or are already under consideration by planning officers which do not meet the requirements for employment-led development as set out this site allocation, there needs to be more flexibility for other owners/developers within that area to develop in line with the overarching objectives in addition to safeguards to ensure there is not undue pressure on them to meet all of the shortfalls. • How does LB Lewisham define ‘positive frontage’ (the draft Plan refers to both ‘positive’ and ‘active’ frontages – what is the distinction between them?). • CA is supportive of the need for ‘compatible’ commercial, cultural, main town centre and residential uses and the guidelines for locating tall buildings in the south west corner of the site. • CA would highlight that the guidelines should ensure studio space of all types is provided, not just ‘artists’ studios’, to reflect and meet the need for space for all creative enterprises, including those not solely in the arts sector. This will help to ensure that the true, mixed creative identity of the area is both reflected and preserved. 	<p>Support and comments are noted. Agree with the points about co-ordination of applications.</p> <p>Active frontage is already mentioned in the site allocation.</p> <p>Agree that not just artist studios are provided.</p> <p>In terms of employment floorspace capacities, the Local Plan provides indicative site capacities. Optimal capacity for the site will be established at planning application stage through a design led approach.</p>	Sun Wharf MEL site allocation amended by referring to to all types of studio space and Policy DM3 (masterplans and comprehensive development).
Fifth State and (Avison Young obo)	- 3	General LNA SA 16	<p>Representations to Regulation 18 Consultation on draft Lewisham Local Plan: Main Issues and Preferred Approaches dated January 2021</p> <p>Joint Representation on behalf of Laurence Cohen and Melanie Curtis (Freehold Landowners) and Fifth State Ltd (Developer of 5-9 Creekside, Deptford)</p>	Comments noted.	No change.

			<p>We write on behalf of Laurence Cohen and Melanie Curtis and Fifth State (the Owners and Developer) in representation to the draft Lewisham Local Plan ‘Main Issues and Preferred Approaches’ document (January 2021) prepared by the London Borough of Lewisham (LBL), under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.</p> <p>Having reviewed the Regulation 18 version of the draft Local Plan and the accompanying evidence base documents, and attended the online engagement event focused on the North Area (held by LBL on 15 March), this letter provides a summary of the site and background, responses to individual policies as well as further comments on the development potential of the site (Site Allocation 16 Lower Creekside Locally Significant Industrial Site).</p> <p>We hope that the comments on the individual policies within the draft Local Plan provided below will assist the Council during the next round of consultation on the Local Plan.</p>		
Fifth State and (Avison Young obo)	- 3	General LNA SA 16	<p>Context of the Representation (5-9 Creekside) This section summarises the site and surrounding area and outlines the emerging scheme proposals at 5-9 Creekside.</p> <p><i>Site and Surrounding Area</i> The site comprises an existing two storey building / part warehouse and servicing yard. The buildings are currently occupied by a wholesale alcohol distributor and cash and carry (Use Class B8) and artist studios (Use Class E). The total existing floorspace is 2,460 sqm.</p> <p>5-9 Creekside is bound to the east and south by Creekside Road. The northern boundary backs on to the Crossfields Estate and to the west of the site is 3 Creekside which comprises the Medina Works building which accommodates a mix of art gallery, studios and creative workspaces.</p> <p>The wider Deptford Creekside area is undergoing change, with nearby developments including The Fuel Tank employment space managed by Workspace, mixed-use commercial and residential developments at Kent Wharf, Sun Wharf and Faircharm Dock and the Trinity Laban Conservatoire of Music and Dance. 1 Creekside has received planning permission for an 8 storey building which will deliver 56 homes and 1,541 sqm of commercial space. In addition 2 and 3 Creekside are also going through the pre-application process and we are working collaboratively to develop the emerging proposals for all three sites.</p> <p><i>Emerging Development Proposals</i> Fifth State are currently holding pre-application discussions with planning officers at LBL regarding the emerging proposals at 5-9 Creekside. The emerging scheme proposals seek to respond to the wider vision of the changing character of Creekside and neighbouring sites, as well as the wider Deptford area. The key principles of the emerging design include:</p> <ul style="list-style-type: none">• Demolition of existing buildings to create replacement workspace on site which is being designed to respond to local market demand for employment space such as light industrial or creative industries and create an overall increase in jobs;• Delivering an employment-led mixed-use development including the introduction of co-location of student accommodation;	The supplementary information is noted.	No change.

			<ul style="list-style-type: none"> • Providing high quality student accommodation and complementary facilities which are suitable with the continued employment operation of the site; • Working collaboratively with neighbouring landowners to develop a comprehensive design approach to the regeneration of the area; and Responding positively to the Deptford Creekside Conservation Area. • The above principles have been underpinned by the relevant technical and environmental assessments. 		
Fifth State and (Avison Young obo)	- 3	General LNA SA 16	Comments on Local Plan Main Issues and Preferred Approaches Document A series of comments are provided below in respect of various sections of the Local Plan Main Issues and Preferred Approaches Document which are of relevance to the proposed redevelopment of 5-9 Creekside. Proposed policy changes or requests for amendments are underlined in the paragraphs below.	Comments noted.	No change.
Fifth State and (Avison Young obo)	- 3	General LNA SA 16	We reserve the right to make further comments in relation to the policy allocation at the next available opportunity. Next Steps We thank you for the opportunity to be involved in the on-going preparation of the Lewisham Local Plan and trust that our representations are helpful when preparing the next version of the Local Plan. The Owners and Developer of 5-9 Creekside are very keen to engage with LBL and wish to continue to be involved in subsequent consultations. Please do not hesitate to contact Avison Young should you wish to discuss any of the points raised above.	Comments noted.	No change.
Artworks Creekside (Avison Young obo)	- 3	General LNA SA 16	LEWISHAM LOCAL PLAN: REGULATION 18 CONSULTATION: WRITTEN REPRESENTATIONS OBO Artworks Creekside These representations are made on behalf of our client, Artworks Creekside, in relation to the Regulation 18 Local Plan Consultation: Main Issues and Preferred Approach to Proposed Changes to the Adopted Policies Map being undertaken by the London Borough of Lewisham. The consultation material comprises: <ul style="list-style-type: none"> • Local Plan: Main Issues and Preferred Approaches; • Proposed Changes to the Adopted Policies Map; • Integrated Impact Assessment and Non-Technical Summary; • Habitats Regulation Assessment; • Draft Infrastructure Delivery Plan; and • Relevant Evidence Base, including the Employment Land Review (2019), Site Allocations background paper (2021) and Residential Density Technical Paper (2020). Having reviewed the Regulation 18 version of the draft Local Plan and the accompanying evidence base documents, and attended the online engagement event focused on the North Area (held by LBL on 15 March), this letter provides a summary of the site and background, responses to individual policies as well as further comments on the development potential of the site (Site Allocation 16 : Lower Creekside Locally Significant Industrial Site).	Comments noted.	No change.
Artworks Creekside (Avison Young obo)	- 3	General LNA SA 16	Artworks Creekside make comment on the approach to industrial intensification within the LSIS – most particularly the inconsistent approach with the London Plan (2021), and the indicative development capacity of the draft Allocation. Further comment is also made on the draft Policy regarding Public Houses, and	Comments noted.	No change.

			<p>how the Council will assess proposals affected designated and non designated heritage assets.</p> <p>We hope that the comments on the individual policies within the draft Local Plan provided below will assist the Council during the next round of consultation on the Local Plan.</p>		
Artworks Creekside (Avison Young obo)	- 3	General LNA SA 16	<p>Context of the Representation</p> <p>This section summarises the site and surrounding area and outlines the emerging scheme proposals at for the sites under the ownership of Artworks Creekside. The extent of these sites are shown in Appendix I.</p> <p><i>LB Lewisham officer note: Appendix 1: 2 Creekside and 3 Creekside Site Plan is included in the original representation. The plan shows the two site boundaries in red.</i></p>	Comments noted.	No change.
Artworks Creekside (Avison Young obo)	- 3	General LNA SA 16	<p>Site and Surrounding Area</p> <p>2 Creekside</p> <p>2 Creekside is a 4 storey building, known as The Birds Nest public house and the associated land. The building has a partial basement, and this space alongside the ground floor is used as the public house (Sui Generis). At first and second floor is an ancillary hostel / HMO which is accessed through via an internal stairway from the ground floor. The third floor is occupied by a flat which benefit from an external amenity space.</p> <p>The building is in a poor condition and has suffered from a lack of investment having been through various ownerships in the recent past. The public house trade has suffered from changing national trends and the Birds Nest has been affected by this.</p> <p>The land associated with the building is currently in a mixture of commercial and employment generating uses. The Big Red is a static double-decked bus which last operated as bar and pizzeria, and which made use of external seating between the building and the DLR railway viaduct which runs to the south of the site.</p> <p>The eastern portion of the site is occupied by 8no. shipping containers which accommodate a range of creative business enterprises, and which provide affordable and flexible small commercial premises.</p> <p>3 Creekside</p> <p>3 Creekside includes a 2 storey building and associated single storey structures and is locally known as Medina Works. The building and the land associated are current used by a mixture of business as an art gallery, studio, café, creative workspaces and social space for the local community. The building benefits from large internal volumes with open floor plans and floor-to ceiling heights.</p> <p>The site does not include the two-storey warehouse structure topped with a double gabled roof directly to the north of 3 Creekside, and this falls within separate ownership under the postal address of 5-9 Creekside. We are working with the development team on this adjacent site in order to bring forward a masterplan led redevelopment strategy.</p>	The supplementary information is noted.	No change.

			<p>Emerging Development Proposals</p> <p>Artworks Creekside are currently holding pre-application discussions with planning officers at LBL regarding the emerging proposals at both 2 and 3 Creekside. The emerging scheme proposals seek to respond to the wider vision of the changing character of Creekside and neighbouring sites, as well as the wider Deptford area.</p> <p>The key principles of the emerging proposals include:</p> <ul style="list-style-type: none">• The creation of creative workspaces which align with their track record and approach to such spaces elsewhere:• The delivery of an employment-led mixed-use development that responds to the Council’s emerging policy designation and which deliver significantly more jobs than the existing site:• The integration of the development into the emerging Creative Quarter that the Council has identified for Creekside, and for the wider Deptford Area:• The successful integration of the Birds Nest public house into a development, and the provision of a viable public house which can act as a community hub:• A series of commercial and employment areas which are financially sustainable:• Residential development which assists in creating a vibrant community and achieves a successful mixed use development.		
Artworks Creekside (Avison Young obo)	- 3	General LNA SA 16	<p>We would therefore suggest that the recommendations set out in these representations should be carefully considered and incorporated into the proposed policy wording in order for the allocation policy to be found sound. We reserve the right to make further comments in relation to the policy allocation at the next available opportunity.</p> <p>Next Steps</p> <p>We thank you for the opportunity to be involved in the on-going preparation of the Lewisham Local Plan and trust that our representations are helpful when preparing the next version of the Local Plan.</p> <p>Artworks Creekside strongly consider that the viability of redevelopment proposals should be understood by the Council in further drafting of Site Allocation 16, and as such are very keen to engage with Council and wish to continue to be involved in subsequent consultations. Please do not hesitate to contact us.</p>	Comments noted.	No change.
Fifth State and (Avison Young obo)	3	LNA SA 16	<p>Comments on draft Site Allocation 16 (Lower Creekside Locally Significant Industrial Site)</p> <p>The following sections assess the soundness of the draft Site Allocation 16 in accordance with Paragraph 35 of the National Planning Policy Framework (NPPF) (2019), which states that a Local Plan should be positively prepared, justified, effective and consistent with national planning policy.</p> <p><i>LB Lewisham officer note: Appendix 1 Draft Site Allocation 16 is included in the original representation.</i></p> <p>Site Allocation (Indicative Development Capacity)</p> <p>Site Allocation 16 comprises a number of development sites along Lower Creekside, including 5-9 Creekside which is bound by the road to the south and east.</p>	<p>Comments relating the Site Allocations Background Paper are noted.</p> <p>Where no advanced pre-application has taken place, the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Site Allocations Background Paper.</p>	No change.

			<p>The summary page identifies that the whole site allocation comprises 1.1 ha, and has an indicative capacity for 160 residential units and 8,201 sqm of employment floorspace. We note that the site allocation has reduced from the 255 residential units previously identified in the March 2020 draft Local Plan (which was not consulted on).</p> <p>The Site Allocation Background Paper (January 2021) which underpins the draft Local Plan identifies that the indicative capacities should not be read prescriptively and the actual development capacity of a site will need to be established through detailed design. Indicative site capacities are based on either existing planning consents, pre-application stage proposals, masterplan studies or SHLAA density assumptions (taking account of sensitivity assumptions on heritage assets for example). On LSIS co-location sites, a general assumption of 33% employment floorspace and 67% residential uses is suggested.</p> <p>Appendix A of the Site Allocation Background Paper outlines that for Lower Creekside LSIS the standard method (SHLAA) plus sensitivity analysis was undertaken to establish the 160 residential unit capacity. We consider that in accordance with the SHLAA density assumptions, a site within an Opportunity Area with a PTAL of 4-6 could accommodate up to 355 homes (within an Urban location). <u>Whilst we acknowledge that there are heritage sensitivities within Lower Creekside, we consider that the indicative development capacity of 160 new homes is significantly lower than what could reasonably be delivered through the redevelopment of Lower Creekside taking a design-led approach to site optimisation.</u></p> <p>This position is evidenced through pre-application design development at 5-9 Creekside and neighbouring 2 and 3 Creekside sites which indicates that the site allocation may have a greater site capacity, taking into account heritage, townscape, environmental and technical considerations. In addition given that the development at 1 Creekside (LBL ref; DC/18/106708) was approved at a density of 350 units per hectare (with a site area of 0.1ha), the indicative development capacity of 160 residential units across the 1.1ha is significantly lower than what could reasonably be delivered through the redevelopment of Lower Creekside taking a design led approach.</p> <p><u>As such it is requested that the indicative development capacity is increased, or it is made clear that the figure provided is in no way a cap on development potential.</u></p>	<p>Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the scale of development resulting from the planning consent granted for the part of the site and current pre-application discussions as well as the need to protect the heritage setting of the site.. Based on these considerations, the capacity has remained the same.</p> <p>Optimal capacity for the site will be established at planning application stage through a design led approach.</p>	
Fifth State and (Avison Young obo)	3	LNA SA 16 Para 15.88	<p><i>Site Allocation (paragraph 15.88)</i></p> <p>The site is allocated for comprehensive employment led redevelopment. Co-location of compatible commercial, residential and complementary uses are supported within the current drafting. <u>Fifth State request that the proposed co-location uses also include PBSA, which is considered to be suitable in this location, subject to complying with London Plan Policy H15 and draft Local Plan Policy HO8.</u></p>	Support noted. Disagree as the SHMA has identified that Lewisham has already contributed a significant amount of student bed spaces and the greatest need in the Borough is for conventional housing.	No change.
Fifth State and (Avison Young obo)	3	LNA SA 16	<p><i>Opportunities (paragraph 15.89)</i></p> <p>The Owners and Developer of 5-9 Creekside support the opportunities provided in draft paragraph 15.89, but also consider that <u>reference to the site being</u></p>	Support noted. Agree that referencing the Deptford Creek / Greenwich	Lower Creekside LSIS site allocation amended to refer to the Deptford Creek / Greenwich

		Para 15.89	located in the Deptford Creek / Greenwich Riverside Opportunity Area should also be acknowledged, as this is envisaged to provide new jobs and homes through the plan period.	Riverside Opportunity Area will be useful.	Riverside Opportunity Area.
Fifth State and (Avison Young obo)	3	LNA SA 16 Para 15.90	<p><i>Development requirements (paragraph 15.90)</i></p> <p>The Owners and Developer of 5-9 Creekside support the development requirements to not reduce industrial capacity or compromise the functional integrity of the employment location. The emerging development proposals seek to deliver new active frontages along Creekside which is also supported in this section of the allocation.</p> <p>We do however question the requirement that development must be delivered in accordance with a masterplan to ensure the appropriate co-location of employment and other uses across the site. <u>We suggest that this point is altered to state that designs for individual sites should demonstrate that they have been co-ordinated with neighbours.</u> The principle of mixed use development on the sites is already secured via the Site Allocation, and we consider the nature of the area and existing uses does not require a masterplan to be approved in order for the aspirations of the site allocation to be realised.</p>	Support noted. Disagree, as masterplans should be used to bring forward a number of sites as part of the wider regeneration of an area. Masterplans are covered in Policy DM3 of the Local Plan.	Lower Creekside LSIS site allocation amended to refer to Policy DM3 (Masterplan and comprehensive development)
Fifth State and (Avison Young obo)	3	LNA SA 16 Para 15.91	<p><i>Development guidelines (paragraph 15.91)</i></p> <p>We agree that non-employment uses, including residential uses, must be sensitively integrated into the development through considering operational requirements of future employment uses.</p> <p>Fifth State consider the 5-9 Creekside site is suitable to accommodate new workspace including artist studios and other SME accommodation.</p> <p>We understand that building heights will need to be designed having regard to designated and non-designated heritage assets, including St Paul’s Church, Deptford Church Street, the Crossfields Estate and the Deptford Creek Conservation Area (and as such will be assessed against the relevant heritage legislation and policies as considered in further detail earlier in this letter). We support that new developments should be designed having regard to the character and amenity of the Trinity Laban Centre, the Faircharm site, the buildings opposite the Creek in Greenwich, development at the former Tidemill School and the elevated DLR. <u>We request that the development currently under construction at 1 Creekside (which forms part of the site allocation) is also added to the list of buildings which should be considered as part of the emerging character of the area. The development at 1 Creekside establishes a number of design principles which will inform the design approach for other sites within Site Allocation 16, including height and massing.</u></p>	Comments noted. Agree that the emerging building at 1 Creekside should be taken into account as part of the emerging character of the area.	Lower Creekside LSIS site allocation amended to make reference to the emerging buildings and the changing character of the area at 1 Creekside.
Fifth State and (Avison Young obo)	3	LNA SA 16	<p><i>Summary</i></p> <p>The Owners and Developer of 5-9 Creekside are supportive of the draft allocation as a whole, however we request that PBSA is included within the proposed development uses. Notwithstanding this and based on our current assessment, we consider that the proposed indicative site capacity may be overly restrictive and so we question whether the allocation has been positively prepared in accordance with the requirements of the NPPF. We consider that the indicative site capacity is not supported by proportionate evidence and therefore does not seek to meet the area’s objectively assessed needs. Indeed the design work that is currently being prepared by Fifth State in conjunction with other landowners and development plots adjacent to 5-9 confirms that the overall capacity of Lower Creekside has potential to be higher than proposed in the policy wording.</p>	<p>Disagree as the SHMA has identified that Lewisham has already contributed a significant amount of student bed spaces and the greatest need in the Borough is for conventional housing.</p> <p>Our response on site capacity is set out above.</p>	No change.

			We would therefore suggest that the recommendations set out in these representations should be carefully considered and incorporated into the proposed policy wording in order for the allocation policy to be found sound.		
Artworks Creekside (Avison Young obo)	3	LNA SA 16	We note that Lower Creekside (Site Allocation 16) is incorrectly labelled as a Strategic Industrial Location in Figure 15.2. This should be amended to reflect the correct designation: Locally Significant Industrial Site.	Agree that this site is not SIL.	Local Plan Figure 15.2 amended to show site as LSIS.
Artworks Creekside (Avison Young obo)	3	LNA SA 16	<p>Comments on draft Site Allocation 16 (Lower Creekside Locally Significant Industrial Site)</p> <p>The following sections assess the soundness of the draft Site Allocation 16 in accordance with Paragraph 35 of the NPPF which states that a Local Plan should be positively prepared, justified, effective and consistent with national planning policy.</p> <p>Site Allocation (Indicative Development Capacity)</p> <p>Site Allocation 16 comprises a number of development sites along Lower Creekside, including 2 Creekside and 3 Creekside. The sites owned by Artworks Creekside and which fall within the Allocation are included in Appendix I.</p> <p>The Council identifies that the whole site allocation comprises 1.1 ha, and has an indicative capacity for 160 residential units and 8,201 sqm of employment floorspace. We note that the site allocation has reduced from the 255 residential units previously identified in the March 2020 draft Local Plan.</p> <p>The Site Allocation Background Paper (January 2021) which underpins the draft Local Plan identifies that the indicative capacities should not be read prescriptively, and the actual development capacity of a site will need to be established through detailed design. Indicative site capacities are based on either existing planning consents, pre-application stage proposals, masterplan studies or SHLAA density assumptions (taking account of sensitivity assumptions on heritage assets for example). On LSIS co-location sites, a general assumption of 33% employment floorspace and 67% residential uses is suggested. For the Lower Creekside LSIS, this ratio is 33% : 0% : 20% : 47% for employment : main town centre uses : other : residential uses. This has not been reflected in the Allocation.</p> <p>There is a clear inconsistency and the Council has no methodology for this ratio, nor does it appear to have been tested via any viability method or consider the re-provision of the public house. Whilst Artworks Creekside supports the principles of a co-located mixture of employment and residential uses, the indicative development capacity must include prior engagement with Artworks Creekside in order to demonstrate a viable redevelopment and therefore inform a viable and reasonable indicative development capacity.</p> <p>Furthermore, Appendix A of the Site Allocation Background Paper outlines that for Lower Creekside LSIS the standard method (SHLAA) plus sensitivity analysis was undertaken to establish the 160 residential unit capacity. Without the sensitivity analysis, a site within an Opportunity Area with a PTAL of 4-6 could accommodate up to 355 units (within an Urban location). The Council provides no explanation or methodology on how sensitivity analysis reduces a capacity.</p>	<p>Where no advanced pre-application has taken place, the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Site Allocations Background Paper.</p> <p>Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the scale of development resulting from the planning consent granted for the part of the site and current pre-application discussions as well as the need to protect the heritage setting of the site. Based on these considerations, the capacity has remained the same.</p> <p>Optimal capacity for the site will be established at planning application stage through a design led approach.</p>	No change.

			<p>Given that the development at 1 Creekside (LBL ref; DC/18/106708) was approved at a density of 350 units per hectare (with a site area of 0.1ha), the indicative development capacity of 160 residential units across the 1.1ha is significantly lower than what could reasonably be delivered through the redevelopment of Lower Creekside taking a design-led approach to site optimisation that reflects the Council’s earlier Policies.</p> <p>As such it is requested that the indicative development capacity is increased following engagement with Artworks Creekside that establishes the viable quantum of development for sites within the Allocation, or it is made clear that the figure provided is in no way a cap on development potential.</p>		
Artworks Creekside (Avison Young obo)	3 3	LNA SA 16 Para 15.88	<p>Site Allocation (paragraph 15.88)</p> <p>The site is allocated for comprehensive employment led redevelopment. Co-location of compatible residential and complementary uses are supported by Artworks Creekside within the current drafting. It is requested that ‘<i>compatible commercial</i>’ uses are clarified in the Site Allocation.</p>	Disagree, identifying specific commercial uses could limit the development potential of the site. Current wording provides flexibility.	No change.
Artworks Creekside (Avison Young obo)	3 3	LNA SA 16 Para 15.89	<p>Opportunities (paragraph 15.89)</p> <p>Artworks Creekside support the opportunities provided in draft paragraph 15.89, but also consider that reference to the site being located in the Deptford Creek / Greenwich Riverside Opportunity Area should also be acknowledged, as this is envisaged to provide new jobs and homes through the plan period.</p>	Agree.	Lower Creekside LSIS site allocation amended by referencing Deptford Creek / Greenwich Riverside Opportunity Area
Artworks Creekside (Avison Young obo)	3 3	LNA SA 16 Para 15.90	<p>Development requirements (paragraph 15.90)</p> <p>Artworks Creekside note the continued reference to ‘no net loss of industrial capacity’ and this should be removed as it no longer accords with the London Plan. The emerging development proposals seek to deliver new active frontages along Creekside which is also supported in this section of the allocation.</p> <p>As with the commentary to draft Policy LNA4, ‘<i>the new and improved public realm</i>’ should not necessarily be located adjacent to Creek, whilst waterside access and amenity space should not be an explicit necessity, but as an option that should be tested via a design-led process.</p>	<p>Disagree, as our local evidence suggests that there is a need to retain industrial floorspace on sites that are being redeveloped...</p> <p>Disagree, as it is considered that public realm should be located adjacent to the Creek in order to enhance waterfront access.</p>	No change.
Artworks Creekside (Avison Young obo)	3 3	LNA SA 16 Para 15.91	<p>Development guidelines (paragraph 15.91)</p> <p>We agree that non-employment uses, including residential uses, must be sensitively integrated into the development through considering operational requirements of future employment uses.</p> <p>Artworks Creekside will consider whether either sites are suitable to accommodate new workspace including artist studios and other SME accommodation, however we seek to retain the rights to prioritise these workspace over other viable employment uses.</p> <p>We understand that development will need to be consider the impacts on designated heritage assets and understand that any new developments should be designed having regard to the character and amenity of the Trinity Laban Centre, the Faircharm site, the buildings opposite the Creek in Greenwich, development at the former Tidemill School and the elevated DLR.</p>	Comments noted. Agree that the development at 1 Creekside should be acknowledged.	Lower Creekside LSIS site allocation amended to recognise the development at 1 Creekside when considering the context of this site.

			The recently commenced development at 1 Creekside (which forms part of the site allocation) must also be considered as part of the emerging character of the area. The development at 1 Creekside establishes a number of design principles which will inform the design approach for other sites within Site Allocation 16, including density, height and massing.		
Artworks Creekside (Avison Young obo)	3	LNA SA 16	Summary We are supportive of the draft allocation, however Artworks Creekside consider that the proposed indicative site capacity for residential units is significantly lower than what could be reasonable achieved across the Allocation and is unreasonable restrictive. It has not been supported by proportionate evidence and having worked with adjacent landowners, the overall residential capacity of Lower Creekside has potential to be higher than proposed in the policy wording. For those reasons, the Allocation is not justified.	Our response on site capacities is set out above.	No change.
Austringer Capital Ltd (Tetlow King Planning obo)	3 3	LEA Spatial Objectives Para 6.6	<i>Relates to Call for site</i> East Area spatial strategy 4.9 The provision of Green Infrastructure and open space is a central part of the emerging Local Plan’s strategy for the East Area of Lewisham: <ul style="list-style-type: none">• Paragraph 6.6 articulates the vision for the East area, stating that “<i>By 2040 the abundance of high quality parks and green spaces in the East area will make it a distinctive part of Lewisham.</i>”• Key Spatial Objective 8 seeks to “<i>Protect and enhance the linear network of open and green spaces, along with improving public access to them.</i>”• Key Spatial Objective 9 focuses on connectivity by active travel, seeking to “<i>Deliver a connected network of high quality walking and cycle routes that link open and green spaces, taking advantage of the Green Chain Walk</i>” and to “<i>Ensure these routes address existing barriers to movement, such as those caused by railways and major roads.</i>” 4.10 The Key Diagram identifies a Strategic Green Link running north-south through the area parallel to the railway, and passing alongside the former Willow Tree Riding Establishment site.	Comments noted.	No change.
GHL (Leegate) Limited (Frank Knight obo)	3	LEA 01	<i>Relates to Part 3, LEA SA 03</i> Part 3 – Neighbourhood and Places (Lewisham’s East Area) GHL welcomes the Council’s East Area and the Lee Green District Centre place principles, particularly the emphasis on delivering development to make the best use of land, including through the focused renewal of town centre and street sites. GHL also welcomes the Council’s intention to identify and allocate additional sites to meet the increased needs within the borough.	Support noted.	No change.
Austringer Capital Ltd (Tetlow King Planning obo)	3	LEA 01	<i>Relates to Call for site</i> 4.11 Policy LEA1 ‘East Area Place Principles’ gives effect to these objectives. Part J seeks the protection and enhancement of the network of Green Infrastructure	Comments noted.	No change.

			and part K seeks better walking and cycling connections including through Green Spaces.		
GHL (Leegate) Limited (Frank Knight obo)	- 3	General LEA SA 03	<p>Representations to Regulation 18 Main Issues and Preferred Approaches Consultation of the Lewisham Local Plan Review.</p> <p>On behalf of GHL (Leegate) Limited (hereinafter ‘GHL’), Knight Frank hereby submit representations in respect of the Regulation 18 Main Issues and Preferred Approaches Consultation of the Lewisham Local Plan Review, which runs from 15th January 2021 to 11th April 2021.</p> <p>It is understood that the London Borough of Lewisham (hereinafter ‘LBL’) commenced the Local Plan Review in late 2015, with a consultation on the main issues for the Plan and since then, have carried out various engagement exercises on studies and other documents to help inform the Plan’s preparation including the Lewisham Characterisation Study and Call for Sites exercise. These documents form part of the Local Plan evidence base.</p> <p>In addition to the Local Plan: Main Issues and Preferred Approaches Consultation, the Council are carrying out a further ‘Call for Sites’ exercise, to establish whether there are additional sites that are potentially available in the borough for development for housing, economic development and other uses. It is noted that GHL is not submitting any potential development sites for consideration through this process.</p> <p>GHL strongly supports the preparation of the Lewisham Local Plan Review and this letter provides responses to the Regulation 18 consultation.</p>	Comments noted.	No change.
GHL (Leegate) Limited (Frank Knight obo)	- 3	General LEA SA 03	<p>GHL (Leegate) Limited</p> <p>GHL has a major land interest within the borough through recently acquiring the Leegate Shopping Centre redevelopment site (hereinafter ‘the Site’), which will be affected by those policies and allocations contained within the Lewisham Local Plan Review.</p> <p>The Site is currently allocated under ref. SA23 (Leegate Centre) within the LBL Site Allocations Local Plan (2013) for “<i>mixed use retail-led with housing, offices and hotel</i>”. The timescales for the delivery of development on the Site is 2021-2026. An indicative housing capacity of 130 dwellings is stated. However, the principle of a greater quantum of residential has been established through a resolution to grant planning permission at the Site in 2016 (ref. DC/14/090032) and the draft emerging site allocation recognises that the current allocation is now out of date and insufficient to maximise the development potential of the Site.</p> <p>The Site has been the subject of on-going planning discussions for some time and the principles of regeneration and housing delivery have been supported by the LBL and the Greater London Authority (hereinafter ‘GLA’).</p> <p>Most notably, in 2016 LBL resolved to grant full planning permission, subject to the completion of a Section 106 Agreement for a retail-led, mixed-used development (including 229no. residential units and 36no. affordable housing units) on the Site (ref. DC/14/090032).</p>	The supplementary information is noted.	No change.

			<p>Subsequently, a revised application for an amended retail-led mixed-use proposal, which increased the quantum of residential to 393no. units, of which 64no. were affordable, was submitted to the LPA for consideration in June 2018 (ref. DC/18/107468). This application remains live pending formal decision. Furthermore, post-submission informal discussions between St Modwen, the LPA and the Mayor of Lewisham were undertaken in 2019 regarding potential for an enhanced scheme, with a greater number of units.</p> <p>Since acquiring the site, GHL has reviewed existing proposals to identify opportunities to optimise development proposals for a mixed use scheme that can support an increased affordable housing offer (35%) alongside other wider benefits. GHL is currently engaged in pre-application discussions with LBL, in parallel to on-going consultations with the local community and other stakeholders, regarding the comprehensive redevelopment of the Site.</p> <p>It is in this context that GHL submits this representation. GHL wishes to ensure that the new Lewisham Local Plan, which will shape the future of the borough and more specifically the regeneration of the Leegate Shopping Centre and Lee Green District Centre, is robust, flexible and capable of responding to future economic and demographic change.</p>		
GHL (Leegate) Limited (Frank Knight obo)	- 3	General LEA SA 03	<p>Main Issues and Preferred Approaches Consultation of the Lewisham Local Plan Review (Regulation 18)</p> <p>Paragraph 35 of the NPPF (which the Local Plan will be considered against) requires that any Plan submitted to the Secretary of State for Examination must be capable of being found both legally compliant and sound. This places various duties on the Council including, but not limited to, ensuring the Plan is:</p> <ul style="list-style-type: none"> • Positively prepared – seeking to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and is consistent with achieving sustainable development; • Justified – the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence; • Effective – deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and • Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework. <p>If the Local Plan fails to accord with any of the above requirements, it is incapable of complying with the NPPF, which as a result of Section 19 of the Planning and Compulsory Purchase Act 2004, is a legal requirement.</p>	Comments noted. Agree that the legislative changes need to be taken into account in the Local Plan.	Local plan amended to make consistent references to new use classes.
GHL (Leegate) Limited (Frank Knight obo)	- 3	General LEA SA 03	<p>It is acknowledged that a number of legislative changes were introduced by the Government during August and September 2020. This includes significant changes to the Use Class Order, which allows greater flexibility to change uses within town and district centres through three new broad use classes. We understand that the Council have not specified how these legislative changes will be addressed and how they will inform future stages of the Local Plan Review. As such, we believe further consideration is required, explaining the implications of the legislation changes to the proposed policies and site allocations contained within the Lewisham Local Plan Review.</p>	Agree that the Local Plan should align with the Use Classes that were updated in September 2020.	Local plan amended to make consistent references to new use classes.

GHL (Leegate) Limited (Frank Knight obo)	- 3	General LEA SA 03	Overall, GHL supports the preparation of the Local Plan Review, and this representation sets out a number of observations and recommendations intended to ensure it is capable of delivering the Council’s vision for the future regeneration of the Leegate Shopping Centre and Lee Green District Centre, in a rapidly changing economic climate.	Comments noted.	No change.
GHL (Leegate) Limited (Frank Knight obo)	- 3	General LEA SA 03	Conclusion The objectives and aspirations set out in the Lewisham Local Plan Review document form a sound basis to work from in the preparation of a new Local Plan. We therefore welcome the opportunity to make these representations at this early stage and look forward to working with the Council to progress the draft Plan, whilst also supporting the Council’s vision for the comprehensive regeneration of the Leegate Shopping Centre. Should you have any queries or require further information at this stage, please contact us.	Comments noted.	No change.
GHL (Leegate) Limited (Frank Knight obo)	3	LEA SA 03	<p>Site Allocation 3 - Leegate Shopping Centre</p> <p>GHL strongly supports the continued allocation of the Leegate Shopping Centre for comprehensive mixed-use redevelopment of the existing shopping centre, comprising compatible main town centre, commercial, community and residential uses. Indeed, the redevelopment of the previously developed site will perform a key role in regenerating this district centre whilst also meeting housing needs within the borough and ease pressure on unallocated sites. GHL supports the allocation within the Lewisham Local Plan Review, where an indicative development capacity of 450 residential units, 805sqm of employment floorspace and 5,449sqm of main town centre floorspace is identified.</p> <p>The NPPF Paragraph 117 promotes the effective and efficient use of land in meeting the need for new homes and other strategic uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. NPPF Paragraph 118 identifies that decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and that decisions should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.</p> <p>Given the Site’s District Centre location, it is considered that this Site should be considered for high density residential development, optimising the number of homes delivered in the urban area, in the most sustainable location. The Site and other site allocations in the area, can play a key role in achieving ambitious housing growth during the Plan period.</p> <p>Therefore, it is contended that the Council’s proposed indicative development capacity and aspirations on unit numbers, could potentially significantly underestimate the role that the Site could perform in meeting a variety of needs. We feel that there shouldn’t be an identified cap on unit numbers, other than recognition of high-density development delivered through high-quality design. Alternatively, we seek clarification on the Council’s aspiration and require a justification as to how the proposed development capacity has been set. It is</p>	<p>Support and comments noted. .</p> <p>Where pre-application discussions are likely to evolve, the council has used a previous application to determine indicative site capacities – more details can be found in the Site Allocations Background Paper.</p> <p>Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the scale of development considered suitable for the site, based on a previous application and the need to deliver non-residential floorspace appropriate to the District town centre. Based on these considerations, the capacity has remained the same.</p> <p>Optimal capacity for the site will be established at planning application stage through a design led approach.</p>	No change.

			<p>GHL's understanding that no technical feasibility studies have yet been undertaken by the Council to determine these indicative capacity figures.</p> <p>GHL supports the Government's aspiration for the effective and efficient use of highly sustainable previously developed sites and the role that increased densification of urban sites will perform in protecting settlements beyond the boundary. Indeed, as set out within the NPPF the Council should seek to achieve densities that take account of a range of factors. GHL encourages the Council to allow for greater densities within urban areas where appropriate, including within Lee Green District Centre.</p> <p>The quantum of uses should be defined through a design-led process, in collaboration with the LPA and GLA and should ultimately seek to effectively reuse and optimise previously developed land, and assist with the continued improvement, enhanced sustainability and long-term viability of the Lee Green District Centre. The precise number of units, mix of units type, size and affordability is therefore to be determined as part of a design-led exercise. This approach would be consistent with the London Plan Policy D3 (Optimising site capacity through the design-led approach) that requires all development to make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations.</p> <p>GHL is seeking to deliver increased residential units, which would make a significant contribution to the Council's housing and affordable housing targets and will also help to work towards achieving the national objective to provide 300,000 net housing additions each year in England.</p>		
GHL (Leegate) Limited (Frank Knight obo)	3	LEA SA 03	<p>Furthermore, the quantum of employment floorspace and main town centre floorspace needs to be reviewed in light of changes to shopping and potential future of the high street, in response to a post-COVID-19 world, resulting in Government's update to the Use Class Order, whilst ensuring the quantum of floorspace is provided to continue support of the vitality and viability of Lee Green District Centre.</p> <p>GHL assume that the identified quantum of employment and main town centre floorspace has been calculated by the in situ floorspace. However, clarification is sought by GHL as to what evidence the Council have used to inform the site allocation and whether assessment works been carried out to justify that such provisions are sustainable going forward.</p> <p>Furthermore, in light of the current challenges confronting the retail sector nationally, and within Lee Green District Centre more specifically, GHL strongly encourage the site allocation policy to allow sufficient flexibility to ensure that the wider centre area is attractive to potential retailers / occupiers, and do not result in empty and unlettable units. Indeed, it is concluded that the Lewisham Local Plan site allocation policy, must plan positively for those significant opportunities to ensure the vitality and viability of Lee Green District Centre is sustainable into the future.</p>	<p>Comments noted. Our response to site capacities is set out above.</p> <p>Agree that consideration should be given to changing town centres and retail in a post pandemic world.</p>	Local Plan amended to reflect the impact of the pandemic on town centres.
GHL (Leegate) Limited (Frank Knight obo)	3	LEA SA 03	It is therefore requested that the proposed site allocation is reviewed in the context of the latest proposals presented by GHL. In addition, we respectfully request that the site allocation is structured in a way that seeks the optimisation of site capacity through a design-led approach and that the housing target is	Development proposals must make best use of land and establish optimal capacities rather than	No change.

			expressed as a minimum to be achieved on site and also ensures that the quantum of employment and main town centre floorspace is appropriate and informed by evidence of need.	explicitly supporting higher density development. Recognition that site capacities are indicative and that optimal capacity for the site will be established at planning application stage through a design led approach is already included at the start of Part 3 of the Local Plan	
GHL (Leegate) Limited (Frank Knight obo)	3	LEA SA 03	GHL support the Council’s aspirations set out in the ‘development requirements’ and ‘development guidelines’ supporting paragraphs. Nevertheless, GHL re-emphasise that the proposed designation of the Primary Shopping Area is key and needs to be carefully drawn, to ensure that there is no conflict with the aspirations set in the proposed site allocation.	Support noted. Agree that the primary shopping area boundary should be amended.	Local Plan amended with a revised primary shopping area.
GHL (Leegate) Limited (Frank Knight obo)	3	LEA SA 03	The proposed timeframe for delivery of any redevelopment is between 2020/21 to 2024/25. Subject to pre-planning discussions, GHL are confident that the development can commence in this timeframe with potential scope to be completed as well.	Comments noted.	No change.
GHL (Leegate) Limited (Frank Knight obo)	3	LEA SA 03	In light of the above, we would welcome an opportunity to review the proposed site allocation for the Leegate Shopping Centre with the Council as part of the Lewisham Local Plan Review, and in consideration of the emerging proposals at the site.	Comments noted.	No change.
Austringer Capital Ltd (Tetlow King Planning obo)	3 3	LEA 04 LEA 05	<i>Relates to Call for site</i> Policies LEA4 ‘Linear Network of Green Infrastructure’ and LEA5 ‘East Lewisham Links’ offer further detailed policy guidance on how these objectives might be achieved. 4.12 Policies LEA4 and LEA5 clearly contemplate development coming forward that supports these broad aims. For example, part A of policy LEA4 requires that “ <i>Development proposals should respond positively to the linear network of green infrastructure as a vital environmental asset within the Borough and defining feature of the Blackheath, Lee and Grove Park neighbourhoods</i> ”. Part B sets out a series of criteria that developments should meet, and part C emphasises the role of effective management. 4.13 In this context, policies LEA4 and LEA5 rightly recognise the role of development and the benefits that it can deliver for the wider network of Green Infrastructure and active mode connectivity. This is a pragmatic approach that could secure meaningful improvements in respect of both issues. Yet other policies, particularly GI2 and its ‘no net loss’ requirement for open space, are more restrictive in their approach. 4.14 Overall, we consider the vision for the East Area is a positive one and is supported. It provides a policy framework that supports deliverable improvements to open space, Green Infrastructure and active travel links. In this	Specific redevelopment proposals to enable improvements to open spaces and help to achieve the vision for the East sub area will be considered on a site by site basis.	No change.

			context, we recommend that the Council gives careful consideration to the role that the Former Willow Tree Riding Establishment can play in achieving these objectives. A restrictive approach risks the continued degradation of the site with no clear opportunities to secure its effective management and maintenance. However, with a site allocation and careful consideration of the opportunities for open space and environmental enhancement, a meaningful improvement in the open space and connectivity of the site can be achieved.		
Transport for London Commercial Development	3	LEA SA 09	<p>Lewisham’s East Area: Site Allocation</p> <p>9 - Sainsbury Local and West of Grove Park Station</p> <p>Given TfL’s existing bus operations at Grove Park Bus Stand, TfL CD note the text in the development guidelines section which states that “<i>The bus garage is in operational use. Applicants should consult with Transport for London to investigate future options for the garage, including its continued use, which the site masterplan should address</i>”. The part of the site owned by TfL is used as a bus stand and not a bus garage. TfL CD would be open to discussing potential for development which includes this site; this would need to safeguard TfL’s operational function either as existing or as part of redevelopment of an accessible brownfield site, subject to meeting operational needs.</p> <p><i>LB Lewisham officer note: a map showing TFL’s landholdings in the vicinity of the Grove Park station site is included in the original representation.</i></p>	Agree.	Sainsbury Local and West of Grove Park Station site allocation amended by referencing a bus stand instead of a bus garage and continued operational function of the bus stand.
Stoken Properties Ltd (Boyer obo)	3	LSA Vision	<p><i>Relates to Call for site</i></p> <p><i>Lewisham’s South Area</i></p> <p>We are pleased to see that the Council has identified South Lewisham as a key area for regeneration and in particular are supportive of paragraph 17.7 which confirms that the “<i>regeneration of brownfield sites in Bell Green and Lower Sydenham will deliver a significant amount of new housing, including a high proportion of genuinely affordable housing, workspace and jobs, community facilities and open space. A new mixed-use neighbourhood will be created through the redevelopment of out-of-centre retail buildings, the former gasholders, industrial land around Stanton Way and other sites.</i>”</p> <p>It is encouraging and welcomed to see the Council realise the significant opportunity that the regeneration of brownfield sites in Bell Green and Lower Sydenham have in delivering high-quality, mixed-use neighbourhoods.</p> <p>A primary aim of planning policy is for development proposals to make the best and most efficient use of land. It is therefore welcomed and supported to see that the Council require development proposals to optimise the use of land and capacity of sites.</p> <p>In general we are supportive of the Council’s aim and vision for Lewisham’s South Area and provide comment on specific policies below.</p>	Support and comments noted.	No change.
Stoken Properties Ltd (Boyer obo)	3	LSA Vision	<p><i>Relates to Call for site</i></p> <p>Overall, we are supportive of the Council’s vision and ambitions for Lewisham’s South Area and the fact that they acknowledge the important role it will play in helping to deliver more inclusive and liveable neighbourhoods in the Borough.</p>	Support noted. Comments relating to stakeholder engagement in the masterplan are noted.	No change.

			<p>Whilst Lewisham’s South Area, and in particular Bell Green and Lower Sydenham, do have the potential to deliver a significant amount of growth over the plan period, it is encouraging to see that the Council understand that development may have to be phased and it may be the case that parts of some sites come forward in the first instance, which will facilitate the development of the wider site.</p> <p>Whilst we hope for clarity on the points raised above, we are generally in favour of the Council’s proposals and in particular the fact that the Council acknowledge that the Bell Green and Lower Sydenham area presents an excellent opportunity for the comprehensive redevelopment and regeneration of sites to deliver new high quality, mixed-use development.</p> <p>It is understood that the Council will be working with interested parties to prepare a masterplan for the regeneration of the Bell Green and Lower Sydenham area. As our client has an established interest in the area, owning part of the site identified as Stanton Square, we would be very interested in being involved in any future discussions concerning the masterplan and look forward to receiving details on how to become involved in this process in due course.</p>		
Tetra Tech Planning (John Lyon’s Charity obo)	3	LSA Vision	<p>Part Three – Lewisham’s Neighbourhoods: Chapter 17 - Lewisham’s South Area</p> <p>We respond to each of the questions in turn:</p> <p>How do you feel about the proposed vision for the (South) area?</p> <p>The Charity commends the Council for its bold and ambitious vision for the South Area, which provides a clear and detailed synopsis of how the Council envisage the area in 2040.</p> <p>Do you have any comments on the proposed vision?</p> <p>The Vision for any new Local Plan should be aspirational but also realistic. The proposed vision sets out an aspirational and positive approach to the regeneration and growth of the South area over the Local Plan period. We note that the Bakerloo Line extension is referred to in the Vision. Notwithstanding the Secretary of State’s safeguarding directions for the Bakerloo line in March 2021, the safeguarding directions only pertain to the first stage of the Bakerloo Line – from Elephant & Castle via Old Kent Road and New Cross Gate to Lewisham. TfL’s consultation on the Bakerloo Line extension in December 2019 sought “views” on potentially extending the line beyond Lewisham – to Hayes and Beckenham Junction, which could include a new station at Lower Sydenham; we would therefore reiterate that there is a need for pragmatism when discussing the Bakerloo Line, specifically Phase 2 and the development potential that it could offer to the South of the borough.</p> <p>The Vision refers to “a new mixed-use neighbourhood”, which will be created through “the redevelopment of out-of-centre retail buildings, the former gasholders, industrial land around Stanton Way and other sites” . The Bell Green Retail Park, and Trade City, and its associated surface car parking is a highly successful and popular destination in south-east London. The Vision correctly recognises the need for a Masterplan to guide these development proposals in</p>	Support and comments noted. Agree that there is a need to be pragmatic when referring to BLE and its development potential in south of the Borough	Local Plan amended to recognise that the BLE safeguarding direction relates only to the first stage of the Bakerloo Line – from Elephant & Castle via Old Kent Road and New Cross Gate to Lewisham and that Phase 2 in the south of the Borough should be considered pragmatic manner.

			<p>and around Bell Green and it is critical that this process starts in earnest as soon as possible with engagement from key stakeholders, including landowners, business owners and the local community.</p> <p>The Charity welcomes the creation of new homes, including genuinely affordable housing, the creation of new employment space and jobs, community facilities and green spaces, all of which are central to the success of mixed-use neighbourhoods.</p>		
Tetra Tech Planning (John Lyon’s Charity obo)	3	LSA Key Spatial Objectives	<p>Do you have any comments on the proposed key objectives?</p> <p>The 12 key objectives reflect the vision in a clear and robust manner, and they set out how the Local Authority will deal with the key issues.</p> <p>The Charity does however reiterate its comments made in relation to the BLE and the need for a high degree of pragmatism when discussing the objective to “secure the delivery the Bakerloo line extension”. The South Area falls within a potential Phase 2 of the BLE, which may not come forward during the Plan period, indeed, it may not come forward at all, however the overall designation as a “Strategic Area for Regeneration” alongside the local “Regeneration and Growth Nodes” should support and encourage transformative growth in the area regardless of Phase 2.</p> <p>The Charity welcomes and fully supports those tangible objectives which seek to “coordinate new investment in the Bell Green and Lower Sydenham area to enable it to become a London Plan Opportunity Area” ; and “deliver the regeneration of the former gasholders, Bell Green Retail Park and other sites nearby to create a new high quality residential-led mixed-use area that is well integrated with existing neighbourhoods and communities”.</p> <p>The future designation of an Opportunity Area within the London Plan is for the Mayor of London and the GLA, however the Charity does welcome and support the Council’s objective of coordinating new investment in the Bell Green and Lower Sydenham area to “enable” that to happen and would expect the highest levels of public engagement, with effective participation from key stakeholders, from the outset of the process.</p>	<p>The support for an Opportunity Area at Bell Green/Lower Sydenham is noted and agree that public engagement will be a necessary part of this process. The Council is a strong advocate of the BLE and the benefits that this will bring to Lewisham residents. However the planned growth within the Local Plan is not predicated on the delivery of the BLE.</p>	No change.
Tetra Tech Planning (John Lyon’s Charity obo)	3 3 3	LSA SA 01 LSA SA 03 LSA SA 04	<p>Site Allocations 1 (Former Bell Green Gas Holders), 3 (Bell Green Sainsbury’s) and 4 (Stanton Square) are adjacent to or within close proximity to Site Allocation 2 and this “Regeneration Node” will require an effective strategy to co-ordinate the significant regeneration in an effective manner.</p>	<p>Agree that the four site allocations will need effective co-ordination. All four site allocations already mention “that development must be delivered in accordance with an area framework/masterplan for Bell Green and Lower Sydenham.</p>	No change.
Tetra Tech Planning (John Lyon’s Charity obo)	- 3	General LSA	<p>Conclusions</p> <p>Overall, the Charity, as a key stakeholder in the South Area, is supportive of the aims and objectives of the Regulation 18 Local Plan. Plans should be prepared positively, in a way that is aspirational but deliverable. The Charity welcomes and supports the borough’s aspirational Local Plan, while recognising the pragmatism</p>	<p>Support noted.</p>	No change.

			needed in relation to the Bakerloo Line Extension. In accordance with the NPPF (paragraph 16c), the Charity endorses early and effective engagement with the Council to progress and shape the Plan prior to its Regulation 19 consultation.		
Phoenix Community Housing (BPTW obo)	- 3	General LSA	<p>I am writing on behalf of our client Phoenix Community Housing (PCH) to provide comments in response to the second Regulation 18 stage consultation document (<i>‘Main Issues and Preferred Approaches’</i>) for the emerging Local Plan 2020-2040. These comments follow our previous representations on behalf of PCH submitted at the first Regulation 18 stage consultation, back in November 2015.</p> <p>Introduction PCH are a not-for-profit, residential-led housing association who own and manage more than 6,000 homes in Lewisham. Their primary areas of operation are Bellingham, Whitefoot and Downham, all within the south Lewisham area. PCH therefore represent a key stakeholder within this part of the borough and have a keen interest in the emerging documentation relation to the draft Local Plan which will have a major impact on the future operations of the association. Having reviewed the documentation, we would like to make comments</p>	Comments noted.	No change.
Phoenix Community Housing (BPTW obo)	- 3	General LSA	<p>General Strategy The consolidation of LBL’s Core Strategy and various development plan documents into a single plan is welcomed. The delay since the previous Regulation 18 consultation in 2015 has been useful in enabling the Tier 1 New London Plan process to be completed ahead of advancing LBL’s Tier 2 plan, noting that Lewisham’s contribution to housing has been upped. This also enables the new Lewisham plan to respond to the contemporary matters of the climate crisis declared by the borough, the potentially permanent implications on patterns of living brought about by coronavirus, and to be consistent with the updated NPPF (2019), which placed a greater emphasis on making efficient use of land through sensitive intensification, brownfield sites and small sites. It is less fortunate, however, that since this consultation began TfL have put an indefinite hold on the Bakerloo line extension, casting doubt upon the deliverability of a fulcrum of all the spatial strategy options presented (and indeed the preferred approach) within the plan period.</p> <p>The extension is not cancelled, though, with Grant Shapps issuing safeguarding directions on the land proposed to be used for Stage 1 to Lewisham in order to ensure no other use of land will be permitted within the likely corridor. Making strategic allocations in this plan around future Bakerloo line stations could see major scale growth arrive before the required infrastructure. A more justifiable and effective strategy for this plan would be to focus strategic development around the short-medium term A21 Healthy Streets Corridor (‘Lewisham Spine’) initiative, existing public transport networks, and promoting to a greater extent sensitive intensification and regeneration in the more deprived areas of the borough. Deprivation in the south of the borough is being exacerbated by the pandemic as noted below and the Bakerloo Line extension would have assisted with regeneration and better employment options for the PCH community. Both need to recognised and addressed in planning.</p>	Comments noted. The planned growth within the Local Plan is not predicated solely on the delivery of the BLE and the A21 Healthy Streets Corridor and sensitive intensification form an important element of the spatial objectives for Lewisham’s south area. The vision also seeks to deliver improvements that address the causes of deprivation in the Borough’s south.	No change.
Phoenix Community Housing (BPTW obo)	- 3	General LSA	<p>I trust that the above comments will be taken into account as part of the continuing development of the Local Plan and would of course welcome any further engagement on the issues that have been discussed.</p> <p>Should you require any further clarification on the issues discussed in this letter, please do not hesitate to contact me</p>	Comments noted.	No change.
Southern Gas Networks (Carter Jonas obo)	- 3	General LSA SA 01	<p>LEWISHAM LOCAL PLAN TO 2040 – MAIN ISSUES AND PREFERRED APPROACH REGULATION 18 CONSULTATION – SOUTHERN GAS NETWORKS REPRESENTATIONS</p> <p>On behalf of our client, Southern Gas Networks (SGN), we enclose representations to the London Borough of Lewisham’s (‘the Council’) “Main</p>	Comments noted.	No change.

			<p>Issues and Preferred Approach” consultation on its emerging Local Plan to 2040. Our client is the sole, freehold owner of the Former Bell Green Gas Holders, Bell Green, SE26 4PX (hereafter known as ‘the Site’).</p> <p>The Site is included as a draft allocation in the emerging Local Plan (‘1: Former Bell Green Gas Holders) (details provided on Page 698-699). The Council have indicated that the Site has an indicative development capacity of 73-178 net residential units, alongside employment uses (782sqm) and main town centre uses (1,563sqm), with a timescale for delivery within the first 5 years of the plan (2020/21– 2024/25).</p> <p>Should you have any queries, please do not hesitate to contact Cater Jonas.</p>		
SGN (Quod obo)	- 3	General LSA SA 01	<p>Sydenham Gas Works</p> <p>London Borough of Lewisham: Regulation 18 Stage Local Plan “Main Issues and Preferred Approaches</p> <p>Representations on behalf of SGN</p> <p>Please find enclosed representations submitted on behalf of SGN. We would be grateful for confirmation of receipt of these representations.</p> <p>Please do not hesitate to contact me with any queries you may have in relation to the enclosed.</p>	Comments noted.	No change.
SGN (Quod obo)	- 3	General LSA SA 01	<p>1 Introduction</p> <p>1.1 Quod is instructed by Scotia Gas Network (SGN) to submit representations to Lewisham Council in respect of its Regulation 18 – Local Plan “Main Issues and Preferred Approaches”. These representations are submitted within the consultation period of 15th January to 11th April 2021.</p> <p>1.2 SGN supports the Council’s ambition for growth and renewal across the borough and particularly towards the Bell Green / Lower Sydenham area. SGN is the owner of the ‘Former Bell Green Gas Holders’ (the “gas works site”) – Site Allocation 1, and to which these representations are principally focussed towards.</p> <p>The Site</p> <p>1.3 SGN is the current owners of the 0.77-hectare gas works site allocated for redevelopment within the Regulation 18 draft Local Plan. The site previously contained two gas holder structures that were removed in 2019 following the grant of prior approval for their removal under application DC/18/107607, which was determined in July 2018.</p> <p>1.4 SGN has previously engaged with Lewisham Council in promotion of the site for redevelopment as part of the adopted Local Plan – Site Allocations (2013), which identified the gas works site as part of wider Site Allocation SA26 (2013 Site Allocation Local Plan) for the Former Bell Green Gasworks (Phases II & III), Sydenham, SE26, which extends across 9.7 hectares.</p> <p>1.5 The existing SA26 allocation comprises Phase 2: Mixed use business, industrial or warehouse, non-food retail units and associated garden centre, restaurant and retention of Livesey Memorial Hall as a social club; and Phase 3: Mixed use residential and retail. The site is adjacent to the Sainsbury's supermarket at Bell Green, which was developed as Phase 1.</p>	The supplementary information is noted.	No change.

			<p>1.6 In support of the adopted Local Plan’s ambition, the existing site allocation SA26 has been the subject of large levels of development with Phase 2 and Phase 3 of the allocation built out to deliver the Bell Green Retail Park (DC/11/78646) and Pear Tree Court (DC/09/72403). At the time of the Local Plan adoption in 2013, the Gasworks were considered to be operational gas holders, to which the Health and Safety Executive PADHI guidance applied and therefore restricted the site’s redevelopment as part of the adjacent Phase 2 and Phase 3 developments.</p> <p>1.7 The gas works continues to be the subject of a Hazardous Substance Consent. SGN will ensure that this is revoked prior to the site coming forward for development.</p> <p>1.8 In view of its undeveloped status, the redevelopment of the gas works site continues to be promoted through the Regulation 18 Local Plan under Site Allocation 1, for a comprehensive mixed-use development with an indicative capacity of up to 178 homes, and up to 1,563sqm of non-residential floorspace. SGN remains supportive of the redevelopment ambition for the gas works site albeit believes that the current indicative capacity fails to optimise the residential capacity of this site in line with the adopted London Plan and wish to engage with Lewisham Council as part of the emerging Local Plan to address this.</p> <p>1.9 SGN worked with the Mayor of London to inform the policies of the adopted London Plan. Policy H1 allocates gasworks sites as a strategic source of housing, and footnote 59 specifically recognises the challenges of bringing forward these sites for development.</p>		
SGN (Quod obo)	- 3	General LSA SA 01	<p>2 Gasworks Policy - Conformity with National Planning Policy Framework and the London Plan</p> <p>2.1 SGN welcomes the opportunity to contribute to the emerging Regulation 18 Local Plan, which shall guide development across Lewisham. The Sydenham Gas Holder site represents a key development site within the wider Lewisham South area.</p> <p>2.2 Within this section, we identify national policy and London Plan policies that specifically relate to the redevelopment of gas works sites and which will need to be taken into account by Lewisham Council in formulating their site-specific allocation to ensure a sound approach.</p> <p>2.3 National Policy¹ stipulates that plans and decisions should apply a presumption in favour of sustainable development.</p> <p>2.4 For plan-making this means that plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change.</p> <p>2.5 Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound.</p> <p>2.6 Plans are ‘<i>sound</i>’ if they are:</p>	The supplementary information is noted.	No change.

		<p>a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.</p> <p>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p> <p>d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.</p> <p>2.7 These tests of soundness will be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area.</p> <p>2.8 To meet the tests of soundness, the Regulation 18 Local Plan must remain in conformity with the London Plan and National Planning Policy. Below, we provide a detailed explanatory note of policy relevant to gasworks sites.</p> <p>National Planning Policy Framework</p> <p>2.9 The National Planning Policy Framework 2019 (“NPPF”) sets out the Government’s planning policies for England and how these are expected to be applied. It is an important material consideration when considering how to formulate and apply planning policy to planning decisions.</p> <p>2.10 The NPPF contains national policy on a range of topic areas including decision making, viability, affordable housing, design, open space, heritage, and the economy. The “<i>presumption in favour of sustainable development</i>” remains the central tenet of the NPPF.</p> <p>2.11 Significantly, the NPPF refers specifically to the need to deliver more homes, at a greater density, on brownfield land, especially on land that is contaminated.</p> <p>2.12 This is, in part, a reflection of the work that gas works companies have undertaken with Government to create a policy framework which supports and promotes the delivery of heavily contaminated sites for homes. This is important due to the ‘<i>Do Nothing</i>’ scenario which is a real consideration whereby the revenue generated by development is not sufficient to offset the abnormal costs. In such cases, the gas works site will remain in situ and underdeveloped, as has been evidenced across much of the UK.</p> <p>2.13 The Government’s objective of “<i>significantly boosting the supply of homes</i>” is a clear national policy objective as set out in the first paragraph of Chapter 5 of the NPPF, ‘<i>Delivering a Sufficient Supply of Homes</i>’.</p> <p>2.14 National policy requires strategic policy-making authorities to have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability,</p>		
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			<p>suitability and likely economic viability. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.</p> <p>2.15 Chapter 11 of the NPPF sets out policies for <i>'Making Effective Use of Land'</i>. Planning policies and decisions should promote the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or brownfield land.</p> <p>2.16 National policy sets out the Government's approach to brownfield contaminated land, giving <i>"substantial weight"</i> to its redevelopment and remediation at Paragraph 118 Part (c), which is set out below:- <i>"(c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land"</i></p> <p>2.17 It also promotes and supports the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing, where land supply is constrained, and available sites could be used more effectively.</p> <p>2.18 Chapter 11 considers the objective of achieving appropriate housing densities. The Government expects planning policies and decisions to support development that makes efficient use of land, taking into account viability. At Paragraph 123, national policy expects the optimal use of a site for housing. <i>"Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site".</i></p> <p>2.19 National planning policy promotes the redevelopment of gas works site for housing, at optimal densities affording substantial weight to the value of using suitable brownfield land for homes.</p>		
SGN (Quod obo)	- 3	General LSA SA 01	<p>London Plan</p> <p>2.20 The recently adopted London Plan (2021) carries significant weight due to its conformity with the NPPF and recent testing at the examination in public. Importantly specific consideration has been applied to gas works sites, and they are referenced throughout the Plan. The reason for this is that gas utility companies (including SGN) were able to work with the GLA to examine the evidence base behind the challenges of delivering gas works sites. The background evidence base, as well as the determination of live planning applications considered by the GLA has helped to inform these policies, which have been subject to extensive and detailed consultation, review and examination in public. They have been found sound and are now formally adopted.</p>	The supplementary information is noted.	No change.

		<p>2.21 Three principal issues informed the policy debate. We consider these below and in assessing these factors conclude that the development of gas works sites can be treated as an exceptional form of development within London.</p> <p>Are gas works sites subject to abnormal costs?</p> <p>2.22 The evidence base to the London Plan (2021) recognises that remediation costs of gas works sites are significant. The London Industrial Land Demand Study 2017 explicitly recognises the limitation of land contamination at gas works sites, its cost, and the requirement to incentivise development through higher land values. It confirms the following:</p> <p><i>“Land contamination can constrain the future of such land (e.g. for former gas holder sites): decontamination works are costly and can require the incentive of higher land values (e.g. from residential developments)”.</i></p> <p>2.23 The abnormal costs will be experienced at the very start of the project, which can also result in long lead in times as the environmental planning considerations are addressed (remediation, water sampling etc).</p> <p>2.24 Decontamination costs were considered at the Tower Hamlets Local Plan 2031 Examination in Public (September 2018). The Council’s evidence base to the examination included the Tower Hamlets Local Plan Viability Assessment 2018 Paragraph 7.17. This considered three Gasholder sites within its borough concluding that <i>“we have included an allowance of £3.2m/ha for the sites, based on our experience of the costs associated with decontamination of similar Gas Works sites in London”</i>. This is a conservative figure as it relates only to decontamination costs rather than other costs such as the need to relocate gas infrastructure on site to facilitate redevelopment; rationalise high pressure gas mains; the erection of new Pressure Reduction Stations; and the removal of gasholder structures on site. However, it remains a significant cost.</p> <p>2.25 Notwithstanding this, Tower Hamlet’s own viability evidence found that the three gas works sites could not deliver policy compliant levels of affordable housing (an average maximum reasonable affordable housing provision of 20% was evidenced across the three sites). To ensure deliverability for the purposes of the Local Plan Tower Hamlets found it necessary to identify lower levels of affordable housing (flexible tenure mix) or ensure policy flexibility through increased density and a flexible approach to housing mix to achieve a policy compliant level of affordable housing.</p> <p>Can gas works sites contribute strategically to the delivery of housing in the capital. If they can, should they be subject to affordable housing thresholds and review mechanisms which apply to industrial sites that are brought forward for housing?</p> <p>2.26 The London Plan categorises gas works sites as surplus utility sites, and these sites are identified as a strategic source of housing.</p> <p>2.27 Policy H1 <i>‘Increasing housing supply’</i> is the principal housing delivery policy of the London Plan (2021) and its purpose, as the policy name suggests is to increase housing supply across London. Part B(2) states that Boroughs should <i>“optimise the potential for housing delivery on all suitable and available</i></p>		
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		<p><i>brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity...”.</i></p> <p>2.28 The policy lists six strategic sources of housing capacity. Sub paragraph (d) is relevant to gas works sites and identifies them for redevelopment as a strategic source of housing: <i>“d) the redevelopment of surplus utilities and public sector owned sites.”</i></p> <p>2.29 Surplus utilities are distinguished from other categories of sites. For example, industrial sites planned for release under Policies E4, E5, E6 and E7 are a separate sub-category at Policy H1(b)(2)(f).</p> <p>2.30 Utilities sites are also considered in the Strategic Housing Land Availability Assessment 2017 (SHLAA) which forms part of the evidence base for the adopted London Plan (2021). The SHLAA confirms that <i>“surplus utilities sites”</i> have been retained within the 10-year housing target where they have been promoted for redevelopment unlike designated industrial sites.</p> <p>2.31 To incentivise and de-risk the delivery of surplus utilities sites, the London Plan (2021) exempts gas works sites from the London-wide affordable housing requirement (50%) applied to other industrial sites by Policy H4. Instead, it recognises that gas works sites will have a lower affordable threshold and exempts them from late-stage reviews, where challenges to delivery are evidenced.</p> <p>2.32 Footnote 59 of the new London Plan specifically sets out what tests surplus utility sites should undertake to demonstrate the challenges of delivery. Footnote 59 recognises the substantial costs of preparing surplus utilities sites for development. It therefore (inter alia) confirms that surplus utility sites can be subject to the 35% affordable housing fast track approach, conditional upon evidence being provided of extraordinary costs. <i>“It is recognised that some surplus utilities sites are subject to substantial decontamination, enabling and remediation costs. If it is robustly demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring a surplus utilities site forward for development, then a 35 percent affordable housing threshold could be applied, subject to detailed evidence, including viability evidence, being made available”.</i></p> <p>2.33 Gasworks sites are therefore capable of having a 35% threshold level of affordable housing applied and follow the Fastrack Route. The Mayor requires the demonstration of decontamination requirements, and that enabling, or remediation costs must be incurred to bring surplus utility sites forward for development.</p> <p>2.34 In accordance with the approach taken across London to date, evidence will be submitted to demonstrate substantial decontamination, enabling and remediation costs during the pre-application process.</p> <p>Can gas works sites viably contribute towards London’s industrial floorspace capacity?</p>		
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			<p>2.35 The challenges of delivery of gas works sites are reflected in the economic policies of the London Plan.</p> <p>2.36 Supporting text to Policy E4 (Land for Industry, Logistics and Services to Support London’s Economic Function) previously confirmed that the principle of no net loss of industrial floorspace capacity does not apply to sites previously used for utilities infrastructure which are no longer required e.g., surplus utility sites, because of their delivery challenges. <i>“The principle of no net loss of floorspace capacity does not apply to sites used for utilities infrastructure or land for transport functions which are no longer required”.</i></p> <p>2.37 As a result of the Secretary of State’s decision to direct the Mayor to remove Policy E4(C) which sought, in overall terms across London, no net loss of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS, the supporting text to this policy has also been deleted (former paragraph 6.46-6.4.11).</p> <p>2.38 Paragraph 6.4.8 was also removed due to the blanket approach. The London Plan objective that gas works should not provide industrial capacity was however a principle tested at through the local plan review and remains an accepted policy principle.</p> <p>Summary 2.39 The London Plan allocates gas works sites as a strategic sources of housing supply. The London SHLAA relies upon such sites for its 10-year housing target. Gas works sites are considered separately from industrial sites. The challenges of delivery result in their exceptional consideration within the Plan. They are expected to deliver a lower threshold of affordable housing, exempt from a late-stage review mechanism, and the economic policies of the Plan recognise that gas works should not provide industrial floorspace.</p> <p>2.40 SGN would welcome working with the Council to ensure that the Reg 18 Local Plan reflects these specific policy requirements - in particular, London Plan Policies H1 and E4, and Footnote 59 of the London Plan should be explicitly referenced.</p>		
SGN (Quod obo)	- 3	General LSA SA 01	<p>5 Lewisham Local Plan – Regulation 18 – Other Planning Policies</p> <p>5.1 The following section considers the draft policies of the Regulation 18 Local Plan and its supplementary text. It is requested that the following commentary is read collectively.</p> <p>5.2 Our commentary is tailored to the policies that we consider as directly relevant to Site Allocation 1 - Former Bell Green Gas Holders, and its future redevelopment. It should not therefore be assumed that where our representations are silent on certain policies that SGN are supportive.</p> <p>5.3 Quod on behalf of SGN, therefore reserve the right to make further comments on any draft policies not commented upon as part of these representation, either as a supplementary submission or as part of any future consultation of the Lewisham Local Plan.</p>	Comments noted.	No change.

SGN (Quod obo)	3	LSA SA 01	<p>6 Conclusion</p> <p>6.1 In conclusion, SGN are encouraged by the emerging policies of the Regulation 18 Local Plan and welcome the continued allocation of the Sydenham Gas Works site for a mixed-use development as part of the wider regeneration of South Lewisham.</p> <p>6.2 SGN remain concerned that the indicative capacities of the site allocation underutilise the site and not reflect its development potential, and the development necessary to bring this site forward for housing. This is contrary to the London Plan, which identified surplus utilities sites as ‘<i>strategic sources of housing</i>’. The site should be optimised to deliver up to 300 new homes. The current under-optimisation also undermines the strategic regeneration objectives of the Local Plan in promoting the Bell Green/Lower Sydenham Opportunity Area.</p> <p>6.3 To bring forward the site for redevelopment in accordance with the site allocation, suitable allowance for the significant decontamination costs associated with redeveloping gas work sites should be included.</p> <p>6.4 SGN are supportive of Lewisham’s policy objective to deliver 35% affordable housing for all major development, however, to achieve this level, the gas works site should be allocated as an appropriate location for tall buildings. The justification for tall buildings is partly driven by viability but is further supported by: 1) the strategic ambition to promote Bell Green and Lower Sydenham as a new Opportunity Area, which the London Plan supports as an appropriate local for higher density development to optimise development capacities; 2) identification of adjacent site allocations as being appropriate for tall buildings, and 3) acknowledgement that the former gas holder structures which previously rose to a height of 35m in height acted as local landmarks for the area.</p> <p>6.5 SGN would welcome the opportunity for further engagement with Lewisham Council in respect of the Reg 18 Local Plan, and its future iterations.</p> <p>6.6 On behalf of SGN, Quod reserves the right to add to or amend these representations. This may be required where the Council issues new guidance or there is a change in policy at a local, regional or national level, or circumstances affecting the Sydenham gas works site.</p>	<p>Support and comments noted.</p> <p>Where pre-application discussions are likely to evolve, the council has used a SHLAA method to determine indicative site capacities – more details can be found in the Site Allocations Background Paper.</p> <p>Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the scale of development considered suitable for the site, taking into account the need to preserve the setting of the Livesey Memorial Hall, the need to retain the bowling green and tennis courts as open space and the need to deliver a revised land use mix more suited to the site’s location. Based on these considerations, the capacity has been amended.</p> <p>Optimal capacity for the site will be established at planning application stage through a design led approach.</p> <p>Following the Regulation 18 public consultation, additional work has been undertaken on the Lewisham Tall Buildings Study which will inform amendments to the Local Plan.</p>	<p>Former Bell Green Gas Holders and Livesey Memorial Hall site allocation amended to increase residential capacity to 100 units (baseline scenario). Should the Bell Green area become an Opportunity Area, the residential capacity could increase u to 442 units. Employment floorspace has reduced to 465m² and main town centre uses have increased to 1,859m².</p>
LaSalle Investment	3	LSA 01	<p><i>Relates to Part 3, LSA SA 10</i></p> <p>Part Three: Lewisham’s South Area</p>	<p>Support noted. Our response to site capacity is set out above.</p>	<p>No change.</p>

Management (Savills obo)			<p>LSA1 South Area place principles</p> <p>LSIM supports the principles for redevelopment of Lewisham’s South Area including the direction of new high quality housing and town centre uses to the A21 Corridor (Bromley Road).</p> <p>Whilst the Policy refers to the sensitive intensification of sites to deliver new high quality housing, LSIM would advocate that the Council captures greater potential the optimisation of such sites which will necessarily include encouraging an increase in heights and densities.</p>	<p>Following the Regulation 18 public consultation, additional work has been undertaken on the Lewisham Tall Buildings Study which will inform amendments to the Local Plan.</p>	
SGN (Quod obo)	3	LSA 01	<p><i>Relates to Part 3, LSA SA 01</i></p> <p>Lewisham South Area LSA1 (Chapter 17)</p> <p>4.36 Paragraph 17.4 states that there are “<i>two former gas holders, which are prominent landmarks</i>”. The gas holders have now been demolished and this text should be updated. The reference to the site representing a local landmark is however welcomed and we concur that the site should continue to be used as a wayfinding marker through delivery of tall buildings on the site.</p> <p>4.37 Paragraph 17.8 outlines the expectation that by 2040, a new neighbourhood at Bell Green retail park will be led through the masterplan, which will change the character of the area and create a new place through delivery of a new town centre and mixed-use residential developments. In achieving this, development at higher density at an urban scale that optimises the use of available land will be supported.</p> <p>4.38 The Reg 18 Plan allocated a number of sites for development across Lewisham South Area which spans Bell Green, part of Lower Sydenham, Bellingham and Downham. The South Area (land around Grove Park station) is identified as a Strategic Area for Regeneration (LSA2), which will be the focus of public and private investment to deliver regeneration in collaboration with local community.</p> <p>4.39 Contained within the Strategic Area for Regeneration is Bell Green and Lower Sydenham to which the Reg 18 Local Plan outlines the overarching ambition for this area to be designated as an Opportunity Area (LSA3) within a future review of the London Plan. The supplementary text for LSA3 outlines that development proposals within the Bell Green and Lower Sydenham area shall be guided by a Supplementary Planning Document or Masterplan.</p> <p>4.40 The vision for the Bell Green retail park and allocation of Bell Green and Lower Sydenham as a future Opportunity Area is fully supported by SGN. However, the existing site allocation for the gas works site, in a prominent location to the entrance of the new neighbourhood does not sufficiently optimise the site potential, and its site allocation should be reviewed to support higher density development at an urban scale. The need to replace the landmarks of the gasholders to help wayfinding of the new settlement should also allow tall buildings to be delivered on the site.</p> <p>4.41 In view of the above, Policy LSA1 should be updated as follows: <i>A. Development proposals must make the best use of land in helping to facilitate Good Growth and focussed regeneration, particularly to tackle inequalities and</i></p>	<p>Agree that the text on the gas holders needs updating and the point regarding urban scale. Support for Opportunity Area noted. Tall buildings</p>	<p>Local Plan updated to state that the gas holders have been demolished and using the wording proposed.</p>

			<p><i>the environmental, economic and social barriers that contribute to deprivation locally. This will require that investment is appropriately coordinated within Lewisham’s South Area and that:</i></p> <p><i>The out-of-centre Retail Park, former Gas Works and other sites at Bell Green and Lower Sydenham are comprehensively redeveloped at a higher urban density to create a new high quality residential, mixed-use quarter that is well-integrated with its surrounding area.</i></p>		
Tetra Tech Planning (John Lyon’s Charity obo)	3	LSA 01	<p>Do you have any comments on the proposed approaches for the area?</p> <p>LSA1: South Area Principles</p> <p>The 14 principles provide a very detailed list, setting out specific economic, social and environmental principles, which are welcomed. The principles reflect the London Plan’s (2021) ‘Good Growth strategy’ in seeking to make the best use of land and the Charity welcomes those specific principles which recognise the importance of delivering affordable housing and supporting inclusive and mixed communities.</p> <p>The comprehensive redevelopment of the out-of-centre Retail Park, former Gas Works and other sites at Bell Green and Lower Sydenham is strongly supported. The Charity notes Principle A(f), “Land is safeguarded to secure the delivery of strategic transport infrastructure, including the Bakerloo line extension south to Hayes”. The Charity is supportive of the Council’s positive planning; however it does advocate a cautious approach to safeguarding land which may not come forward within the Plan period.</p>	Support noted. Agree that a cautious approach is needed.	Local Plan amended to recognise that the Phase 2 of BLE may not come forward within the Plan period and that development potential of the area should not be solely predicated on it.
Phoenix Community Housing (BPTW obo)	3	LSA 02	<p>Lewisham’s Neighbourhoods and Places</p> <p>It is pleasing that the various neighbourhood boundaries are viewed as having a degree of overlap with each other, reflecting that communities define themselves around different spatio-functionalities and contexts. We would interpret the indicative capacity figures for each area of the borough being equally fluid. The division of the borough into five areas is a good way of recognising their starkly contrasting contexts, ranging from Deptford riverside to the garden-principled southern estates. The context and character description of South Lewisham is informative and accurate, and we view this as a sufficient acknowledgement of its heritage and prevailing urban form within a Local Plan document, without the need for designating any parts of it as Areas of Special Local Character. As aforementioned, such a designation in Bellingham or Downham would detract from the potential for ‘sensitive intensification’ in these areas, lessening the effectiveness of the spatial strategy for South Lewisham.</p> <p>Along with North Lewisham (which benefits from an Opportunity Area designation in the New London Plan), the Indices of Multiple Deprivation map identifies South Lewisham in general as the most deprived area of the Borough; save for isolated wards in Catford and Ladywell. Our previous representations expressed strong concerns with the proposed removal of the Local Regeneration Area category in the current Core Strategy which focused on South Lewisham. Therefore we are delighted to see, and wholly support, the re-instatement of a Strategic Area for Regeneration covering all of South Lewisham under policy LSA2. This policy objective will support the regeneration of these areas where this is significant need and potential to deliver much needed affordable and</p>	Support and comments noted. Both LSA2 and LSA4 acknowledge the importance of walking and cycling, as well as the use of public transport. Agree that LSA2 Ca should also recognise the A21 Healthy Streets initiative.	Local Plan amended to acknowledge the A21 Healthy Streets initiative as being as being a significant infrastructure project over the Plan period, in addition to the BLE.

			sheltered housing stock. It will be vital to meeting strategic objectives, and its necessity has only been exacerbated by the higher housing targets set by the New London Plan and the delayed growth-concentration opportunities around the future Bakerloo line extension in the western end of South Lewisham. Sensitive intensification and regeneration will be of utmost importance to this plan period and South Lewisham is primed for it. To that end we would argue that item C(c) of the policy, which seeks incremental but transformational improvement in the quality of housing and living environments, will be the most important and most effective tool in South Lewisham. Further, it would be justified to replace item C(a) – which concerns the Bakerloo line extension – with one that highlights the A21 Bromley Road and Ringway Corridor Healthy Streets initiatives as being the most significant infrastructure projects over this plan period, and directing new development here. We will be commenting separately on the A21 Design Guidance SPD, but support the inclusion of policy LSA4 and its link with policy TR3 (healthy streets). The draft text should more explicitly require provision for walking, cycle, and bus routes as public/active transport along this corridor will be key to unlocking sustainable development in the central area of South Lewisham.		
L&Q Group	3	LSA 02	<i>Relates to Call for site</i> 4.9 South Character Area L&Q is supportive of the designation of the South Character Area as a ‘Strategic Area for Regeneration’ and the publication of further planning SPDs relating to the Bell Green and Lower Sydenham Area Masterplan and Small Sites Guidance.	Support noted.	No change.
Albacore Meeting Room Trust (Lichfields obo)	3	LSA 02	<i>Relates to Call for site</i> (Part 2) Related Policy Areas (a) Lewisham’s South Area: (LSA2) Strategic Area for Regeneration The Trust supports the designation of the ‘South Area’ of the borough, which includes the site at Beckenham Hill Road, as a strategic area for regeneration under Policy LSA2. It is noted that the policy includes ambition to tackle inequalities in the Borough via the contributing environmental, economic and social barriers. This includes though supporting development proposals that seek opportunities to plan positively for social infrastructure that meets meet local needs, particularly community facilities and services catered to children and young people as well as those that remove barrier to movement across the Borough. Removing the Brethren Meeting Hall site from the MOL and allocating it for redevelopment to provide a new flexible community use building would assist and align with this policy aim. For example, the Citygate Church application proposes to make the auditorium available for the adjacent school to use for large events that it cannot accommodate within their own premises. The positioning of the site between the school and school playing fields represents an opportunity for the redevelopment of this site for replacement Community Use development, to incorporate a better access through the site to benefit young people.	Support noted. The comments regarding the site’s development contributing to this policy are noted. The Council is undertaken a comprehensive review of all existing MOL and is not proposing to de-designate any.	No change.

			As set out above, allocating the land for redevelopment would create the opportunity to enhance the environmental value and accessibility of the site, which is currently predominantly hard standing and private.		
Stoken Properties Ltd (Boyer obo)	3	LSA 02	<p><i>Relates to Call for site</i></p> <p><i>Response to Draft Policy LSA2 (Strategic Area for Regeneration)</i></p> <p>It is encouraging to see the Council recognise the need for the regeneration of this part of the Borough. We are pleased to see that the Council intend to pursue a partnership approach in order to ensure that public and private sector investment is secured within this area so that investment can be coordinated to successfully deliver regeneration in collaboration with local communities.</p> <p>The Policy advises that regeneration should be facilitated through a variety of approaches including the comprehensive redevelopment of strategic sites and renewal of town centres and employment locations. We are supportive of this approach and emphasise the important role that employment locations and their successful redevelopment can have for an area. A successful redevelopment of an employment area with commercial and residential uses can bring substantial and important benefits to both the local area and Borough as a whole by bringing an underutilised or vacant site back into a viable use.</p> <p>Redevelopment of such sites can result in the creation of more jobs in the Borough by making a more appropriate and efficient use of employment floorspace and the residential element will help the Council meet housing targets as well as bringing more inward investment for the Borough. Given the changing nature of the workplace and more people now working from home, it is important to acknowledge that traditional employment space is changing. It is now not uncommon for resident “work hubs” to form part of the commercial/employment offering in mixed-use development. We would encourage the Council to recognise changing working practices and to take a pragmatic view on these when deciding policy and any subsequent planning applications.</p>	Support and comments noted. The changing nature of working practices resulting in the restructuring some employment sites that are more suited to mixed use developments (including some at Lower Sydenham/ Bell Green) have been identified in the Local Plan.	No change.
Tetra Tech Planning (John Lyon’s Charity obo)	3	LSA 02	<p>LSA2: Strategic Area for Regeneration</p> <p>The Charity firmly supports the designation of a “Strategic Area for Regeneration” for the Southern area of the Local Plan. Notwithstanding the importance of the BLE and its potential delivery from Lewisham southwards, the Charity welcomes the Council’s recognition of the need for development to enhance provision of and access to bus services and the network of walking and cycle routes, which will help connect communities.</p> <p>The Charity endorses the Council’s commitment to working in partnership with key stakeholders, the comprehensive redevelopment of strategic sites and the sensitive intensification of sites and residential neighbourhoods to improve the quality of housing and living environment.</p>	Support noted.	No change.
Next Plc (Q+A Planning Ltd obo)	3	LSA 03	<p><i>Relates to Part 3, LSA SA 02</i></p> <p>7. On this basis our client is concerned to note that the new Local Plan appears to propose the redevelopment of the site. Policy LSA3 C (b) refers to the Council’s aim to ‘<i>deliver the comprehensive redevelopment of strategic sites in accordance with site allocation policies, including the ... Bell Green Retail Park</i> ‘; while</p>	Objection to the redevelopment of the Bell Green Retail Park is noted.	No change.

			<p>Allocation 2 specifically identifies the Park as a redevelopment location for <i>‘Comprehensive mixed-use redevelopment of the existing out-of-centre retail park with compatible residential, commercial, main town centre and community uses’</i>.</p> <p>8. We accept that, according to LSA3 B, there is still further work to undertake on this proposal, since it is the Council’s intention to <i>‘prepare a Supplementary Planning Document and/ or Masterplan...’</i>, which will <i>‘..complement the Local Plan in setting a long-term development and investment framework for the area.’</i> Nevertheless, the general intent to secure redevelopment of the Park is made very clear in the emerging Local Plan.</p>		
Stoken Properties Ltd (Boyer obo)	3	LSA 03	<p><i>Relates to Call for site</i></p> <p><i>Response to Draft Policy LSA3 (Bell Green and Lower Sydenham)</i></p> <p>We generally support the policy objectives of Policy LSA3, which seeks to promote the growth and regeneration of Bell Green and Lower Sydenham.</p> <p>Whilst we are in general agreement with criterion c. of Part C of the Policy which seeks to protect the employment function of the LSIS and are encouraged to see that “other compatible uses” are acceptable in these areas, we feel that this should be expanded to make specific reference to residential development.</p> <p>Mixed-use development comprising commercial at ground with residential above is a well established principle of planning and such developments have been successful, and are prominent, throughout London. The residential element of such schemes can complement and facilitate the commercial element and can bring significant planning benefits such as increasing the Borough’s housing supply.</p> <p><i>Policy Wording</i> We set out below our response to specific parts of the policy and how the policy should be worded. For consistency, throughout this letter, anything underlined is our proposed wording to the policy.</p> <p>Part D, criterion c. of the Policy states: <i>c. Protect the employment function of the Locally Significant Industrial Sites at Stanton Square and Worsley Bridge Road, whilst seeking to deliver new high quality workspace, taking into account opportunities for the co-location of employment and other compatible uses;</i></p> <p>We suggest that the criteria is expanded to make specific mention of residential use and reads “...<i>taking into account opportunities for the co-location of employment and other compatible uses <u>including residential where this is in agreement with other relevant Local Plan policies;</u></i>”. This inclusion provides certainty that a residential element would be considered acceptable provided it meets with other policies in the Plan and would not result in an overall negative impact on the economic functioning of the LSIS.</p>	Agree that the Local Plan should be amended to include residential use.	Local Plan amended to reflect proposed wording.
Kier Property (Carter Jonas obo)	3	LSA 03	<p><i>Relates to Call for site</i></p> <p>Lewisham South Area 3 – Bell Green and Lower Sydenham</p>	The comments regarding the redevelopment of Bell Green contributing to this policy are noted.	No change.

			<p><i>Good Growth</i> is a key thread throughout the recently published London Plan and Lewisham is set to play an important role in achieving this key objective. There is no doubt that Lewisham South Area 3 (LSA3) can contribute towards achieving this.</p> <p>LSA3 comprises a number of site allocations to facilitate development in the Bell Green area. Our client’s land should be incorporated as part of these site allocations as a result of its central location at the entrance of Bell Green Retail Park. The principle of development on the site should be supported by virtue of its brownfield nature. It can contribute towards the aims for LSA3 to be brought forward early in the plan process as indicated in the information table provided for the allocations, with the earliest timeframe for delivery in 2020/21-2024/25. The inclusion of our client’s land will help facilitate cohesive development.</p>		
Tetra Tech Planning (John Lyon’s Charity obo)	3	LSA 03	<p>LSA3: Bell Green and Lower Sydenham</p> <p>The Charity strongly supports the Council’s commitment to enabling the designation of an Opportunity Area at Bell Green and Lower Sydenham in a future review of the London Plan.</p> <p>The Charity strongly supports the preparation of a Supplementary Planning Document and/or Masterplan for the Bell Green and Lower Sydenham area. Noting that this is document is listed within the evidence base in LSA1 South Area Principle N(c), and which states that “development proposals should have regard to and positively engage” with this document, it is imperative that the Council start the masterplanning process sooner rather than later and engage with key stakeholders, including landowners, business owners, developers and local communities to ensure a collaborative and joined-up process from the start.</p> <p>Part C(a) of Policy LSA3 states that development proposals will be required to “safeguard the land required to secure the delivery of the Bakerloo line extension south to Hayes”. Three potential BLE Phase 2 stations have been highlighted in the Borough: “Ladywell, Catford and Lower Sydenham”, however no formal consultation has been undertaken on these locations. Notwithstanding, clarification should be provided within the Local Plan as to the (provisional) extent of land required for BLE Phase 2; and it should be confirmed if this land should be safeguarded as set out in Policy TR2 (Part C), or whether the safeguarded land will extend further than the required 400m.</p> <p>The Charity understands the importance of comprehensive redevelopment of strategic sites. Those strategic sites could have a number of landowners and leaseholders therefore clear lines of communication should be developed now with all interested parties; and workshops set up to ensure that the comprehensive redevelopment of strategic sites is a realistic and achievable objective for the Council.</p> <p>The Charity supports the Council’s consideration of the designation of a new town centre in the Bell Green and Lower Sydenham area. The area is subject to a significant level of proposed regeneration, with a broad mix of uses proposed, including housing, commercial, leisure and community facilities, which could provide a significant opportunity to create a vibrant and diverse new centre</p>	<p>Support noted, including for a new town centre at Lower Sydenham/Bell Green. The comment that the masterplan should engage with key stakeholders at the earliest opportunity is noted.</p> <p>Agree that the provisional extent of the land required for BLE Phase 2 and stations should be identified in the Local Plan.</p>	<p>Local Plan amended to identify provisional extent of land required for BLE Phase 2 and stations.</p>

			<p>which can respond in a more holistic manner to the changing and challenging conditions that existing town centres are experiencing.</p> <p>The Local Plan states that “The centre’s role and function (i.e. position within the Borough’s town centre hierarchy) will be established having regard to further detailed assessments and public consultation”. The Charity welcomes and supports public consultation at the earliest opportunity.</p>		
LaSalle Investment Management (Savills obo)	3	LSA 04	<p><i>Relates to Part 3, LSA SA 10</i></p> <p>LSA4 A21 Corridor / Bromley Road</p> <p>LSIM supports the proposals for the transformation of the A21 corridor by making best use of land to deliver high quality, mixed use residential developments.</p> <p>It is noted that the Policy states that development proposals will need to have regard to the A21 Design Guidance SPD which is still yet to be formally published. It is recommended that reference to such a specific document is removed from the wording of the Local Plan to account for the fact that this may not be delivered or replaced by materially different guidance during the plan period.</p>	Support is noted. Disagree as following Regulation 18 consultation, the A21 Development Framework has been endorsed by the council and forms a material consideration to be taken into account when planning for the redevelopment of sites in the A21 corridor.	Local Plan amended to update that the A21 Development Framework has been endorsed by the Council.
HHGL Ltd (G R Planning Consultancy Ltd obo)	3 3 3	LSA 04 LSA SA 10 Para 17.54-17.55	<p>In relation to the Draft Plan, we note that Policy LSA4 and Site Allocation 10 identifies Homebase as part of an opportunity site for a residential led mixed-use scheme with an indicative capacity for 141 residential units and 5,694 square metres of main town centre uses.</p> <p>The latter is not defined in detail, but the supporting text at paragraphs 17.54 – 17.55 suggests that a wider range of uses will be sought with a mixture of “<i>compatible main town centre, commercial and community uses.</i>” Other than the heading, there is no reference whatsoever to the existing Homebase or the important comparison role it performs in Catford or the large number of local jobs that the store supports, both directly and indirectly. There is also no reference to the implications of the proposed allocation for the future of the Homebase business. The clear inference of the proposed allocation is that Homebase would be forced to close.</p> <p>My clients consider that a planning policy/allocation which would precipitate the closure of its Catford Homebase would be contrary to national policy and specifically paragraph 80 of the National Planning Policy Framework (February 2019) (Framework). This states that planning policies should assist in creating the conditions in which businesses, such as Homebase, can invest, expand and adapt, as well as requiring significant weight to be placed on the need to support economic growth and local business needs.</p> <p>My client’s wish to remain on their Beckenham Hill Road site as this is a well-established retail destination and comprises a store that meets their business requirements. As currently worded, they would, therefore, strongly object to Policy LSA4 in so far as it applies to the opportunity sites and Site Allocation 10.</p> <p>We would, of course, be happy to discuss with the Council changes to the policy/allocation that provided the option for my clients to remain on site (the status quo), to be incorporated within any viable redevelopment scheme or to be relocated to a site that was allocated for this purpose in the Draft Plan. Both the</p>	Agree that current retail use should be retained, where possible. The site capacity allow for the re-provision of main town centre floorspace, although this is a matter for the landowner to consider, in consultation with leaseholders.	Homebase/Argos site allocation amended to reference re-provision of existing retail use providing other objectives for redeveloping the site (such as improved layout, walking, cycling, landscaping and alternative use of the surface car park) can be achieved.

			<p>latter two options would be on the proviso that the allocation confirms that any redevelopment or relocation must meet Homebase’s business, operational and customer requirements, and involve a development that was commercially viable.</p> <p>In the absence of any such options, as I confirmed, my clients will be left with no other way forward than to formally object to the Proposed Submission version of the Draft Plan and to pursue those objections at the Examination stage. My clients are keen to avoid the latter and their preference is to engage with the Council over its draft proposals and to discuss with Planning Officers changes to the Proposed Submission version of the Plan that would address Homebase’s significant concerns with the plan as drafted.</p>		
Southern Gas Networks (Carter Jonas obo)	3	LSA SA 01	SGN strongly support the decision of the Council to allocate the Site for development but their preference is for it to be fully residential. We consider this Site provides a fantastic opportunity to deliver much-needed housing in the Borough on an otherwise vacant and disused site.	Comment noted. The site allocation provides for a mixed use development which is replicated across the whole of the Bell Green masterplan area in order to create a new, sustainable neighbourhood.	No change.
Southern Gas Networks (Carter Jonas obo)	3	LSA SA 01	SGN broadly support the indicative densities provided and, subject to detailed design considerations and viability work, we consider the Site has the potential to deliver affordable housing and a variety of tenures. However, we do advise this could be more simply communicated as an “ <i>up to</i> ” capacity.	Support noted. The Local Plan (para 13.9) already states that the site capacities are indicative only and should not be read prescriptively for the purpose of planning applications, where the optimal capacity of a site must be established on a case-by-case basis using the design-led approach, and having regard to relevant planning policies.	No change.
Southern Gas Networks (Carter Jonas obo)	3	LSA SA 01	<p><i>LB Lewisham officer note: SGN’s land ownership is included in the original representation. The map shows the extent of correct site boundary.</i></p> <p>We do note there are some discrepancies between this Site Location Plan and the indicative red line boundary for the allocation. We suggest that the Council can extend the red line boundary of the allocation to include this excess land owned by SGN, thus further increasing its overall capacity.</p> <p>As noted by the Council, we also recognise the potential for capacity to be even further increased, subject to the outcome of the proposals to extend the Bakerloo Line beyond Lewisham to Beckenham Junction.</p>	Boundary discrepancies are noted.	Former Bell Green Gas Holders and Livesey Memorial Hall site allocation amended to show correct boundaries.
Southern Gas Networks (Carter Jonas obo)	3	LSA SA 01	We recognise the objective of the Council to transform the Bell Green and Lower Sydenham area into a potential Opportunity Area in a future review of the London Plan, as well as its intentions to deliver a Bell Green and Lower Sydenham Masterplan and/or SPD to ensure the comprehensive redevelopment of this area – including further allocations to the east and south. This longer-term plan would	Support noted. Agree that the timeframe for delivery be amended.	Former Bell Green Gas Holders and Livesey Memorial Hall site allocation amended to show timescales for

			<p>include the designation of a new town centre and a potential new Bakerloo Line station in the Bell Green vicinity.</p> <p>Whilst SGN support the principle of long-term, comprehensive regeneration that maximises the delivery of housing and opportunities provided through the Bakerloo Line extension, we urge the Council to closely consider potential delivery timescales. We observe that the Site is the <u>only</u> allocation in the Bell Green and Lower Sydenham area with a timescale for delivery, not least a <i>deliverable</i> timescale within the first 5 years of the Plan Period. SGN can confirm that the Site is available for development now. We observe that other allocations are presently occupied and would therefore inevitably have a longer delivery period.</p>		delivery being within years 1-5 and 6-10.
Southern Gas Networks (Carter Jonas obo)	3	LSA SA 01 General	To conclude, whilst SGN strongly support development on the Site, a solely residential scheme is preferred and there is potential to increase the capacity through corrections to the developable red line boundary. In addition, we seek further clarity on how the Site would come forward at the earliest opportunity – including whether this could come forward in advance of the wider Masterplan.	Comments noted. Our response is set out above.	No change.
SGN (Quod obo)	3	LSA SA 01	<p>3 Challenges and Opportunities</p> <p>3.1 SGN welcome the Council’s allocation of the site for redevelopment, however, the Regulation 18 Local Plan does not yet fully recognise the significant constraints associated with redeveloping former utilities sites.</p> <p>3.2 Whilst the site allocation outlines the requirement for a ground survey to be undertaken to establish the nature of ground contamination and likely remediation, it is considered that the Reg 18 Plan does not yet recognise the significant limitations of cleaning up contaminated sites and specifically the cumulative constraints which arise from a re-development of gas works site will have an impact on deliverability, site capacity and viability.</p> <p>3.3 Gas works sites fall within the Sui Generis use class. The exceptional nature of Gas Works sites are the abnormal costs that exist in the ground as a result of years of gas production and storage. The investment risk profile of gas works sites is very different from traditional brownfields sites, with significantly higher up front abnormal costs experienced over a longer period of time, and larger levels of cost uncertainty.</p> <p>3.4 Finance holding costs are significant due to timeframe associated with these works, including regulatory approval, and the sequential order in which they have to be undertaken delaying the commencement of construction. For these reasons, national policy confirms that the Government gives substantial weight to the redevelopment and remediation of brownfield contaminated land, and the development of under-utilised land and buildings especially if this would help to meet housing needs.</p> <p>3.5 Initial investigations into the level of contamination at the Sydenham gas works was submitted to Lewisham as part of the prior approval application submitted for the removal of the gas holders (DC/18/1070607). The site investigation works undertaken on site by Atkins in 2016 on behalf of SGN identified significant contaminants within the made ground (aromatic hydrocarbons, polycyclic aromatic hydrocarbons, sodium hydroxide, sodium</p>	<p>The supplementary information about the site’s constraints including ground contamination and listed heritage features are noted.</p> <p>The site allocation already states ground surveys will need to identify the nature and extent of ground contamination, with remedial works and/or mitigation measures implemented, where necessary.</p> <p>Policies within the plan will be applied to this site in the same way as other sites. A viability appraisal will be needed to set out how the site constraints impact on the viability and deliverability of the site.</p> <p>The site allocation also mentions the Livesey Memorial Hall and provides references to other heritage assets on the site</p> <p>Following the Regulation 18 public consultation,</p>	<p>Former Bell Green Gas Holders and Livesey Memorial Hall site allocation amended to state that the site is constrained by former gas infrastructure, including a gas mains and gas ‘governor’ and a bentonite wall; and that the Council recognises the challenges of delivering this site given the de-contamination and remediation required.</p> <p>Former Bell Green Gas Holders and Livesey Memorial Hall site allocation amended to include the Livesey Memorial Hall and its grounds within the site’s boundary. Also amended to refer to the need to retain the heritage assets at the west of the site and incorporate them sensitively into the redevelopment of the remainder of the site, as well as acknowledging</p>

		<p>carbonate, sulphates, sulphides, carbonates, phosphates, cyanides, ammoniacal compounds, heavy metals and asbestos).</p> <p>3.6 Contaminated material may also have been buried in underground tar wells, liquor wells, pipes and purifier beds and will require removal. Any redevelopment of the site will also need to rationalise the existing gas ‘governor’, underground gas mains and remove any other underground structures and obstructions. All of which will have a significant associated cost.</p> <p>3.7 As demonstrated, in order to bring forward the Sydenham gas works site, substantial decontamination will be required to safely remove the soil and groundwater contaminated. The need for extensive de-contamination is even more critical in identification of emerging site allocation ambitions for residential uses and the delivery of an area of public realm.</p> <p>3.8 The approach that the London Plan has recently taken to Gas Works sites provides a relevant basis from which Lewisham Council should draw recent experience. Extensive discussions have taken place across a number of Gas Works sites and the policy direction by the Mayor of London has facilitated the successful redevelopment of challenging sites, delivering a significant number of new homes, jobs and community benefits.</p> <p>3.9 The implications of these complex site constraints are twofold: -</p> <ul style="list-style-type: none">▪ Financial viability: The exceptional costs associated with site remediation/ constraints, drives the need for density on a viability level. As part of any future planning application SGN or a future owner, will submit detailed evidence demonstrating the gas works site is subject of substantial contamination, and associated enabling and remediation costs in order to bring the site forward for development.▪ Spatial / developable area: The Gas Works site represents an opportunity to deliver a notable quantum of housing in order to meet local needs. It is therefore imperative that available, brownfield sites, such as the gas works, should be suitably optimised to deliver the level of homes that Lewisham Council need to deliver. The specific and bespoke spatial constraints of the site drive the need for height in order to bring forward the requisite level of development. <p>3.10 The complexity of delivering former utilities sites such as the Sydenham gas works site has not yet been fully recognised within the Reg 18 Plan and this will need to be addressed. We set out our recommendations for this in Section 4 of these representations.</p> <p>3.11 Notwithstanding the limitation of the below ground conditions of the site, further challenges to the development of the site are presented by the adjacency of the Grade II listed Livesey Memorial Hall (Listing No. 1253110), war memorial (Listed No. 1253111) and boundary wall (Listing No. 1253121), which are clustered to the gas work’s western boundary.</p> <p>3.12 The Grade II listed Livesey Memorial Hall and boundary wall were first listed in 1995. The Livesey Memorial Hall and boundary wall were constructed by the South Suburban Gas Company to act as a workspace for the gas works, which employment 380 men in 1911. The Hall was named after Sir George Thomas</p>	<p>additional work has been undertaken on the Lewisham Tall Buildings Study which will inform amendments to the Local Plan.</p> <p>The site allocation recognises the need for the bulk and scale of development to transition through the site. Tall buildings will not be appropriate across the whole site due to the proximity to, and the setting of the Livesey Memorial Hall and it’s grounds.</p>	<p>that tall buildings will not be appropriate in the western part of the site where maintaining the setting of the heritage assets should be prioritised.</p>
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SGN (Quod obo)	3	LSA SA 01	<p>4 Site Allocation 1 and LSA1 South Area – Representations</p> <p>4.1 The following section considers the emerging Site Allocation 1 Former Bell Green Gas Holders and Chapter 17 Lewisham South Area.</p> <p>Site Allocation 1 - Former Bell Green Gas Holders Indicative Capacity</p> <p>4.2 The indicative capacity of the site is for 73-178 homes, and gross non-residential floorspace of up to 2,345sqm (including 782sqm of employment and 1,563sqm of town centre).</p> <p>4.3 The Council’s site allocation background paper (2021) confirms that the site’s indicative residential capacity has been derived from the London-wide SHLAA methodology rather than a needs assessment, pre-application discussions or through a masterplan.</p> <p>4.4 LSA3 outlines that development within Bell Green and Lower Sydenham shall be guided by a Supplementary Planning Document or Masterplan. Accordingly, we consider it inappropriate for the site capacities to be set through an arbitrary SHLAA methodology rather than through a site-specific analysis, particularly for a complex site such as the Sydenham gas works site.</p> <p>4.5 Appendix A Table A.2 identifies the site with the following land use capacity: 65% residential; 20% main town centre; 10% employment; and 5% other. This land use mix conflicts with the general assumptions of uses for mixed-use development sites in Bell Green/Lower Sydenham masterplan, which identifies a</p>	<p>The Local Plan (para 13.9) already states that the site capacities are indicative only and should not be read prescriptively for the purpose of planning applications. The plan should be read as a whole.</p> <p>Disagree that the site should be solely residential and disagree with the indicative capacities proposed.</p> <p>Where no advanced pre-application has taken place, the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper.</p>	<p>Former Bell Green Gas Holders and Livesey Memorial Hall site allocation amended to increase residential capacity to 100-442 units, to decrease employment floorspace to 465m² and to increase main town centre uses to 1,859m².</p>

			<p>mix of 70% residential; 20% main town centre, and 10% employment. Whilst the site allocation background paper (2021) confirms that the indicative capacities should not be read prescriptively, they may unintentionally raise local communities’ expectations around the appropriate capacity prior to any design analysis. The actual development capacity of a site will ultimately need to be determined through the detailed design and planning approval process and this should be made clearer in the Reg 18 Plan itself.</p> <p>4.6 The London Plan sets out a design-led approach to determining the optimum development capacity of sites. To accommodate the growth identified in this Plan in an inclusive and responsible way, every new development needs to make the most efficient use of land by optimising site capacity. Policy D1 B (3) ‘London’s form, character and capacity for growth’ is clear that boroughs should follow the design-led approach (set out in Policy D3 ‘Optimising site capacity through the design-led approach’) to establish optimised site capacities for site allocations. Paragraph 3.3.4 of Policy D3 acknowledges that this should be through a consultative design-led approach that allows for meaningful engagement and collaboration with local communities, organisations, and businesses.</p> <p>4.7 In consideration of the indicative land use mix, the site allocation capacity should be revised to better reflect the site’s opportunities and London Plan policies.</p> <p>4.8 Prior to demolition, the gasholders on the site did not accommodate any employment floorspace and therefore this floorspace does not need to be re-provided as part of any new scheme. Accordingly, there is no obligation for the re-provision of employment floorspace as part of the site allocation and this capacity (782sqm) should be removed and re-allocated to the residential capacity to further optimise the gas works site as a strategic source of housing land.</p> <p>4.9 Further, the draft site allocation includes reference to community uses as being appropriate for the comprehensive mixed-use redevelopment of the site. An indicative community floorspace capacity would be challenging given the scale of the site and constrained nature.</p> <p>4.10 We therefore request the following amendments are made:</p> <table><tr><td>Indicative Development Capacity</td><td>Regulation 18</td><td>SGN Revisions</td><td></td></tr><tr><td>Net residential</td><td>73-178 units</td><td>230-300 units</td><td></td></tr><tr><td>Employment</td><td>782 sqm</td><td>0 sqm</td><td></td></tr><tr><td>Main Town Centre Uses</td><td>1,563 sqm</td><td>< 1,563 sqm</td><td></td></tr></table> <p>4.12 SGN welcomes the opportunity to enter discussions to help inform this approach and better inform the indicative capacity of the site and better link this capacity to the objectively assessed needs; whilst taking account of the delivery challenges of gas works sites and other draft policies contained within the Reg 18 Plan such as affordable housing.</p>	Indicative Development Capacity	Regulation 18	SGN Revisions		Net residential	73-178 units	230-300 units		Employment	782 sqm	0 sqm		Main Town Centre Uses	1,563 sqm	< 1,563 sqm		<p>Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the need to provide mixed use development with a different land use mix, to create a new sustainable neighbourhood, to retain continued community uses in the Livesey Memorial Hall as well as protecting the it’s setting. -Based on these considerations, the land use mix and residential units have been amended.</p> <p>Optimal capacity for the site will be established at planning application stage through a design led approach.</p>	
Indicative Development Capacity	Regulation 18	SGN Revisions																			
Net residential	73-178 units	230-300 units																			
Employment	782 sqm	0 sqm																			
Main Town Centre Uses	1,563 sqm	< 1,563 sqm																			
SGN (Quod obo)	3 3	LSA SA 01	Site Allocation (Paragraph 17.16) 4.11 SGN broadly support the principles of the site allocation, albeit to conform to London Plan policy we propose the following amendments.	Disagree, commercial uses are needed as part of a mixed used development, to create a new,	No change.																

		Para 17.16	<i>“Comprehensive mixed-use redevelopment with residential, commercial, and main town centre and community uses. Public realm and environmental enhancements, including new walking and cycle routes, and public open space”.</i>	sustainable community. Community uses will continue to be provided in the Livesey Memorial Hall.	
SGN (Quod obo)	3 3	LSA SA 01 Para 17.17	<p>Opportunities (Paragraph 17.17)</p> <p>4.13 SGN broadly support the opportunities section albeit propose removal of the following text: <i>“The site comprises a former gas works which is now vacant, with the gasholders having been dismantled. Redevelopment and site intensification, along with the introduction of a wider-range of uses, will bring the land back into active use and support local area regeneration”</i></p> <p>4.14 We also consider that the following opportunities for the site should be included within the site allocation, a number of which are commonly found across other local plans which include gas works sites.</p> <ul style="list-style-type: none">• It is noted that the former gasholder structure was a significant landmark in the area.• The site contained two former gas holders and significant infrastructure that supported its former use, including a gas mains and gas ‘governor’. The combination of these factors is likely to have an impact on deliverability, capacity and viability.• Given the industrial nature of the site, it is likely to be contaminated and/or have services running through it. Further consideration will need to be given to fully understand specific contamination and/or servicing issues.• Proposals should respond to constraints associated with existing utilities restrictions, easements or HSE guidance as appropriate.• Development should acknowledge the associated costs of decommissioning the gasworks and the relocation of any significant equipment and address any environmental pollution and on-site decontamination requirements caused by the gasworks.• For site allocations, the policies set out in this plan may be applied flexibly to ensure that the sites are viable and deliverable.	Agree that the site’s previous use as a gas holder should be further acknowledged. The need for ground surveys and remedial works are already mentioned in the site allocation. Policies within the plan will be applied to this site in the same way as other sites. A viability appraisal will be needed to set out how the site constraints impact on the viability and deliverability of the site.	Former Bell Green Gas Holders and Livesey Memorial Hall site allocation amended by removing the word “wider”, and referring to the retained elements of the gasholder structures, existing utilities infrastructure and the challenges associated with remediation of the site.
SGN (Quod obo)	3 3	LSA SA 01 Para 17.18	<p>Development Requirements (Paragraph 17.18)</p> <p>4.15 The site allocation outlines that any future development should be brought forward in accordance with Bell Green and Lower Sydenham masterplan. In absence of such masterplan or timeframe for this document to be published or made available, it is considered that this wording is contrary to the site’s delivery timeframe period of 2020-2025. In absence of an emerging masterplan, it is recommended that the obligation for a development to be brought forward in compliance with this masterplan is removed or greater clarity given on timeframes for publication of this document.</p> <p>4.16 We recommend that the Bell Green and Lower Sydenham masterplan should be published in tandem with the adoption of the Lewisham Local Plan to ensure there is no undue restriction placed on the delivery of sites across Bell Green and Lower Sydenham in the absence of the Masterplan. SGN would welcome the opportunity to work with Lewisham in preparation of a Masterplan.</p> <p>4.17 SGN request that the following changes are made to the supplementary text:</p>	Disagree A masterplan plays a critical role in clarifying design, capacity and phasing of the site, especially where there is a cluster of sites being transformed into a new, sustainable neighbourhood. Masterplans are already covered in Policy DM3 (Masterplans and comprehensive development) and there is merit in the site allocation referring to it.	No change. Former Bell Green Gas Holders and Livesey Memorial Hall site allocation amended to make reference to Policy DM3 (Masterplans and comprehensive development)

			• “Development must be delivered in accordance with a master plan for the Bell Green and Lower Sydenham area.”	Your interest in being involved in the masterplan is noted.	
SGN (Quod obo)	3 3	LSA SA 01 Para 17.18	<p>4.18 The site allocation includes a need to safeguard land to support the delivery of strategic infrastructure including the Bakerloo line extension. Whilst SGN are fully supportive of the Bakerloo extension and acknowledge that its delivery is a key driver to the regeneration of Bell Green and Lower Sydenham and its future designation as an Opportunity Area; the extension of the Bakerloo line beyond Lewisham to Lower Sydenham is currently the subject of consultation and there are no formal commitments from Transport for London in respect of its delivery or future funding. More pertinently, no site options have been identified and/or safeguarded as future location(s) for the new Lower Sydenham Bakerloo station. We note Lewisham Council have previously identified two potential locations for a new station, one of which is to/around Southend Lane.</p> <p>4.19 There is no safeguarding requirement in this location, and accordingly the following text should be removed from the site allocation’s development requirements: Safeguard land to support delivery of strategic transport infrastructure, including where required for the Bakerloo line extension.</p>	Disagree. A cluster of sites are proposed for development within the Bell Green masterplan area, in order to create a new, sustainable neighbourhood. Whilst a railway station will most likely be positioned in close proximity to the Hayes railway line, other strategic transport infrastructure may be needed and retaining this reference will provide flexibility.	No change.
SGN (Quod obo)	3 3	LSA SA 01 Para 17.19	<p>Development Guidelines (Paragraph 17.19)</p> <p>4.20 The site allocation sets the expectation that any development should deliver a cohesive and rational road network and street pattern in co-ordination with other adjacent site allocation. Any proposal will also be expected to investigate opportunities to reconfigure or remove the gyratory.</p> <p>4.21 Given the limited size of the site and the quantum of development that is necessary to be accommodated; the ability to provide a cohesive road network and street pattern would significantly curtail the developable area of the site and should therefore be removed. For the same reason, the site’s ability to reconfigure or remove the gyratory is unachievable, and accordingly, we request that these elements are removed from the site allocation.</p> <p>4.22 SGN are supportive of the ambition to improve walking and cycling links across the site and to deliver better connections to the surrounding area. It should however be noted that land to the north and west of the site is not within SGN’s control and is currently under private ownership. The ability to deliver improved walking and cycling routes through the site to the north and west are therefore likely to be undeliverable.</p> <p>4.23 Accordingly, we request that the development guideline text is updated as follows: Development should deliver a more cohesive and rational road network and street pattern, in coordination with other site allocations. There is an opportunity to open up new walking and cycle links to the east-west and north-south of the site, to create a legible and more permeable network of routes that connect to the surrounding neighbourhood areas. Proposals will be expected to investigate opportunities to reconfigure or remove the gyratory as part of an area-wide strategy.</p>	Agree.	Former Bell Green Gas Holders and Livesey Memorial Hall site allocation amended using proposed wording.

SGN (Quod obo)	3 3	LSA SA 01 Para 17.19	<p>4.24 The current wording of the site allocation outlines that any future development should seek to optimise the capacity of the site taking into account future planning transport accessibility levels as associated with the Bakerloo line extension.</p> <p>4.25 In order to fully optimise the site capacity, it is recommended that the gas works site should be defined as an appropriate location for tall buildings. The optimisation of brownfield sites in opportunities areas and the delivery of development at higher densities is supported by the London Plan (Policy H1, Footnote 59 and GG2).</p> <p>4.26 Further justification for the site’s appropriateness for tall buildings is provided in identification of the height of the former gas holder structures (35m), the proximity of existing tall buildings in the vicinity of the site (namely, the eight storey Orchard Court development), and the allocation of the adjacent sites as suitable for tall buildings at Figure 5.1 of the Reg 18 Plan.</p> <p>4.27 We recommend the following amendments to bullet two: <i>To achieve the optimal capacity of the site and promote Bell Green and Lower Sydenham as a future opportunity area, tall buildings of up to 35m in height (10 residential storeys) to aid legibility, wayfinding and the delivery of the site given its constraints may be acceptable subject to a sympathetic design that respects the Area of Special Local Character. development proposals should take into account future public transport accessibility levels, as associated with the Bakerloo line extension.</i></p>	<p>Disagree. The site allocation recognises the need for the bulk and scale of development to transition through the site. Tall buildings will not be appropriate across the whole site due to the proximity to, and the setting of the Livesey Memorial Hall and it’s grounds.</p> <p>Following the Regulation 18 public consultation, additional work has been undertaken on the Lewisham Tall Buildings Study which will inform amendments to the Local Plan.</p> <p>Optimal capacity for the site will be established at planning application stage through a design led approach and tall buildings will be considered in line with Policy QD4 (Building heights).</p>	Former Bell Green Gas Holders and Livesey Memorial Hall site allocation amended by acknowledging that tall buildings will not be appropriate the western part of the site where maintaining the setting of the heritage assets should be prioritised.
SGN (Quod obo)	3 3	LSA SA 01 Para 17.19	<p>4.28 The fourth bullet point states that development should be designed to provide an appropriate transition in bulk, scale and massing from the site to its surrounds, which are predominantly suburban in character.</p> <p>4.29 The development guideline contradicts the site allocation and the strategic vision for Lewisham South Area (Paragraph 17.8), which identifies that the site is within an ‘Urban’ setting, and the future redevelopment of the area shall be brought forward comprehensively in an Urban character. The London Plan also requires sites such as this to be optimised as a strategic source of housing.</p> <p>4.30 The text should be updated as follows: <i>Development should be designed to provide an appropriate transition in bulk, scale and massing from the site to its surrounds. which are predominantly suburban in character. Tall buildings may be appropriate in this location to address the challenges of delivery and to achieve other policies of this plan. The site is predominantly suburban in character.</i></p>	<p>Disagree that the site should achieve an urban setting, given the presence of heritage assets on-site.</p> <p>Following the Regulation 18 public consultation, additional work has been undertaken on the Lewisham Tall Buildings Study which will inform amendments to the Local Plan. Our response to tall buildings is set out above.</p>	No change.
SGN (Quod obo)	3 3	LSA SA 01 Para 17.19	<p>4.31 Bullet point six outlines that a ground survey shall be undertaken to establish the extent of ground contamination and level of remediation required.</p> <p>4.32 As demonstrated, the site is known to have significant below ground contaminates that will require costly decontamination. The draft site allocation</p>	Disagree with the wording proposed. Policies within the plan will be applied to this site in the same way as other sites. A viability	Former Bell Green Gas Holders and Livesey Memorial Hall site allocation <i>amended to state:</i> That the Council

			<p>development guidelines do not sufficiently consider this constraint and accordingly, SGN request the following additional wording:</p> <p><i>Ground surveys will need to identify the nature and extent of ground contamination, with remedial works and/or mitigation measures implemented, where necessary. The Council recognises the need for significant remediation of the site, which will be taken into account as part of the development’s viability assessment and will be considered when assessing the site requirements for affordable housing and other policies.</i></p>	<p>appraisal will be needed to set out how the site constraints impact on the viability and deliverability of the site.</p>	<p>recognises the challenges associated with significant decontamination and remediation of the site</p>
SGN (Quod obo)	3 3	LSA SA 01 Para 17.19	<p>4.33 SGN request that the challenge of delivering a site in an opportunity area be recognised and therefore aligned to GLA policy. The Mayor’s Affordable Housing & Viability SPG states that “<i>Opportunity Areas and Housing Zones are key sources of housing supply in London. They are, by their nature, complex to bring forward and often require significant investment in infrastructure. They are also of a scale that can create fundamentally new places and communities</i>”.</p> <p>4.34 The site allocation should provide an element of flexibility to affordable housing provision as set out in the Mayor’s Affordable Housing & Viability SPG. The SPG states “<i>when considering Opportunity Areas, Housing Zones and industrial land, LPAs may wish to apply a localised affordable housing threshold for the Fast-Track Route</i>”. SGN therefore proposes the inclusion of a new bullet point:</p> <p><i>(Bullet Eight) “The site is located within an Opportunity Area. Opportunity Areas are key sources of housing supply in London. They are, by their nature, complex to bring forward and often require significant investment in infrastructure. The Council will take into consideration the viability challenges of the site when assessing the requirements under affordable housing and other policies.”</i></p>	<p>Disagree. Whilst Opportunity Area status is an aspiration for the Bell Green/Lower Sydenham area, it is not currently designated as such and it would be premature to refer to it as an Opportunity Area.</p>	<p>No change.</p>
SGN (Quod obo)	3 3	LSA SA 01 Para 17.19	<p>4.35 Finally, to reflect the significant limitations of the site, we request that the following text is included by the site allocation for the Sydenham gas works as a new bullet point:</p> <p><i>(Bullet Nine) The site contains existing utilities restrictions, easements; a Hazardous Substances Consent; a former gas holder and significant infrastructure that supported its former use, including a gas mains and gas ‘governor’. This site, may be subject to substantial decontamination, enabling and remediation costs which may have an impact on deliverability and viability. If it is robustly demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring the site forward for residential led mixed-use development (in accordance with LPH1, LP Footnote 59 and the site allocation) then the Council may apply flexibility to the policies set out in the Reg 18 Plan.</i></p>	<p>Disagree. Recognition regarding site constraints, remediation, deliverability and viability have already been mentioned in the site allocation.</p>	<p>No change.</p>
Next Plc (Q+A Planning Ltd obo)	- 3	General LSA SA 02	<p>LB LEWISHAM LOCAL PLAN – ‘MAIN ISSUES AND PREFERRED APPROACHES’ REPRESENTATION ON BEHALF OF NEXT PLC</p> <p>1. Q+A Planning Ltd is instructed by Next plc to respond to the current consultation on the new ‘Lewisham Local Plan – Main Issues and Preferred Options’. Having reviewed the consultation material, we wish to comment on the proposed allocation for redevelopment of the existing Bell Green Retail Park, as identified in South Area Policy LSA3 and Allocation 2.</p>	<p>The supplementary information is noted.</p>	<p>No change.</p>

			<p>2. Our client operates a Next store at Bell Green Retail Park. The Park is a relatively recent development, having been completed in 2013. It is successful and provides a valuable service to the community of south Lewisham and the surrounding area.</p> <p>3. The Park serves a densely populated area with significant levels of trade coming from within a radius of a few miles. It is accessible by a choice of means of transport, and also benefits from its proximity to the Bell Green Sainsbury's supermarket, which allows customers to visit both locations on a single trip.</p> <p>4. The recent pandemic has highlighted the importance of good local provision of retail facilities. Since March 2020, Next's outlets in retail parks have significantly outperformed those in city centres and regional shopping centres. Shopping habits changed during the pandemic as customers preferred the convenience and environment of retail park-style locations, while city centres suffered from the loss of office workers and general footfall.</p> <p>5. Moreover, although on-line sales have increased rapidly since March 2020, these too have an important relationship with the company's store portfolio. Before the pandemic, online customers collected nearly 50% of their orders and returned over 80% of returns through stores, and this important interaction between on-line ordering and physical outlets is expected to continue in the future.</p> <p>6. In short, the company has found that Bell Green is a successful trading location. Its store there provides a valuable service which is popular with local customers, and is expected to provide an important part of the company's representation in this area of London in the future.</p>		
Next Plc (Q+A Planning Ltd obo)	3	LSA SA 02	<p>9. There are a number of points to be made about the Council's intentions at Bell Green. In particular:</p> <ul style="list-style-type: none"> • The replacement of the Retail Park with other uses, with the consequent loss of the important retail and service function and the substantial level of existing employment it provides, does not appear to be justified anywhere in the Plan. We are not aware of any evidence to show that the Council has considered the current and future role of the Park, and found it in some respect to be unsatisfactory. We note the Council's view (page 244) that <i>'the future of out of centre retail parks needs to be considered'</i> but cannot see the sort of detailed evaluation of the current and future role of the park that would be expected to be undertaken, before a decision is taken that it is an appropriate location for redevelopment; • The loss of a significant retail location also seems surprising, since the Council already acknowledges (page 243) that it is likely to need to <i>'about 5,300 square metres of new retail floorspace ... by 2030'</i>; • Early redevelopment of a recently-built retail park would not appear to be a sustainable approach given the significant expenditure of energy and materials that would have been committed at the time of the scheme's construction; and • It is not clear that the redevelopment will be deliverable, particularly if existing occupiers including our client wish to remain trading at the Park in future. It has long been accepted that deliverability is a fundamental aspect of sound 	Objection to the redevelopment of the Bell Green Retail Park is noted. The site allocation does not preclude the re-provision of retail units within the redeveloped site but the concerns over site delivery and that one of the site allocations landowners wants to remain trading are noted.	No change.

			<p>allocations in a new Plan, and in this instance there would appear to be significant doubts about the likelihood of a successful and relatively recent retail park becoming available for redevelopment.</p> <p>10. We note also that the emerging Plan places emphasis on the importance of working together with stakeholders to deliver good quality developments. We support this approach but envisage that in this instance partnership working with occupiers could be aimed at securing the future of the Park, and maximising its benefits in terms of the valuable and popular local service that it provides to residents of the area.</p> <p>11. Accordingly, we object to the Council’s proposed allocation of the Bell Green Retail Park as a location for comprehensive development, in that it would threaten the future of our client’s successful and popular retail facility. Moreover, the proposed redevelopment does not appear to be justified either by a thorough and detailed examination of the current and future role of the Park, nor an assessment of the likelihood of securing redevelopment.</p>		
Tetra Tech Planning (John Lyon’s Charity obo)	- 3	General LSA SA 02	<p>On behalf of our client, John Lyon’s Charity, landowners of “Trade City”, Bell Green, Sydenham, we respectfully submit the following representations to the “Local Plan Regulation 18: Main Issues and Preferred Approaches” consultation. John Lyon’s Charity (“the Charity”) can trace its roots back to the 16th century and exists to give grants to benefit children and young people up to the age of 25 across several boroughs in London. The Charity’s mission is to promote the life-chances of children through education and they support a wide range of projects that provide opportunities for young people including youth clubs, arts projects, counselling initiatives, parental support schemes and academic bursaries. Since 1991, the Charity has distributed over £156million to a range of services for young people. The Charity generates much of its income through property investment such as Trade City.</p> <p>The Charity welcomes the opportunity to respond to the Regulation 18 consultation and looks forward to working with the Council in developing its vision and objectives for the Local Plan, the South area and specifically ‘Site Allocation 2: Bell Green Retail Park’, which includes its landholding, Trade City. Trade City consists of 15 industrial/warehouse/trade counter units with associated parking set within landscaped areas.</p> <p>In responding to the Regulation 18 consultation, the Charity sets out its responses to a number of key areas which it considers to be central to the delivery of Good Growth over the Plan period. In each key area, we respond to the questions specifically asked by the Council.</p>	The supplementary information is noted.	No change.
Tetra Tech Planning (John Lyon’s Charity obo)	3	LSA SA 02	<p>Do you have any comments on the proposed site allocations?</p> <p>Site Allocation 2 – Bell Green Retail Park (which includes “Trade City”)</p> <p>Bell Green Retail Park and Trade City are successful and very popular destinations both in the area and across south-east London.</p> <p>The Charity supports the inclusion of its holding (“Trade City”) within the proposed site allocation known as “Bell Green Retail Park” (No.2), a site</p>	Support noted. Agree that a masterplan plays a critical role in clarifying design, capacity and phasing of the site.. Masterplans are already covered in Policy DM3 (Masterplans and comprehensive development) and there is	Bell Green Retail Park site allocation amended to make reference to Policy DM3 (Masterplans and comprehensive development) and public access to Waterlink Way and the SINC.

			<p>allocation which is brought forward within all three spatial strategy options and the preferred option.</p> <p>The Charity strongly supports the “Comprehensive mixed-use redevelopment of the existing out-of-centre retail park with compatible residential, commercial, main town centre and community uses”. The Charity supports the Council’s commitment to maintaining the strong retail offer in this location, particularly in light of the ongoing pandemic and its impact on the ‘High Street’. We would agree with the findings within the IIP that there “is a degree of risk associated with mixed used redevelopment of existing employment sites under higher growth scenarios, in that provision of space for existing or future light industrial uses could be compromised or prove challenging to deliver” . The Charity recognises the role that any forthcoming Supplementary Planning Document and/or Masterplan will play in clarifying design options, development capacity and phasing, and reiterates once again the importance of such a process coming forward as a matter of urgency.</p> <p>The Charity also supports its comprehensive redevelopment through reconfiguration of existing buildings and spaces to facilitate a new layout with improved routes, both into and through the site, which will assist vehicle users and pedestrians alike. The retail park’s location, adjacent Pool River offers significant opportunities to provide a high-quality environment; providing walking and cycling facilities for residents, visitors, shoppers and staff.</p> <p>An indicative development capacity for both residential units and non-residential floorspace is provided. We note that these indicative capacities have been based on “the density assumptions used in the London-wide SHLAA (2017) methodology... which informed the draft new London Plan (Intend to Publish version)”. We would note that the new London Plan (March 2021) no longer includes the density matrix and development capacity should be brought forward based on a design-led approach.</p> <p>The development guidelines state that the “Development must (our emphasis) be delivered in accordance with a master plan for the Bell Green and Lower Sydenham area. Considering the Council’s definition of “Masterplan” in the Glossary of the Local Plan and the extensive detail that is included, it would be remiss of the Council to delay the work necessary for such a significant Masterplan any longer. The Charity has not been approached by the Council to provide its views on a Masterplan for the area and therefore if this work has not commenced it is imperative that it does start now. If work has commenced, we can confirm that the Charity wishes to be involved.</p> <p>The development guidelines advise that “to achieve the optimal capacity of the site, development proposals should take into account future public transport accessibility levels, as associated with the Bakerloo line extension”. According to the TfL’s WebCAT PTAL site, the PTAL for the site does not change in the forecast year of 2031 and remains at PTAL 1b/2 across the site, therefore this is an unknown element.</p>	<p>merit in the site allocation referring to it.</p> <p>Your interest in being involved in the masterplan is noted.</p> <p>The site allocation already makes reference to the Pool River but there is merit in emphasising public access to it.</p> <p>Whilst the London Plan density matrix no longer exists, a SHLAA based approach has been used as a starting point in determining site capacities. In many instances sensitivity testing has been applied, to take into account the site’s characteristics and surroundings.</p> <p>Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the need to provide mixed use development by introducing residential units, as well as a revised land use mix. -Based on these considerations, the capacity has been amended. In particular, a range of residential capacities have been included in the site allocation, with the lower figure based on a baseline scenario and the higher figure based on a growth scenario which envisages the delivery of the BLE south of Lewisham and the</p>	<p>Bell Green Retail Park site allocation amended to increase residential capacities to 784-1,831 units. Employment floorspace has been reduced to 3,740.</p>
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				<p>Bell Green area designated as an Opportunity Area.</p> <p>Optimal capacity for the site will be established at planning application stage through a design led approach.</p>	
Stoken Properties Ltd (Boyer obo)	3	LSA SA 04	<p><i>Relates to Call for site</i></p> <p><i>Stanton Square Locally Significant Industrial Site</i></p> <p>Stoken Properties Ltd. own the northern part of the site as identified on the accompanying Site Location Plan and known as 491-499 and 501-505 Southend Lane. We are pleased to see that the site has been included within the Local Plan as an area with potential for mixed-use development, and set out our thoughts and comments below.</p> <p>In terms of opportunities, we are extremely supportive that the redevelopment and site intensification potential of the site with the co-location of commercial and other uses has been acknowledged by the Council. As detailed within the accompanying Call for Sites application, it is considered that the site may come forward as phased development with the first phase facilitating future phases. It is therefore important to ensure that any phased development will not prejudice the future development of the rest of the site.</p> <p>With regards to development requirements, it is encouraging to see that a masterplan for the site is proposed and we would welcome future involvement in the preparation and discussions involving any such masterplan.</p> <p>Whilst we support that development must not compromise the functional integrity of the employment location, we again would seek clarification on the use of “capacity” and suggest that it relates to employees as opposed to floor area to take into account new and evolving working practices.</p> <p>We are in general agreement with the development guidelines including that in order to achieve optimal capacity of the site that development proposals take into account future public transport accessibility levels, as associated with the Bakerloo line extension. This ensures an efficient use of the site, maximising its planning potential and is supported.</p> <p>We are in agreement that non-employment uses, including residential uses, should be sensitively integrated into the development in order to ensure the protection of amenity for all site users. This would indicate that less industrial intensive uses such as workshops and studios, which have been proven to successfully exist with residential uses, would be appropriate at this location and would help deliver the Council’s aspirations for the site.</p> <p>We would suggest that the site allocation is kept in the Local Plan given the substantial planning opportunities it presents in terms of providing a more optimal use of land to deliver the Council’s ambitions for the Lewisham South</p>	<p>Support noted. Comments relating to stakeholder engagement in the masterplan are noted. Agree there is merit in referencing phasing of development across the site.</p> <p>Supplementary text to Policy EC2 Protecting employment land and delivering new workspace provides clarity on the net loss of industrial capacity. Table 8.3 also provides a formula for calculating financial contributions for the loss of industrial capacity. The Plan should be read as a whole.</p>	<p>Stanton Square LSIS site allocation amended to reference co-location and phasing of the development, working in partnership and Policy DM3.</p>

			Area. The mixed-use redevelopment of the site will make an important contribution to the overall economic and social objectives of the Plan and has the potential to deliver a significant quantum of residential development alongside high quality commercial floorspace, which will help meet housing targets.		
Tesco Stores Ltd (Lichfields obo)	- 3 3	General LCA SA 06 LCA SA 19	<p>Representations to Main Issues and Preferred Approaches consultation for the Lewisham Local Plan (Reg 18) on behalf of Tesco Stores Ltd</p> <p>Tesco Stores at Conington Road, Lewisham (SE13 7PY) and Catford Shopping Centre and Milford Towers, Catford (SE6 4J)</p> <p>Lichfields has been instructed by our client, Tesco Stores Ltd (hereafter referred to as ‘Tesco’), to review the draft Plan having regard to its two retail store and property interests above and to submit representations to the Main Issues and Preferred Approaches consultation for the Lewisham Local Plan (Reg 18) (‘LLP’). Please see below:</p> <ul style="list-style-type: none"> • our comments on the vision and spatial objectives for Lewisham’s Central Area; • our comments on retail parking; • our site-specific representation in relation to the Tesco superstore, petrol filling station and car parking site at Conington Road and Lewisham Road which is covered by draft site allocation SA6; and • our site-specific representation in relation to the Tesco large supermarket and car parking at Catford Shopping Centre, which is included within draft site allocation SA19; 	Comments noted.	No change.
Tesco Stores Ltd (Lichfields obo)	- 3 3	General LCA SA 06 LCA SA 19	We trust that our representations will be taken into consideration in the progression of the emerging Lewisham Local Plan. We would be grateful for the opportunity to meet with you to discuss our suggested amends to the above policies and the Lewisham SA6 and Catford SA19 allocations.	Comments noted.	No change.
L&Q Group	3	LSA SA 08	We note that the ‘Opportunities’ section of Site Allocation 8 – Excalibur Estate, which is being developed by L&Q in partnership with Lewisham Homes, is incorrect. At the time of writing, Phase 1 is only partially complete (Sub-phases 1A and 1B are practically complete, with Sub-phase 1C aiming to start on site later this year) and Phase 2 has not yet been started. We would be grateful if the site allocation could therefore be updated accordingly.	Agree.	Excalibur Estate site allocation amended to reflect the current delivery of the site.
HHGL Ltd (G R Planning Consultancy Ltd obo)	- 3	General LSA SA 10	<p>Please find attached representations to the above plan submitted on behalf of my clients, HHGL Ltd.</p> <p>As I have explained in the letter, my clients appreciate that these comments are submitted late, but in view of the flexibility that the local plan system offers and the importance of our representations in relation to the Catford area of Lewisham, we would be grateful if the Council could accept these late submissions and take them on board in preparing the Preferred Submission version of the plan.</p> <p>I would, of course, be happy to discuss any aspect of my clients representations further, if that would assist at this stage.</p> <p>I would be grateful if you could acknowledge safe receipt of these representations</p>	Comments noted.	No change.

HHGL Ltd (G R Planning Consultancy Ltd obo)	- 3	General LSA SA 10	<p>EMERGING LEWISHAM LOCAL PLAN – HOMEBASE, BECKENHAM HILL ROAD, CATFORD</p> <p>I refer to the consultation on the Main Issues & Preferred Approaches to the emerging Lewisham Local Plan (Draft Plan) which took place between 15 January 2021 and 11 April 2021. I act on behalf of HHGL Ltd, which trades as Homebase within the UK & Ireland.</p> <p>My clients are aware that the consultation period on the Draft Plan has now ended and apologise that we were not in a position to respond to the Draft Plan. Nevertheless, they have asked me to write to you to confirm their position in relation to their Homebase store on Beckenham Hill Road in Catford and to establish a point of contact, which will hopefully assist in future discussions between my clients and Planning Policy.</p> <p>As you may be aware, Homebase was sold by Wesfarmers to Hilco Capital Ltd (Hilco) in May 2018. This followed Wesfarmers attempts to rebrand the business ‘Bunnings’, a DIY format that they operated in Australia and New Zealand. The ‘Bunnings’ brand did not gain traction in the UK, prompting Wesfarmers to sell the business Hilco. Hilco purchased the business with the specific aim of investing in the Homebase brand and returning the business to its traditional roots. As part of that strategy Homebase streamlined its portfolio, returning unprofitable stores to their owners and downsizing larger stores that no longer met the requirements of the business.</p> <p>That strategy was implemented by a new management team and together with the current owners (Hilco), they have successfully turned around the fortunes of the national Homebase business. In February 2020 Homebase issued an update of this progress, announcing a return to profit well ahead of expectations (Source: Homebase press release 27 February 2020). It was an extraordinary turnaround bearing in mind the difficulties that the UK retail sector continues to experience and placed the business in a very good position not only to grow and expand further, but also to preserve the existing jobs that its Catford store supports, as well as the thousands of jobs that the business supports throughout the UK.</p> <p>That success has been based on its strong brand, the fact it remains one of the most recognisable retailers in the UK, the introduction of new ranges and concessions, continuing investment in its staff qualifications, knowledge and expertise, and its future commitment to ongoing investment in refurbishing and extending existing stores.</p> <p>Whilst Homebase stores were closed during the initial months of the first Covid 19 lockdown, following their reopening and in May/June 2020, sales at all UK Homebase stores grew by over 25% compared to the same two months in 2019. This performance has been reflected during the second lockdown and combined with Homebase’s role as an ‘essential retailer’, it has placed the business in an extremely strong position to assist with the UK’s economic recovery post Covid 19.</p> <p>The full implications of the Covid 19 pandemic on the UK economy will not be known for some time. Even so, it is apparent that some businesses will not</p>	Comments regarding the leaseholders who want to remain trading are noted.	No change.
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			survive. Within the retail sector, operators who were struggling before Covid 19 continue to fall into administration. The emergence of Covid 19 has, in our view, significantly increased the importance of supporting and retaining businesses like Homebase. In this respect, my clients have confirmed that their current lease on the Catford store extends to September 2025. The store is successful and profitable, with a loyal customer base and experienced staff. Homebase are firmly committed to retaining its representation on the site and will be seeking to renew their lease at the appropriate time.		
HHGL Ltd (G R Planning Consultancy Ltd obo)	- 3	General LSA SA 10	<p>I would be grateful if you could acknowledge receipt of this letter and include our details on the Local Plan data base.</p> <p>I would, of course, be happy to discuss any aspect of the above further or provide any additional information on my client’s position or their business requirements.</p>	Comments noted.	No change,
LaSalle Investment Management (Savills obo)	- 3	General LSA SA 10	<p>LONDON BOROUGH OF LEWISHAM LOCAL PLAN REGULATION 18 STAGE CONSULTATION REPRESENTATIONS MADE ON BEHALF OF LASALLE INVESTMENT MANAGEMENT</p> <p>Introduction We write on behalf of our client, LaSalle Investment Management (‘LSIM’), in respect of its land interests in land at 10 Beckenham Hill Road in Catford.</p> <p>This letter is submitted to provide representations to the consultation on the London Borough of Lewisham Local Plan Regulation stage “Main Issues and Preferred Approaches’ document.</p> <p>These representations are also made in the context of pre-application discussions undertaken with the Local Planning Authority (‘LPA’) in respect of LSIMs land ownership at 10 Beckenham Hill Road in Catford (the ‘Site’).</p> <p>The Site is previously developed land and currently comprises a Homebase store and associated car park.</p> <p>The emerging Local Plan identifies the Site as an allocation for residential-led mixed use development within Lewisham’s South Area, under ‘Site Ref: 10’.</p> <p>LSIM recognises the importance of the planning policy framework to help it and its partners realise their respective ambitions and look forward to working with the Council to develop an appropriate framework to create the certainty of outcome required to enable this key site to be brought forward for development with confidence.</p> <p>In summary, LSIM supports the aspirations of investment and growth within Lewisham and the identification of appropriate redevelopment to help meet the requirements of the existing and new population over the plan period.</p>	Comments and support noted.	No change.
LaSalle Investment Management (Savills obo)	- 3	General LSA SA 10	<p>Site Details As set out above, LSIM’s land ownership comprises the purpose built Homebase retail warehouse located off Beckenham Hill Road/Bromley Road in Catford.</p> <p>The Site extends to circa 1.7 hectares and comprises previously developed land in the form of an existing retail store and associated car park. The principle vehicle</p>	The supplementary information is noted.	No change.

			<p>access and egress to the Site is via Beckenham Hill Road with an additional exit only on to Bromley Road.</p> <p>The existing Homebase store was constructed pursuant to planning permission for development of a <i>‘single storey retail unit for the sale of non-food items with ancillary tea room, children’s play area and garden centre and the provision of a minimum of 100 car parking spaces and service road’</i> granted at appeal on 16 July 1982 (LPA Reference: LE/472/C/TP).</p> <p>On 17 April 2019, planning permission was granted for the variation of Condition 6 (restriction on sale of food) of Application LE/472/C/TP in order to allow the sale of all goods falling within Class A1 (retail) (Ref: DC/18/108884).</p> <p>Land uses surrounding the Site are predominantly residential and range from traditional two storey semi-detached properties to the south and north-west, three storey flats to the south and north east and taller modern flatted developments of five to nine storeys located to the north.</p> <p>To the east of the Site on the opposite side of Bromley Road is St Johns Church (Grade II listed), a two storey community building known as the Green Man and a Fiat garage. To the rear of the Site is Catford Wanderers Sports Club.</p> <p>The Site has a PTAL Rating of 3 and therefore benefits from ‘good’ accessibility by a range of modes of public and sustainable modes of transport.</p> <p>There are no statutory listed buildings on or adjacent to the Site nor does it fall within or adjacent to a Conservation Area.</p> <p>The Environment Agency’s flood risk map shows the majority of the site to be in Flood Zone 2 meaning that there is a medium probability of potential flooding.</p>		
LaSalle Investment Management (Savills obo)	- 3	General LSA SA 10	<p>Representations to the Local Plan Regulation 18 Consultation</p> <p>Below we provide our principal comments and/or amendments to the relevant parts and policies of the Local Plan to ensure that the Plan is legally compliant and sound having regard to its deliverability and application. We trust will be afforded appropriate weight in the consultation process.</p> <p>These representations have considered the emerging Local Plan in the context of the requirements established by the National Planning Policy Framework (February 2019) and London Plan 2021 (March 2021).</p> <p>General Comments</p> <p>The National Planning Policy Framework (‘NPPF’) requires all Local Plans to be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p> <p>Local planning authorities should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change.</p>	Comments noted.	No change.

			<p>They should be consistent with the principles and policies of the NPPF, and should be aspirational but realistic to address spatial implication of economic, social and environmental dimensions.</p> <p>As the Local Plan emerges, it is important that it adheres to the requirements of the NPPF in positively promoting new development across the Local Plan area.</p>		
LaSalle Investment Management (Savills obo)	- 3	General LSA SA 10	<p>We trust that these formal representations will be afforded the appropriate weight by the LPA and assist in the formulation of the emerging Local Plan. We would also be grateful if you could acknowledge receipt of these representations and keep us updated of any further stages of consultation, so that we can provide comments as may be required.</p> <p>Should you require any clarification or additional information, please do not hesitate to contact us.</p>	Comments noted.	No change.
LaSalle Investment Management (Savills obo)	3	LSA SA 10	<p>LSIM would also confirm its strong support for the allocation of the Homebase / Argos site on Bromley Road in the medium to long term subject to:</p> <p>1. The allocation not jeopardising its active asset management in the short to medium term; and</p> <p>2. An increase in the residential quantum envisaged by the allocation which would be necessary to support the viable redevelopment of the retail floorspace given its high existing use value</p>	Support noted. Our response is set out below.	No change.
LaSalle Investment Management (Savills obo)	3	LSA SA 10	<p><i>Site Allocations</i></p> <p>The Site is proposed as an allocation within ‘Lewisham’s South Area’ for comprehensive residential-led mixed use redevelopment in the emerging Local Plan under ‘Site ID: 10’.</p> <p>It is stated that the allocation has an indicative development capacity of 141 net residential units and 5,694 sq. m of gross non-residential floorspace. The draft allocation sets out that the intensification of the Site, along with the introduction of a wider range of uses, will provide a more optimal use of land. Furthermore, any proposals for redevelopment of the Site would need to accord with a series of and requirements and guidelines linked to delivery of new and improved public realm, green infrastructure and positive frontages. LSIM supports the principle of the emerging allocation of the Site for comprehensive redevelopment which can help to meet strategic objectives in terms of residential land supply, economic growth and employment generation within Catford in the mid to long term. LSIM does however have a number of comments in relation to the specific requirements of the Site Allocation, which are detailed further below.</p> <p><u>Residential Yield</u></p> <p>The Site Allocation is identified to deliver an indicative development capacity of 141 net residential units.</p> <p>Whilst LSIM acknowledges the capacity quoted is for indicative purposes, this should be increased such that it more accurately reflects the potential of the Site. The initial design concepts presented as part of the pre-application process have demonstrated that the capacity of the Site significantly exceeds the emerging allocation.</p>	<p>Support noted. The pre-application is likely to evolve prior to the submission of a planning application, and so cannot be relied upon to provide a design led capacity for this site. In these instances, the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper.</p> <p>Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the need to provide mixed use development by introducing residential units, retention of the pond and to reflect the surrounding character of</p>	No change.

			<p>The amount of non-residential floorspace should also be reduced. A residential led, mixed use scheme would not support such a substantial quantum of non-residential space. A lower quantum of non-residential floorspace can still contribute appropriately towards the wider aspirations for the A21 Corridor in terms of creating positive frontages along Bromley Road and Beckenham Hill. Critically, given the high existing use value of the existing retail uses, any revised development scheme will need to exceed the indicative residential capacity to realise the objective of comprehensive redevelopment of the Site.</p> <p>A lower density scheme in line with the indicative capacity would mean that the opportunities offered by the site cannot be realised during the Plan period. The effect of this would be to:</p> <ol style="list-style-type: none">1. Reduce the housing supply generated by Site Allocations by 141 units which increases the demand placed on other, less suitable sites; and2. Lose wider benefits linked to comprehensive redevelopment including the delivery of more appropriate, in terms of configuration and mix, commercial space and improved layout and public realm. <p>On the basis that the Site has been specifically identified as suitable for residential uses, and the quantum of development required to facilitate a viable redevelopment would be significant, the indicative capacity should be increased to a minimum of 300 units.</p> <p>This would be more consistent with the Plan’s strategic focus of delivering housing land supply on previously developed and brownfield sites, the optimisation of housing delivery and a ‘design led’ approach as recently adopted by the London Plan2.</p> <p>The proposed intensification of the Site in this manner would help to meet the Borough’s need for additional residential units in a preferred and sustainable location.</p> <p>It would also ensure that the delivery of a residential led development at the Site can make a significant contribution towards public amenity and accessibility (re-establishing connections with existing green spaces) as is envisaged by the allocation.</p> <p>As drafted, the emerging allocation fails to recognise the opportunity and true capacity of the Site and in that regard is unsound.</p>	<p>Southend Village. -Based on these considerations, the land use mix and residential units remain the same.</p> <p>Optimal capacity for the site will be established at planning application stage through a design led approach.</p>	
LaSalle Investment Management (Savills obo)	3	LSA SA 10	<p><u>Proposed Land Uses</u></p> <p>Whilst LSIM supports the proposed allocation of the Site for residential development and compatible main town centre, commercial and community uses, we consider that the Policy should include flexibility to support the retention of the existing retail uses without reference to such a prescriptive capacity figure.</p> <p>As stated above, a residential led, mixed use scheme would not support such a substantial quantum of non-residential space as that identified (5,694 sq. m) and the proposed allocation should reflect this position. A lower quantum of non-residential floorspace can still contribute appropriately towards the aspirations for the A21 Corridor in terms of creating ground floor activity.</p>	<p>Disagree that the non-residential floorspace figure should be excluded from the Local Pan. The Local Plan provides indicative site capacities. Optimal capacity for the site will be established at planning application stage through a design led approach. Agree that the redevelopment should not</p>	<p>Homebase/Argos site allocation amended to acknowledge that redevelopment will take place in the medium to long term.</p>

			<p>LSIM would request that the allocation policy be revised to remove a figure for gross non-residential floorspace but state that the delivery of main town centre uses as part of a residential led development is supported.</p> <p>Specifically, the inclusion of retail uses such as a foodstore within the allocation policy would help to meet shopping requirements locally and contribute to creating a sustainable, mixed use development by meeting the needs of a new residential community at the Site. This would also reflect the existing and established land uses at the Site and enable sufficient flexibility for the delivery of an appropriate mix and quantum of land uses.</p> <p>We would also stress that LSIM would only support the emerging site allocation on the basis that it does not impact on the effective management of the current, established retail floorspace. As set out above, the redevelopment of the floorspace is only anticipated in the medium to longer term and the owner must retain the ability to asset manage the floorspace in advance of any longer term redevelopment.</p> <p>This would ensure that the Plan is positively prepared and will make the most effective use of previously developed land. Furthermore, it would enable any future development scheme to respond appropriately to market forces in terms of what is a viable and deliverable.</p> <p>The above matters will ensure that the emerging Local Plan is appropriately formulated to ensure the future development of the Site can be delivered in an appropriate manner, whilst allowing for reasonable flexibility.</p>	detrimentally impact on the operation of the current retail floorspace.	
LaSalle Investment Management (Savills obo)	3	LSA SA 10	<p>Summary and Conclusion</p> <p>LSIM intends to be a long term stakeholder in Lewisham and hopes to play an active role in its regeneration across the plan period.</p> <p>LSIM strongly supports the overall principles of redevelopment and regeneration that are emerging within the Local Plan. It also reiterates its strong support for the allocation of the Homebase / Argos site on Bromley Road within the emerging Local Plan, subject to the detailed considerations as set out above.</p> <p>LSIM would request that the Council acknowledges the commercial considerations that are integral to the realisation of policies. In respect of the Site on Bromley Road, LSIM is aligned with the Council’s aspiration to deliver comprehensive redevelopment of the site.</p> <p>However, for this objective to be realised, it will require a flexible approach in terms of densities and land uses. As set out above, such an approach is not discordant with local or national planning policy which both seek to optimise the potential of sustainable sites such as this.</p>	Support and comments noted. The Local Plan provides indicative site capacities. Optimal capacity for the site will be established at planning application stage through a design led approach.	No change.
Phoenix Community Housing (BPTW obo)	3	LSA SA 10	<p>We also wish to comment on specific site allocations as follows:</p> <p>■ 10 – Homebase, Bromley Road (South Lewisham)– PCH supports the allocation of this site for mixed-use development, including a significant quantum of genuinely affordable housing, though consider that the allocation as currently drafted does not sufficiently promote the heritage value of the site; particularly the grandiosity of its front façade and water feature.</p>	Support is noted. Disagree as the site allocation seeks to improve public realm and open space, including retention of the pond and	No change.

				enhance green infrastructure, including SINC, urban green space and public open space. The pond (designated SINC) in the eastern corner of the site, should form a key feature of the development and its biodiversity value should be enhanced. The front façade is not a designated heritage asset and the site may benefit from a full redevelopment of the site and reconfiguration of existing buildings.	
Tavern Propco (Savills obo)	- 3	General LSA SA 11	<p>Representations to the Lewisham Local Plan Regulation 18 (Main Issues and Preferred Approaches Document) Consultation</p> <p>Lewisham’s South Area Site Allocation 11: Downham Co-op These representations are submitted by Savills on behalf of our client, Tavern Propco, in response to the London Borough of Lewisham’s (LBL) Local Plan Main Issues and Preferred Approaches (Regulation 18) consultation.</p> <p>These representations supports the principle of the proposed Lewisham South Area Site Allocation 11: “Downham Co-op” (the Downham Co-op site allocation) for residential and town centre use of the site. Whilst supporting the principle of the allocation, this representation requests that the suggested use in the proposed allocation is maximised so that the development potential of the sustainably located site is utilised to deliver housing and viable town centre uses within Lewisham’s New Local Plan.</p> <p>Tavern Propco Tavern Propco is the owner of The Downham Tavern which is located within the boundary of the proposed Lewisham South Area Site Allocation 11: “Downham Co-op”.</p> <p>Executive Summary Tavern Propco is overall supportive of the Lewisham Local Plan Regulation 18 stage “Main Issues and Preferred Approaches” and its direction of travel, subject to modifications which Tavern Propco request to ensure the Local Plan and proposed Downham Co-op site allocation best maximises the development potential of the site.</p> <p>Structure of this Representation This representation provides a brief overview of the site and current and emerging policy designations. It request amendments are made to specified emerging policies.</p>	Support and comments noted.	No change.

Tavern Propco (Savills obo)	- 3	General LSA SA 11	<p>The Site</p> <p>The site is approximately 0.43 hectares in size. It is located west of Downham Way, north of Moorside Road and south of Capstone Road, in Bromley within south Lewisham. It currently comprises one single storey retail unit (Co-op Food) to the west of the site, one two-storey public house (Downham Tavern) to the north east of the site and a car park that occupies the central area of the site. Access is taken via Moorside Road along the southern boundary of the site.</p> <p>The site is very well located within the existing Downham Way local centre and surrounded by a mix of residential, retail and community uses. The surrounding properties are predominantly two storeys in height, with some three storey residential buildings interspersed. These include post-war terrace houses along Moorside Road (to the south) and Capstone Road (to the north) and a parade of retail units along Downham Way (to the east).</p> <p>Along Moorside Road there is also a medical practice and leisure centre and a primary school. The site is very sustainably located and is considered very suitable for mixed-use residential-led development. The majority of the site has a PTAL rating of 3 whilst the very southern boundary of the site along Moorside Road has a PTAL rating of 2. TfL’s WebCAT mapping indicates that the majority of the site will have a PTAL rating of 4 in the 2021 and 2031 forecast baseline for. This demonstrates that the site has very good access levels to public transport supporting it as a location for increased density of development and a suitable location for new housing and intensification of town centre uses.</p>	The supplementary information is noted.	No change.
Tavern Propco (Savills obo)	- 3	General LSA SA 11	<p>Existing Planning Policy Designations</p> <p>The site currently has three policy designations; Core Strategy Policy 6: <i>Retail Hierarchy and Location of Retail Development</i> and Development Management Policy 14: <i>District Centres Shopping Frontages</i> and Development Management Policy 20: <i>Public Houses</i>.</p> <p>Core Strategy Policy 6 seeks to only allow redevelopment of local shopping facilities where there is no economic demand for such services. Development Management Policy 14 states that the Council will only consider a change of use involving the loss of ground floor level shops where the proposal would meet specified criteria.</p> <p>Development Management Policy 20 seeks retain public houses unless they are financially unviable, vacant and there is other local provision.</p> <p>Requested Amendment: It is requested that the current planning policy designations are removed and that the Downham Co-op site is allocated for mixed use residential-led development as set out in the site’s proposes allocation, subject to modifications.</p>	Policies in the Local Plan, once adopted, will replace the policies in the Core Strategy and Development Management Local Plan. However, the site allocation will still require the retention or re-provision of the public house, alongside mixed-use redevelopment.	No change.
Tavern Propco (Savills obo)	3	LSA SA 11	<p>Emerging Planning Framework</p> <p>Lewisham Local Plan Regulation 18 (Main Issues and Preferred Approaches Document)</p> <p>Lewisham’s South Area Site Allocation 11: Downham Co-op</p> <p>Tavern Propco supports in principle the Downham Co-op site to be allocated for mixed-use development in Lewisham’s the new Local Plan.</p>	Support noted. Where no advanced pre-application discussions have taken place, the council has used a SHLAA based method to determine indicative site capacities – more details	No change.

			<p>The proposed site allocation is for a mixed-use redevelopment with compatible main town centre and residential uses. An indicative development capacity of 42 residential units and 1,440sqm of gross internal non-residential floorspace compatible with town centre uses.</p> <p>Residential Use at Lewisham’s South Area Site Allocation 11: Downham Co-op Tavern Propco strongly support the provision of residential development within the site allocation. However, it is considered that the proposed indicative development capacity of 42 units is conservative and does not best maximise the development potential of the site.</p> <p>In the context of making effective use of land, Paragraph 117 of the NPPF states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses. Paragraph 118 goes on to state that planning policies and decisions should encourage multiple benefits from both urban and rural land, including through mixed-use schemes, and should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs. Paragraph 118 goes on to set out that planning policies should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.</p> <p>In keeping with the principles of the NPPF, Lewisham’s Local Plan should be seeking to make effective use of suitable land, such as the Downham Co-op site, to boost housing supply. Lewisham’s South Area Site Allocation 11 comprised land that is a previously developed brownfield site in a highly accessible and sustainable location close to a wide range of existing services, facilities and amenities. Therefore, it is considered that the site’s indicative development capacity of 42 residential units does not fully utilise the development potential of the site.</p> <p>It is considered that a development capacity of 42 dwellings should be set as a minimum target and should be exceeded if all other planning considerations have been met, in accordance with national, London-wide and local aspirations.</p> <p>Requested Amendment: It is requested that the Downham Co-op site allocation is amended to state that the net residential units that development at the site should provide is “a minimum of 42 units subject to satisfactory design”.</p>	<p>can be found in the Ste Allocations Background Paper</p> <p>Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the need to re-provide retail uses and the public house, whilst introducing residential units and to reflect the surrounding character of the site. Based on these considerations, the land use mix and residential units have remained the same.</p> <p>Optimal capacity for the site will be established at planning application stage through a design led approach.</p>	
Tavern Propco (Savills obo)	- 3	General LSA SA 11	<p>Summary and Conclusions Tavern Propco is supportive in principle of the Lewisham’s South Area “Site Allocation 11: Downham Co-op” to be allocated for mixed-use residential-led development in Lewisham’s New Local Plan.</p> <p>It is requested that LBL amend Lewisham’s South Area Site Allocation 11: <i>Downham Co-op</i> to maximise the potential development capacity of the site. It is requested that the indicative net capacity of 42 residential units is set as a minimum target.</p> <p>With regards to proposed policies, it is requested that LBL amend Emerging Policy HO1: <i>Meeting Lewisham’s Housing Needs</i> to include the Standard</p>	Support and comments noted. Our response is set out above.	No change.

			<p>Methodology Housing targets and that Emerging Policy EC19: <i>Public Houses</i> is amended to better represent prevailing market conditions and to ensure that planning policies allow the optimum use of land over the Plan’s period.</p> <p>We would be grateful for confirmation of receipt of these representations. Please feel free to contact us in the first instance if you have any queries or would like to discuss.</p>		
McDonald’s Restaurants Ltd (Planware ltd obo)	3	LSA SA 13	<p>McDonald’s Restaurant, Old Bromley Road, Downham, Bromley, BR1 4JY</p> <p>Please take this letter as a formal objection to the proposed Local Plan Allocation 13, McDonald’s Ashgrove Road which seeks to allocate the site for mixed use development.</p> <p>We currently have no desire to redevelop this site and would not want to prejudice the provision of our drive-thru lane in this location.</p> <p>Whilst we acknowledge your aspirations for the wider area we would welcome the opportunity to meet with you to discuss the retention of our store.</p> <p>I look forward to hearing from you.</p>	The objection to developing this site is noted.	McDonalds Ashgrove Road ste allocation has been removed from the Plan.
The Cherwell Group (DP9 obo)	- 3	General LSA SA 14	<p>REPRESENTATIONS TO THE LEWISHAM LOCAL PLAN</p> <p>We write on behalf of The Cherwell Group who are the owners of Catford Police Station and are shortly to begin pre-application engagement with the Council on plans for the site.</p>	Comments noted.	No change.
The Cherwell Group (DP9 obo)	3	LSA SA 14	The site is included as a site allocation in the draft Local Plan and we fully support this approach.	Support noted.	No change.
The Cherwell Group (DP9 obo)	3	LSA SA 14	<p>We note that indicative development capacities have been included for the site. We consider that the evidence base is the appropriate location for the indicative capacities, and that they have the potential to be misinterpreted or misapplied as design briefs or effective constraints on what can be achieved on the site.</p> <p>There is the possibility to further optimise the development capacity of the site and without appropriate text we are concerned that the indicative development capacities could be used to constrain development potential.</p>	<p>Support noted. Where no advanced pre-application discussions have taken place, the council has used a SHLAA based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper.</p> <p>Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the need to protect the on-site designated heritage asset and to reflect the surrounding character. The indicative capacity has also been tested through the</p>	Catford Police Station site allocation amended by reducing residential capacity to 24 units and increasing employment/ main town centre floorspace to 1,072m².

				<p>A21 Development Framework that has been endorsed by the council.</p> <p>-Based on these considerations, the land use mix and residential units have been amended.</p> <p>Optimal capacity for the site will be established at planning application stage through a design led approach.</p>	
Phoenix Community Housing (BPTW obo)	3	LSA SA 14	<p>14 - Catford Police Station (South Lewisham) - PCH sees the potential for this site to make a significant contribution to genuinely affordable housing in Catford town centre, and so supports its allocation, however would strongly urge that the retention, adaptation and conversion of the front building be a requirement of the policy given its status as a locally important heritage asset and the most architecturally profound building in the vicinity. We would also point out that this site falls within the Central Area rather than South Lewisham.</p>	<p>The site allocation recognises the heritage value by stating that opportunities should be taken to investigate the viability for the adaptive re-use of the existing buildings which are non-designated heritage asset. There is also merit in referring to the adjacent locally listed Army Reserves.</p> <p>Disagree, as Catford Police Station site allocation is located in the South sub area.</p>	Catford Police Station site allocation amended to reference nearby locally listed heritage asset.
Notting Hill Genesis (Savills obo)	3	LWA 01	<p><i>Relates to Call for site</i></p> <p>Whilst NHG is generally supportive of the overall ‘direction of travel’ of the West Area place principles (LWA1), specifically Part A(e), which sets out that the Council will deliver new and improved workspace through colocation of employment and other compatible uses, the draft Local Plan is not consistent with national policy and the London Plan.</p>	<p>Comments noted.</p> <p>Disagree that the Local Plan is inconsistent with national and London Plan policy.</p>	No change.
Selkent Holdings (Daniel Watney LLP)	3	LWA 01	<p><i>Relates to Part 3, LWA SA 09</i></p> <p>Draft Policy LWA1 – West Area</p> <p>We welcome the recognition in Policy LWA1(D) that “<i>the comprehensive redevelopment of sites within Willow Way LSIS will be supported to enhance local employment provision as well as to improve the environmental and visual quality of the neighbourhood area. Development proposals within the LSIS should positively address the site’s relationship with Upper Sydenham / Kirkdale local centre, particularly to ensure compatible land-uses as well as safe and legible connections. Development should deliver high quality designs that help to establish a more cohesive, employment-led mixed use quarter.</i>”</p>	Support noted.	No change.

			<p>This recognition that Willow Way could be a vibrant, mixed-use quarter which will positively improve the Upper Sydenham / Kirkdale local centre is exciting and strongly supported.</p> <p>We agree that with appropriately designed schemes, there is an excellent opportunity to create a meaningful employment hub at Willow Way and also deliver significant amounts of residential accommodation, including affordable homes, and public realm.</p>		
(Simply planning obo)	- 3	General LWA SA 01	<p>London Borough of Lewisham – Regulation 18 Lewisham Local Plan Public Consultation</p> <p>MOT Centre, Shardeloes Road, Brockley, SE14 6RT</p> <p>Representations on behalf Mr Kadir Gencel and Mrs Kutlu Gencel</p> <p>These Representations are submitted on behalf of the owner of the MOT Centre, Shardeloes Road, Brockley ('the site') to the public consultation on the regulation 18 version of the draft Lewisham Local Plan. Our clients site forms part of site allocation reference SA30 '<i>Site at 111 & 115 Endwell Road (Timber Yard and Community College), Brockley Cross</i>' in the currently adopted Lewisham Site Allocations Local Plan (June 2013).</p> <p>The existing allocation in the currently adopted location plan states the allocation should be used for the following: <i>"Mixed use commercial/employment uses on the ground floor with housing above"</i></p> <p><i>LB Lewisham officer note: two maps are included in the original representation, both showing the boundary of the site in red and the clients land in green.</i></p>	Comments noted.	No change.
(Simply planning obo)	- 3	General LWA SA 01	<p>The above allocation is currently in multiple ownerships with the land to the south and west of our clients land being owned by the adjoining timber merchants. The land to the north of the site is occupied by a single storey church building, with a small area of the timber merchants beyond this.</p> <p>The allocation in the current Local Plan states that <i>"The Church itself is not proposed for redevelopment"</i> and so is clear that the allocation relates to our clients land and the timber merchants land only.</p> <p>On 19th March 2019 our client applied for planning permission on the site under application reference DC/19/110715 for the following development: <i>"Demolition of the existing single storey buildings on the site at R L Watson and Son, Shardeloes Rd, SE4 and construction of a part one/part two storey building to provide an MOT Centre facilities"</i></p> <p>Planning permission was granted for the above development on 15th May 2019 and development has commenced at the site. Following the granting of planning permission it is our client's intention to seek a further planning permission for additional storeys to be added to the MOT Centre to provide residential units above. We are in the process of preparing a pre-application enquiry to be submitted to the London Borough of Lewisham to seek your advice ahead of the submission of the planning application.</p>	Comments noted.	No change.

(Simply planning obo)	- 3	General LWA SA 01	We would welcome and opportunity to discuss the allocation and will be progressing a pre-application enquiry for residential development at the site imminently, which we hope will assist in demonstrating to the Planning Inspectorate that the retained allocation remains viable and deliverable during the next plan period.	Comments noted.	No change.
(Simply planning obo)	3	LWA SA 01	<p>In the regulation 18 version of the draft Lewisham Local Plan, the existing 111 & 115 Endwell Road allocation is proposed to be retained as part of the new Local Plan, including our clients land. The wording for the allocation in the draft Local Plan has been amended slightly to the following: <i>“Employment led mixed-use redevelopment with compatible commercial, community and residential uses.”</i></p> <p>We welcome the wording for this allocation, as it continues to fit with our aspirations for residential development on the upper floors above the MOT Centre. The exact yield for the number of units will be determined during pre-application engagement with the Local Planning Authority.</p>	Support noted.	No change.
(Simply planning obo)	3	LWA SA 01	<p>Having reviewed the detailed wording for the allocation on pages 754 to 755 of the Local Plan, we would suggest a couple of minor alterations to the allocation. The first relates to the development guidelines on page 755 and we would suggest a fifth bullet point is added to state the following: <i>“Given the multiple ownerships of the site, a phased development of the allocation would be acceptable. Any earlier phase of development must show compliance with Policy QD1 ‘Delivering high quality design in Lewisham’ and also demonstrate how it would not prejudice the delivery of the wider site allocation”</i></p> <p>Paragraph 59 of the NPPF confirms the government’s objective of significantly boosting the supply of new homes. Our client site can provide a small increase to the housing land supply and this can be delivered immediately in a way which will not undermine the wider site allocation. Therefore, the allocation should provide clarity that a phased development of the allocation would be permitted, to allow the early delivery of housing on our clients land.</p> <p>In conclusion, our clients are very keen to redevelop their land to provide additional residential units above, which complies with the current and draft Site Allocation Plan. Therefore, we are keen to support the revised Local Plan but would request an addition to the wording of the allocation to allow the early delivery of housing at our clients site, on the basis that this will not prejudice the wider allocation of the land to the west and south.</p>	Disagree with wording proposed but recognise that masterplanning, phasing and working in partnership should be acknowledged.	111-115 Endwell Road site allocation amended to reference masterplanning and partnership working.
(Simply planning obo)	3	LWA SA 01	<p>A second suggested amendment is that the site allocation boundary should be amended. The wording of the current allocation makes clear that the church to the north of our site is not intended for development. Unless the church have advised that they wish for the site to be redeveloped, then the allocation should be amended to ensure the whole allocation is considered to be deliverable, meaning the church site is deleted from the allocation.</p> <p><i>LB Lewisham officer note: a map is included in the original representation showing a suggested boundary revision marked by an orange line.</i></p> <p>The above revised allocation would retain the land in the ownership of our client and the timber merchants, which must be considered the only deliverable</p>	Agree that the church plot should be removed from the site allocation.	111-115 Endwell Road site allocation amended by removing the church plot from the site allocation boundary.

			<p>allocation if the Church have never advised the Council that they wish to redevelop their land.</p> <p>We would also suggest that the boundary of the site allocation be amended to ensure the land included within the allocation can be considered as deliverable, as required by paragraph 67 of the NPPF.</p>		
M&D Enterprises Ltd (March Design Associates obo)	- 3	General LWA SA 02	I was passed on your consultation document on site review, attached and instructed to respond on behalf of the owners M&D Enterprises Ltd for whom we have acted for over many years.	Comments noted.	No change.
M&D Enterprises Ltd (March Design Associates obo)	- 3	General LWA SA 02	<p>We therefore hope this will be taken into account in your final Local Plan draft and hopefully adopted version in due course. As is said in these parts, you know it makes sense.</p> <p>The owners are always happy to discuss and if a wholly residential scheme is acceptable, then the prospects of this site coming to fruition in the near future is highly probable.</p>	Comments noted.	No change.
M&D Enterprises Ltd (March Design Associates obo)	3	LWA SA 02	<p>This site was allocated as SA28 in previous Local Plan and owners wish for it to remain as a possible development opportunity.</p> <p>In the interim period efforts were made to secure planning permission, which was thwarted by your Design Panel at a time of transition from the previous voluntary panel to the new 'paid' panel and this site got up in the cross fire and in my opinion unreasonably so. The adjacent site to the north had been redeveloped, whilst the one to the south was about to commence, both of incredible mediocrity and yet the latter was cited as exemplar standard, when built it is very bland. Consequently the scheme was mothballed but may be reconsidered soon but could be enhance if a pragmatic designation is applied.</p>	Comments noted.	No change.
M&D Enterprises Ltd (March Design Associates obo)	3	LWA SA 02	The new London Plan emphasises 'Design Led Approach' and this site meets the small sites category where PTAL is no longer a consideration. Furthermore this has been a skip-yard for many years, and now only used for plant storage. There was a temporary permission for a housing office for local framework delivery, that has long since ceased and reverted to mainly skip storage. Given the demise of commercial ground floor space, particularly since Covid, where secondary retail space will in even less demand, then insistence for a non-residential use on ground floor should be removed and the site go forward as a wholly residential scheme. The retention of a ground floor non-residential use is a liability which prevents redevelopment and if retained is likely to remain as a voided shell like many others in the locality. The Policy consideration needs to waken up to this reality for secondary parades – in this case with low and incompatible commercial use with virtually zero employment status – to free up scope for better and more residential use in highly sustainable locations such as this right on the station with good bus routes nearby.	Disagree that commercial uses should be dropped from the site, given it's location within the local centre and proximity to the railway station Other developments on both sides of the station have operational ground floor non residential uses.	No change.
M&D Enterprises Ltd (March Design Associates obo)	3	LWA SA 02	Owners are happy to include level access to platform as a community / infrastructure benefit with good public realm landscaping. This inclusion should be considered as a requisite gesture to benefit all especially disabled people and therefore other commercial aspects to be dropped in favour of good cycle, refuse and ground floor circulation / entrances as way forward.	Agree that access to the platform will be of benefit. The site allocation already includes the need to improve legibility and safe access to the station entrance from the western	No change.

				side of the railway. Disagree that commercial uses should be dropped from the site.	
Dolphin Living Group (CMA Planning obo)	- 3	General LWA SA 04	LEWISHAM DRAFT LOCAL PLAN – REGULATION 18 STAGE, JANUARY 2021 REPRESENTATIONS ON BEHALF OF DOLPHIN LIVING GROUP IN RESPECT OF ‘MAIN ISSUES AND PREFERRED APPROACHES’ DOCUMENT We write on behalf of Dolphin Living Group in response to the local planning authority’s draft Local Plan, which was published on 15th January 2021 for consultation pursuant to Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.	Comments noted. Our response is set out below.	No change.
Dolphin Living Group (CMA Planning obo)	- 3	General LWA SA 04	Dolphin Living have land interests within the London Borough of Lewisham, in particular a site on Honor Oak Road in Forest Hill, which forms part of “West Area Site Allocation No.4” within the draft Local Plan. Dolphin support the principle of the site being allocated for housing; however, for the reasons set out below, we consider that the draft allocation fails to properly reflect the site’s development opportunities such that the indicative development capacity in the Plan should be significantly increased.	Comments noted. Our response is set out below.	No change.
Dolphin Living Group (CMA Planning obo)	- 3	General LWA SA 04	We hope that these representations will provide a useful contribution to policy formation and would welcome further dialogue with the Council on this matter as drafting of the new Local Plan progresses, so as to ensure that the Site Allocation promotes rather than restrains the delivery of new homes on this key site.	Comments noted. Our response is set out below.	No change.
Dolphin Living Group (CMA Planning obo)	- 3	General LWA SA 04	Dolphin Living Dolphin Living is an affordable housing charity formed in 2005 and initially funded through gifts from the Dolphin Square Trust from the sale of Dolphin Square in Pimlico. Dolphin Living’s primary charitable objective is to support London’s workers on modest incomes who cannot afford housing near to their place of work. This is fulfilled through the provision of homes to rent at below market levels. In 2021 79% of their 799 homes were available for intermediate rent at an average discount of 40% to the local market rent. Dolphin Living house those who make London work and with whom London is better place to live and work. The Site In 2016 Dolphin Living acquired the site known as Havelock House and The Hermitage, Honor Oak Road, Forest Hill, London, SE23 3SA. The site is made up of two distinct elements; the first element is Havelock House, which comprises 2 x 4 storey and 1 x 3 storey blocks of flats that sit within landscaped grounds; the second element is 5 x 2 storey, 2 bedroom houses on The Hermitage, which lie immediately to the rear (north-west) of Havelock House. The Havelock House buildings are set back from Honor Oak Road this element of the site is bounded by the side of the 2 storey semi-detached house at 46 Honor Oak Road and the rear of the 2 storey detached houses at 1 and 3 Horniman Drive to the north; by an area of open grassland and the 2 storey houses on The Hermitage to the west; by the 4 storey block of flats with rear car park at 60 Honor Oak Road to the south, and; by the public highway on Honor Oak Road to the east.	The supplementary information is noted. Our response is set out below.	No change.

			<p>The Hermitage element of the site is bounded by an area of grassland and shrubbery to the rear of the 3 storey block of flats known as Baxter House, Horniman Drive, and a telecommunications mast an ancillary building to the north and west; by the detached 2 storey house at 4 The Hermitage to the south, and; by the Havelock House buildings and grounds to the east. In terms of the local topography, the site sits on a slope, which rises from Honor Oak Road to Havelock House to The Hermitage.</p> <p><i>LB Lewisham officer note: Figure 1.1 Aerial Photograph of the Site is included in the original representation. The photograph shows the site boundary in red.</i></p> <p>The surrounding area is residential in character, comprising 2 to 3 storey semi-detached and terraced houses, 2 storey detached houses and 3 to 4 storey blocks of flats. The quality of the building stock in the area is varied, with many of the detached and semi-detached houses dating from the mid-twentieth century, although a number of attractive Victorian villas survive within the area, together with a handful of Georgian buildings. Whilst most of the purpose-built flatted blocks appear to date from the 1950-60s, there are some examples of more recent development, including small blocks of flats that appear to date from the 1990s and early 2000s.</p> <p>In terms of local amenities, the site lies approximately 400 metres to the north-west of the Forest Hill District Centre, which includes a range of local shops, cafes and restaurants and a large Sainsbury's supermarket. The site also lies 110m metres to the east of the Horniman Primary School.</p> <p>Whilst the site itself is not located within a Conservation Area, the boundary of the Forest Hill Conservation Area lies a short distance to both the east and south of the site. The detached 2 storey Regency villa with raised basement known as Asherby Cottage, 62 Honor Oak Road, and adjacent two storey Georgian house known as Hill House, 64 Honor Oak Road, which lie immediately to the south of the site, are both Grade II listed. Both buildings are treated as a group for the purpose of the listing and both lie within the Forest Hill Conservation Area. The Historic England listing descriptions for both buildings have been appended to this note.</p> <p>In terms of local access to public transport, the site lies 500 metres to the north-west of Forest Hill Station, which is served by both National Rail and London Overground services. In addition, London bus services operate along Honor Oak Road, with a bus stop located immediately adjacent to the south-east corner of the site that is served by the P4 bus route, which runs between Lewisham town centre and Brixton. As a result the site has a good Public Transport Accessibility Level (PTAL) of 3-4, on a scale from 0 to 6b where 0 is very poor and 6b is excellent.</p>		
Dolphin Living Group (CMA Planning obo)	3	LWA SA 04	<p>Lewisham Draft Local Plan</p> <p>The Lewisham Draft Local Plan 'Main Issues and Preferred Approaches' document was published for consultation in January 2021, pursuant to Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Part Three of the draft Local Plan sets out emerging policies and Site Allocations for each of Lewisham's key 'Areas'.</p>	Comments are noted.	Havelock House, Telecom Site and Willow Tree House site allocation has been removed from the Plan.

		<p>The Havelock House and The Hermitage site lies within Lewisham’s West Area and forms part of draft Site Allocation No.4 ‘Havelock House, Telecom Site and Willow Tree House, near Horniman Drive’, which allocates the site for ‘redevelopment of backland site for residential use.’</p> <p>Draft Site Allocation No.4 provides an indicative development capacity of 30 net (i.e. additional) residential units. The Site Allocation area presently includes 23 residential units, all of which are within the Havelock House and The Hermitage site, and the total indicative site capacity (i.e. existing plus net additional) is therefore 53 homes. The Site Allocation covers an area of 1.48 hectares (ha) and the 53 home capacity equates to a density of approximately 36 units per hectare (u/ha).</p> <p>The previous version of the London Plan (2016) included a Sustainable Residential Quality (SRQ) Matrix that set out target density ranges for development with different settings and different Public Transport Accessibility Levels (PTALs). The SRQ Matrix was a relatively crude tool that was designed to support the delivery of new homes in order to meet the previous London Plan (2016) housing targets.</p> <p>As set out below, the new London Plan (2021) sets out higher housing targets, which reflect the pressing need to intensify and densify new housing developments in sustainable and accessible locations in order to meet London’s housing needs. To support the delivery of these new, higher housing targets, the SRQ Matrix has effectively been replaced by London Plan Policy D3, which seeks to optimise site capacity through a design-led approach.</p> <p>Whilst the SRQ Matrix no longer has any weight in policy terms, it remains a useful yardstick for density calculations. In this regard it is relevant to note that the SRQ Matrix provides an indicative density range of 45-170u/ha for sites with an ‘Urban’ setting with a PTAL of 2-3, such as Havelock House and The Hermitage.</p> <p>Whilst not determinative in and of itself, the SRQ Matrix nonetheless provides a clear indication that the indicative development capacity for Site Allocation No.4 (which equates to 36u/ha (gross)) would amount to under-development of a sustainable and accessible brownfield urban site.</p> <p>The Lewisham Local Plan Site Allocations Background Paper (January 2021), which forms part of the evidence base for the draft Local Plan, sets out how the indicative site capacities have been calculated at Section 6 of the document. Subsection 4 (‘all other sites’) states that for sites where there is no existing planning consent, current pre-application proposals, or masterplan study, the starting point for establishing the indicative capacity has been informed by the use of a standard methodology, based on the density assumptions used in the London-wide SHLAA (2017) methodology.</p> <p>Table 6.1 in the document sets out the London-wide SHLAA density assumptions, which for ‘Urban’ sites with a PTAL of 2-3 (such as Havelock House and The Hermitage) provides an indicative density of 170u/ha. This broadly tallies with the SRQ Matrix referred to above, which suggests a target density range of 45-</p>		
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			<p>170u/ha for sites with these characteristics, which would equate to between 67 and 252 dwellings for the allocation as a whole.</p> <p>Subsections 5 to 7 of the document go on to explain that sites considered under (4) were then subject to a sense-check exercise to assess whether the baseline capacity figures were feasible and appropriate to the site context. It appears that this sense-check exercise has resulted in the indicative capacity of Site Allocation No.4 being reduced from 170u/ha to 36u/ha, which is a 79% reduction.</p> <p>As with almost all urban brownfield sites, the Havelock House and The Hermitage site is subject to a number of development constraints, including proximity to neighbouring residential properties, mature trees within the site, site topography, prevailing building heights, and two nearby listed buildings. However, such constraints are common both within London generally and within Lewisham and it is not considered that these constraints are prejudicial to the extent that they would result in a 79% reduction in the indicative site capacity from that provided by the SHLAA density assumptions.</p> <p>Accordingly, Dolphin Living have commissioned Corstorphine + Wright Architects to prepare a development feasibility study for the Havelock House and The Hermitage site.</p> <p><i>LB Lewisham officer note: A Site Analysis and Development Feasibility Study is included in the original representation.</i></p> <p>The study includes contextual analysis of the site and its surroundings and sets out the site-specific development opportunities and constraints at Sections 2.3 and 2.4.</p> <p>The study then provides an illustrative masterplan for the site, which directly responds to the site’s local context, opportunities and constraints, and demonstrates that the Havelock House and The Hermitage site (i.e. part of the overall allocation) is capable of accommodating approximately 110 homes within a contextually appropriate development scheme.</p> <p>We would ask that the Council takes into account the findings of the study as the drafting of the Local Plan progresses and would welcome further dialogue with the Council on matters pertaining to the development capacity for Site Allocation No.4.</p>		
Dolphin Living Group (CMA Planning obo)	3	LWA SA 04	<p>Wider Policy Context</p> <p>The pressing requirement to deliver new homes in order to meet housing needs is enshrined in all levels of planning policy. At a national level, Paragraph 59 of the National Planning Policy Framework (NPPF) states:</p> <p><i>“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”</i></p> <p>At a regional level, London Plan Policy H1 (Increasing Housing Supply), Part A, advises that each local authority should plan in order to meet and exceed its ten</p>	The site allocations in the Local Plan when combined together seek to meet the London Plan housing annual target of 1,667 homes.	No change.

			<p>year housing completions targets. These targets are set out in Table 4.1, which for Lewisham is 16,670 new homes over a ten year period, which equates to an annual target of 1,667 homes. This represents a 20% increase on the borough's previous London Plan (2016) annual target of 1,385 new homes.</p> <p>The Borough's most recently published Annual Monitoring Report (2019/2020) shows a projected five year housing supply of 7,359 homes for years 1-5 (which equates to an average annual supply of 1,472 homes), with supply then falling in years 5-10 and 11-15. This presents a significant challenge for the Borough as projected housing supply is markedly below the Borough's new London Plan housing target.</p> <p>It is therefore imperative that the Borough, through the plan making process, facilitates an increase housing delivery through identifying and allocating suitable sites for new housing at appropriately optimised capacities/densities.</p> <p>London Plan Policy H1, Part B goes on to state that in order to ensure that the ten year housing targets are achieved, boroughs should, <i>inter alia</i>, optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary.</p> <p>This is of particular relevance as Havelock House and The Hermitage has a PTAL of 3-4 and is located just 400m from Forest Hill District Centre and 500m from Forest Hill Station. As such, there is a strong policy presumption in favour of optimising housing delivery on this sustainable and accessible brownfield site.</p> <p>Taking into account the above NPPF and London Plan policy objectives and requirements, it is clear that there is an urgent need for the Council, through the preparation of its new Local Plan, to support and promote the optimisation of housing delivery on sustainable, accessible brownfield sites, such as Site Allocation No.4, in order to meet its housing targets.</p> <p>As currently drafted, the indicative site capacity would serve to constrain housing delivery and must be increased to reflect the development potential of the site and to align with national and regional policy.</p>		
Dolphin Living Group (CMA Planning obo)	3	LWA SA 04	<p>GLA Draft Good Quality Homes for All Londoners Guidance</p> <p>In October 2020 the Mayor of London published his Good Quality Homes for All Londoners Guidance for consultation. This Guidance document has been prepared by the GLA with input from a team of specialist consultancies, including CMA Planning. It is anticipated that the final Guidance will be formally published as Supplementary Planning Guidance (SPG) to the new London Plan in Summer 2021, to replace the current (i.e. 2016) Housing SPG. The draft guidance can be downloaded from the GLA's website at: https://consult.london.gov.uk/good-quality-homes-for-all-londoners</p> <p>The draft Guidance includes four 'Modules', the first of which is Module A, which provides guidance in relation to meeting the over-arching objectives and policy requirements of London Plan (2021) Policy D3 (Optimising Site Capacity through the Design-led Approach). Specifically, Module A advocates a design-led</p>	Comments relating to the Good Quality Homes SPD and the feasibility study are noted.	No change.

			<p>methodology for optimising site capacity at the plan-making stage. It is aimed at borough policy officers when calculating capacity on strategic and non-strategic site allocations. It sets out an approach to assessing sites’ suitability for development and offers a tool for assessing site capacity, which is provided within Module A.</p> <p>The enclosed feasibility study has been prepared with reference to the guidance provided in Module A and the accompanying Site Analysis Using Capacity Factors document sets out the capacity factors that have informed the indicative masterplan scheme. We would ask that the Council takes the GLA draft Guidance into account when preparing the Regulation 19 version of the draft Local Plan.</p>		
Dolphin Living Group (CMA Planning obo)	3	LWA SA 04	<p>In conclusion, it is considered that the draft Local Plan as currently worded would unnecessarily limit the delivery of new homes within a Site Allocation for new housing.</p> <p>Accordingly, Dolphin Living object to the current drafting of Site Allocation No.4 ‘Havelock House, Telecom Site and Willow Tree House, near Horniman Drive’ and would ask that the Council increases the indicative development capacity for this key site in order to more closely reflect the site’s development potential, and to more closely align with national and regional policy, which seek to significantly increase housing delivery.</p>	Objection noted. Our response is set out above.	No change.
UD Urban Development	3	LWA SA 05	<p>We apologies for the delay in submitting our documentation. Events related to the current health crisis caused serious disruption at the last moment.</p> <p><i>LB Lewisham officer note: The following documents were also attached, alongside this representation:</i></p> <p><i>Site Location Plan</i></p> <p><i>Site Location Masterplan</i></p> <p><i>9-13 The Façade, Forest Hill Masterplan</i></p> <p><i>Correspondence relating to pre-app advice for 9-13 The Façade</i></p> <p><i>Proposed Floorplans, sections and elevations of 9-13 The Façade</i></p> <p>Our Proposed Site address is:</p> <ul style="list-style-type: none">9-13 The Facade (and associated masterplan properties) <p>Forest Hill London SE23 3HA</p> <p>We propose that the above site masterplan proposals, which encompass a large part of Lewisham’s Reg. 18 (Forest Hill Station & Forecourt) be included within your local plan.</p> <p>The masterplan proposals illustrate how Lewisham’s ambitions for a redeveloped Station area can be realised without the need for compulsory purchase.</p> <p>The plans demonstrate how each site can be developed independently without compromising the integrity of the overall scheme.</p> <p>Also included are proposals for 9-13 The Facade, which forms the western-most piece of the masterplan site. They are included to demonstrate the deliverability of a part of the overall scheme.</p>	. The masterplan proposals and supplementary information relating to 9-13 The Façade is noted.	Land at Forest Hill Station West site allocations amended by making reference to masterplanning and landowners working in partnership.

Selkent Holdings (Daniel Watney LLP)	- 3	General LWA SA 09	<p>LB Lewisham Local Plan – Regulation 18 Version</p> <p>Written Representation, Selkent Holdings</p> <p>This letter of representation has been prepared on behalf of our client, Selkent Holdings, in response to the Regulation 18 draft version of the LB Lewisham Local Plan issued for consultation earlier this year.</p> <p>Our client is a private landowner within the Borough, owning the site known as 12-24 Willow Way, SE26.</p> <p>These representations set out our support for the general emerging policy position in respect of land use and the site allocation encompassing our client’s site, however does highlight some concerns with the Regulation 18 version of the Plan as currently drafted.</p>	Support and comments noted. Our response is set out below.	No change.
Selkent Holdings (Daniel Watney LLP)	- 3	General LWA SA 09	<p>We do however raise some concerns about the specifics of the site allocation and the impact this could have on our client’s land ownership and aspirations for redevelopment.</p> <p>We request that these elements are reviewed through the next draft of the Plan to retain sufficient flexibility within the allocation and allow the site capacity to be optimised.</p> <p>Site Description and Summary</p> <p>Our client owns the freehold of a two-storey commercial building at 12-24 Willow Way, SE26 which forms part of the wider commercial site known as Willow Way.</p> <p>The site is currently designated as a Local Employment Location within LBL’s adopted policy documents, with emerging policy seeking to re-designate this as a Locally Significant Industrial Site (LSIS).</p> <p><i>LB Lewisham officer note: the Allocation Map is included in the original representation. It is reproduced with outline in red, and the client’s site edged crudely in blue for context.</i></p> <p>The site lies to the immediate north / north-east of a cleared parcel of land owned by LB Lewisham and to the immediate south of privately owned land comprising a small industrial unit, an MOT garage and The Bricklayers Arms Public House.</p> <p>The eastern half of Willow Way is also characterised by small scale industrial units and open yard space whilst the former police station is currently being redeveloped at the north-eastern end of Willow Way.</p> <p>Willow Way joins on to Dartmouth Road to the north and Kirkdale to the south-west. Its built form is typical of the industrial nature of the immediately surrounding area however Kirkdale and Dartmouth Road provide retail accommodation at ground floor with residential above, typical of its position as a local centre.</p> <p>The site enjoys a Public Transport Accessibility Level (PTAL) rating of 4, on a scale of 0 to 6b where 6b is the highest. Flood risk mapping shows that the site lies</p>	The supplementary information is noted. Our response is set out below.	No change.

			<p>within Flood Zone 1 representing the lowest flood risk. Additional mapping shows it is at a very low risk of tidal, fluvial and surface water flooding – while Willow Way itself features some risk of surface water flooding.</p> <p>As mentioned above, the site falls adjacent to a currently cleared site which formerly housed a council depot and, more recently, a temporary school site. This is owned by the council and our client has recently engaged with LB Lewisham’s planning department in respect of the proposed mixed-use redevelopment of the two sites combined to re-provide high quality commercial floorspace alongside residential accommodation above. A meeting with Officers was held in January 2021, with formal written advice being received in February 2021.</p> <p>This meeting was broadly positive in respect of the principles of an employment-led, mixed use scheme on the combined site, recognising the position of the newly adopted London Plan and the direction of travel of the draft Local Plan. Officers raised caution over the wider Willow Way allocation and ensuring that our client as landowner sought to feed into the progression of the Local Plan.</p> <p>The following sections discuss those policies of relevance and our comments and observations at this stage of the plan evolution.</p>		
Selkent Holdings (Daniel Watney LLP)	- 3	General LWA SA 09	<p>We welcome the opportunity to engage on this exciting and evolving policy shift which supports the employment led, mixed use redevelopment of our client’s site, however we hope that the contents of this letter of representation sufficiently explain our reservations over part of the Plan as currently drafted.</p> <p>I trust that the contents of this letter sufficiently clear, however we would welcome further engagement to discuss these concerns. If you have any queries at all, please do contact me.</p>	Comments noted. Our response is set out below.	No change.
Selkent Holdings (Daniel Watney LLP)	3	LWA SA 09	<p>In summary, Selkent Holdings welcome the allocation of their site as part of a wider parcel of land within the Willow Way site allocation and support the position throughout the Plan for employment-led, mixed use redevelopment of the site in line with the principles of co-location.</p> <p>This echoes the pre-application process that our client has gone through recently alongside their neighbouring landowner, LB Lewisham, to assess the development potential of both sites combined to deliver substantial employment floorspace alongside residential accommodation and public realm.</p>	Support noted. Our response is set out below.	No change.
Selkent Holdings (Daniel Watney LLP)	3 3	LWA SA 09 Para 18.49 and para 18.50	<p>Site Allocation – West Area ‘9’</p> <p>In terms of Lewisham’s West Area Site Allocations, the Willow Way LSIS is allocated at ‘9’, as extracted below.</p> <p><i>LB Lewisham officer note: an extract of the site allocation boundary map and corresponding table for Willow Way site allocation is included in the original representation.</i></p> <p>The allocation is for the below, as identified through Paragraph 18.49: <i>“Comprehensive employment led mixed-use development. Co-location of compatible commercial, main town centre and residential uses. Reconfiguration of buildings and spaces to facilitate a new layout with new and improved routes,</i></p>	<p>The Local Plan provides indicative site capacities. Disagree that “minimal development capacity” should be used.</p> <p>Where no advanced pre-application discussions have taken place, the council has used a SHLAA based method to determine indicative site capacities – more details</p>	No change.

			<p><i>both into and through the site along with public realm and environmental enhancements.”</i></p> <p>Paragraph 18.50 of the draft Plan identifies the Willow Way opportunities as being: <i>“The site comprises the Willow Way Locally Significant Industrial Site, which is located adjacent to Upper Sydenham / Kirkdale local centre and spans both sides of Willow Way. The site includes vacant land and a mix of lower density employment uses.</i> <i>Redevelopment and site intensification, along with the co-location of commercial and other uses, will provide a more optimal use of land and enable the delivery of new and improved workspace to support the long-term viability of the LSIS. Development will also enable public realm enhancements to improve the quality of the townscape around the local centre, and help to make the area a safer and more attractive place for business and community activity”</i></p> <p>The approach of allocating the site as part of a wider parcel of land for redevelopment is strongly supported, as is the aspiration to create a new employment hub at this location alongside the delivery of much needed residential accommodation.</p> <p>The wider 1.29 hectare site is identified as having a development capacity of circa 6,700 sqm of employment space alongside 175 residential units. In terms of residential capacity per hectare, this would result in a density of 135.6 units per hectare. Whilst there is no longer a density matrix through the new London Plan, this is a conservative density for the site which would broadly be considered an urban location and benefits from a high PTAL rating of 4.</p> <p>We would contend that a greater density would be appropriate across this large, sustainable, brownfield site and that a density of 250-300 units per hectare would be more appropriate as a minimum and that even higher densities could be supported subject to demonstrating that there is a high quality of design.</p> <p>Whilst the table only recognises an indicative development capacity, we believe this should be altered to read ‘minimum development capacity’ to promote the optimisation of the site capacity in line with draft Policy QD6 and the approach taken within that policy.</p> <p>If the ‘minimum’ approach is not taken, then the ‘indicative’ approach should be increased to a higher density across the site. Applying 250-300 units per hectare would achieve an indicative development capacity of 322 – 387 units across the wider site.</p>	<p>can be found in the Ste Allocations Background Paper</p> <p>Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the need to provide employment uses whilst introducing residential units and to reflect the surrounding character of the site. Based on these considerations, the land use mix and residential units have remained the same.</p> <p>Optimal capacity for the site will be established at planning application stage through a design led approach.</p>	
Selkent Holdings (Daniel Watney LLP)	3 3	LWA SA 09 Para 18.51	<p>Paragraph 18.51 details the development requirements for the Willow Way allocation which we address in turn:</p> <ul style="list-style-type: none"><i>“All proposals must be delivered in accordance with a masterplan to ensure the appropriate co-location of employment and other uses across the site. This must address the site’s relationship with the Upper Sydenham / Kirkdale local centre, to improve the functional relationship with neighbouring uses and the public realm, along with townscape character”.</i>	<p>Support is noted. Agree that more clarity on “no net loss of industrial capacity” is needed. Supplementary text to Policy EC2 Protecting employment land and delivering new workspace</p>	<p>Willow Way LSIS site allocation amended in relation to masterplanning for sites with multiple ownerships and by providing clarity in relation to net loss of industrial capacity.</p>

			<p>We have outlined the general principles of masterplanning above within this letter and would reinforce our position also stands in respect of this development requirement for Willow Way.</p> <ul style="list-style-type: none">• <i>“Development must not result in a net loss of industrial capacity, or compromise the functional integrity of the employment location, in line with Policy EC 5 (Locally Significant Industrial Sites)”</i>. <p>We accept this statement regarding the net loss of industrial capacity. There is no definition contained within the plan about what constitutes ‘capacity’ and whether this relates to net floorspace or allows for qualitative arguments to be made about the capacity.</p> <p>A no net loss position would not adhere to the new London Plan as this element was amended during the Examination process to remove any reference to ‘no net loss’ of floorspace. We request that capacity is defined through a future iteration of the plan to confirm this does not relate explicitly to existing floorspace.</p> <ul style="list-style-type: none">• <i>“Positive frontages along Willow Way, Dartmouth Road and Sydenham Park, with active ground floor frontages. Positive frontages elsewhere throughout the site, where new routes are introduced”</i>. <p>This is welcomed and we believe positive and active frontages will be a significant public benefit to redevelopment on this wider allocation. This could be in the form of active residential frontages, active commercial / industrial frontages or retail uses and public realm provision.</p> <ul style="list-style-type: none">• <i>“The site must be fully re-integrated with the surrounding street network to improve access and permeability in the local area. This includes a clear hierarchy of routes, with a legible and safe network of walking and cycle routes, through the site. Particular consideration must be given to the access and servicing arrangements for commercial uses”</i>. <p>This is welcomed and supported.</p> <ul style="list-style-type: none">• <i>“Delivery of new and improved public realm and open space, in accordance with a site-wide public realm strategy”</i>. <p>This is welcomed and supported.</p>	<p>provides clarity on the net loss of industrial capacity. Table 8.3 also provides a formula for calculating financial contributions for the loss of industrial capacity. The Plan should be read as a whole.</p>	
Selkent Holdings (Daniel Watney LLP)	3 3	LWA SA 09 Para18.52	<p>Paragraph 18.52 of the draft Local Plan details the development guidelines which we address in turn:</p> <ul style="list-style-type: none">• <i>“Non-employment uses, including residential uses, must be sensitively integrated into the development in order to ensure the protection of amenity for all site users, along with safe and convenient access. This will require careful consideration of the operational requirements of existing and potential future employment uses”</i>. <p>This is acknowledged and of course is a fundamental requirement of any co-location scheme to comply with the agent of change principles set through the</p>	<p>Support is noted. Disagree that reference to a new route should be removed from the Plan. The text states proposals will be <i>expected to investigate, and where feasible</i>, deliver a new route.</p> <p>Disagree that the reference to the former Sydenham</p>	No change.

			<p>new London Plan and ensure that the amenity of existing and future commercial and residential occupants is not compromised.</p> <ul style="list-style-type: none">• <i>“Main town centre uses may be acceptable but these must be ancillary to the commercial uses and not detract from viability of the local centre”.</i> <p>This is noted and accepted.</p> <ul style="list-style-type: none">• <i>“Enhanced permeability off Willow Way will be an essential element of the design. Proposals will be expected to investigate, and where feasible, deliver a new route(s) linking from Willow Way to Kirkdale and Dartmouth Roads”.</i> <p>This is accepted in principle but given the lack of any direct access to Kirkdale through the allocation, other than the existing Willow Way route, this element would be difficult to secure. Improvements to the existing road and pavement can no doubt be delivered through public realm improvements but additional routes are unlikely to be achievable.</p> <ul style="list-style-type: none">• <i>“Additional planting and landscaping should be integrated to enhance the public realm and encourage movement by walking and cycling along Willow Way”.</i> <p>This is supported.</p> <ul style="list-style-type: none">• <i>“Development should provide for a coherent building line along Willow Way, taking into account the redevelopment of the former Sydenham Police Station site”.</i> <p>This is noted and understood. The reference to the former police station should not be ambiguous in terms of heights however as a relatively modest 3-4 storey building. The Willow Way site has the potential to achieve greater height towards the centre where there are less sensitivities on neighbours.</p> <ul style="list-style-type: none">• <i>“The design of development must respond positively to the local context, giving particular consideration to heritage assets, including the Sydenham Park Conservation Area, Halifax Street Conservation Area, Jews Walk Conservation Area, Area of Special Local Character, as well as listed building and locally listed buildings along Kirkdale”.</i> <p>This is noted and accepted.</p>	Police Station site should be removed.	
Manak Homes	3	LWA SA 10	<p>I am contacting you in relation to your consultation on the proposed site allocation located at ‘Land at Forest Hill Station east (Waldram Place and Perry Vale)’, this being Site Allocation 10 in the New Local Plan - an extract of the Site Allocation is attached.</p> <p>We are the freeholders of the now vacant MOT garage building (1a Waldram Place) and are in discussions with the adjacent taxi hire business (22-28 Perry Vale) to bring the entire site forward for development in the near future.</p> <p>There appears to be a slight misunderstanding of the current use class, the Nursery use class is in the 2 bed house that sits just outside of the site allocation</p>	<p>Agree that 1 Waldram Place is not used as a nursery and the text relating to retention or re-provision of the nursery should be removed.</p> <p>Where no advanced pre-application discussions have taken place, the council has used a SHLAA</p>	<p>Land at Forest Hill Station East site allocation amended by including 1 Waldram Place within the site boundary and removing text related to the nursery.</p>

			<p>(1 Waldram Place) and therefore the Nursery re-provision should not be included within the site allocation.</p> <p><i>LB Lewisham officer note: a title plan of the 2 bed corner house and a street view image showing this house circled in red are included in the original representation.</i></p> <p>Lastly, we would like to discuss if there is any opportunity to increase the residential units to above the current figure of 41.</p>	<p>based method to determine indicative site capacities – more details can be found in the Ste Allocations Background Paper</p> <p>Following the Regulation 18 consultation, the site capacities and mix of uses have been re-visited. This has taken into account the complexities of the site – including the need for an appropriate a mix of employment and town centre uses at this district centre site, whilst introducing residential uses and creating a sense of arrival into the district centre. Based on these considerations, the land use mix and residential units have remained the same.</p> <p>Optimal capacity for the site will be established at planning application stage through a design led approach.</p>	
	3	LWA SA 12	<p>I am writing to formally object against the planning proposals for the site of 'Land at Sydenham Road and Loxley Close' in the Lewisham West area.</p> <p>Whilst I completely understand the need for housing and the local plan, I really do not believe that this site/my part of the site can help address this problem in this particular area.</p> <p>There are only two shops and three flats that front Sydenham Road in this plan and I own one of the shops and the flat above it. As the owner of these two units I would not be interested in developing or selling to a developer (I will explain in more detail later). I believe that my site is already developed to capacity (using building lines from existing neighbours) after we converted the upper part of the shop into a separate residential dwelling In 2010 (your ref: fp/09/08690).</p> <p>Our neighbouring shop (Lidl), is the last large/largest commercial unit in Sydenham Road until you reach the Bell Green estate. It is also developed to capacity with two residential flats above the shop. This is the largest retail unit and supermarket in Sydenham serving the community in this area.</p>	<p>Comments regarding the landowner not wanting to develop or sell the furniture shop are noted.</p>	<p>Land at Sydenham Road and Loxley Close site allocation boundary has been amended to exclude the furniture shop.</p>
	3	LWA SA 12		<p>Redevelopment and site intensification, along with the introduction of a wider range of uses, will provide a more optimal</p>	<p>No change.</p>

			<p>The car park at the rear of the buildings (but currently not a through road, joined or belonging in any way to myself or Lidl) is the only car park in this area that serves the community before you go to the Bell Green estate. Until recently, the car park has always been free and served the local shops and residents by making sure that provision is made for people to visit this shopping area. The car park was well used and never to full capacity ensuring that parking was always available when needed. Recent parking (and quite frankly, stupid) policies in this car park have meant that it is being barely used causing parking problems for local residents and making it harder for local businesses with potential customers simply driving through because of the complexity of parking. This car park situation needs re-addressing than rather development.</p> <p>The area itself is very densely populated with existing high level estates on Mayow Road, Sydenham Road and Bell Green causing a strain on all the necessary infrastructure required to cope with the current levels of residents. To add significant numbers to this population after the lack of investment in recent years in the local infrastructure would be further strained.</p> <p>In the web meeting it was suggested than planning should complement with the Bell Green estate rather than compete with it. If that is also the case in reverse, then this end of Sydenham Road would need parking and a supermarket to help the diversity of this part of Sydenham for those wishing to walk to a local supermarket rather than always use, possibly, polluting transport to access the Bell Green estate.</p>	<p>use of land to support the vitality and viability of the town centre.</p> <p>Redevelopment of the site can also make a more optimal use of land by considering options for the car park, including rationalising the existing level of provision, taking into account needs of visitors and businesses along with public transport accessibility levels.</p>	
	- 3	General LWA SA 12	<p>I would also like to thank [name removed] for his time, emails and phone call addressing my complaints and concerns on this matter.</p> <p>I hope that this letter/ email / objection helps with any future decisions about this site in your local plan decisions.</p> <p>Thanks you for all your help and time in this matter.</p>	<p>Comments noted. Our response is set out above.</p>	<p>No change.</p>
	- 3	General LWA SA 12	<p><i>Just some history of this shop, my business, my reasons for being concerned...</i></p> <p><i>This shop is a family business and we sell and buy second hand furniture and antiques and we have been here since 2004. My father passed this business on to me and his grandfather before him.</i></p> <p><i>When we looked to relocate to this area in 2004 it was because we wanted to be closer to my father who has bad health and disabilities. Basically, the locality of this shop to my father (and his accessibility via his mobility scooter) has meant that he has always had a purpose in life and opportunity to come and participate in our day and we have always been local to our parents for any help that they may need. The shop has been a blessing and is the family hub of all activities and communication. It cannot be underestimated how important it is for all the mental wellbeing of a disabled person to be able to get out and go somewhere (something we can all appreciate after this year and the Covid situation).</i></p> <p><i>We started to relocate in 2001 and it took us three years, a lot of money and a lot of effort to find a shop that catered for all our needs. With no exaggeration, this was a really tedious and difficult search and we paid much more than market value to secure these premises.</i></p>	<p>The supplementary information is noted. Our response is set out above.</p>	<p>No change.</p>

			<p><i>In 2010 we converted the upper (storage) part of the shop into a flat so that we could also house a vulnerable sister. Search the council tax register and you will see her name residing there since 2010.</i></p> <p><i>The future plan is that my son, who is a chiropractor, will inherit the shop and use it as a practice, be near the family and in a position to help his disabled brother (my other son). All of this can be achieved with the locality of the shop to the family.</i></p> <p><i>I hope this helps to address my concerns and genuine fear of any plans that may harm this shops future and all of my family that depend on it in in ways far more important than income or finances.</i></p>		
The Cherwell Group (DP9 obo)	3 3	Part Three	<p><i>Relates to Part 3, LNA SA 14</i></p> <p>We note that the Site Allocations Background Paper (2021) states that, “<i>The indicative capacities should not be read prescriptively. The actual development capacity of a site will ultimately need to be determined through the detailed design and planning approval process.</i>”</p> <p>We therefore request that wording is introduced into the beginning of the Site Allocations chapter to identify how these indicative capacities should be interpreted and noting that they are included for reference purposes only.</p>	Agree.	Part 3 of the Local Plan amended by referencing that site capacities are indicative only and should not be read.
QUOD (Landsec obo - Lewisham Shopping Centre)	4 -	DM 01 Infrastru cture Delivery Plan	<p>14 Part Four – Delivery and Monitoring</p> <p>14.1 Landsec supports Policy DM1 ‘Working with stakeholders to deliver the Local Plan’ which sets out the Council ‘proactive and positive approach’ for working withing with landowners, community groups and the local community, and other key stakeholders. Landsec will work collaboratively with the Council.</p> <p>14.2 Landsec supports the need for appropriate infrastructure to support development in the Borough and create the types of places that people want to live in, work in and visit. The Draft Infrastructure Delivery Plan, part of the Council’s evidence base sets out the potential infrastructure requirements for the Borough by type of infrastructure. For certain types of infrastructure, it identifies specific locations (eg. a specific Town Centre) but it doesn’t take a spatial overview of requirements, for example in growth locations.</p> <p>14.3 As the Council has already demonstrated in its regeneration work in the Town Centre to date taking an overview of infrastructure and investing in high quality facilities, infrastructure and public realm is crucial to achieving transformative change. Landsec would wish to engage with the Council to take such an approach to its emerging proposals and also to look at how CIL and Section 106 obligations can be re-invested in the Town Centre and leverage in other funding.</p>	The IDP sets out the Infrastructure requirements thematically and this will then inform discussions through the development management process.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	4	DM 02	<p>14.4 Landsec notes the contents of Policy DM2, which effectively re-states the current policy and legal position on Planning Obligations and Section 106. Landsec also notes that the changes made to Planning Practice Guidance in 2019 suggest that in setting policy requirements for such obligations plan makers should undertake “a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost</p>	The IDP sets out the Infrastructure requirements thematically and this will then inform discussions through the	No change.

			<p>implications of the Community Infrastructure Levy (CIL) and section 106.” And that policies should give a level of certainty about what obligations will be required and that they are affordable.</p> <p>14.5 As presently drafted Policy DM2 gives an open-ended list of items for which obligations might be sought. As noted above in Section 8 the Local Plan Viability Assessment (2019) produced as part of the evidence base does not include for abnormal costs for Lewisham Shopping Centre sites and that viability is challenging.</p> <p>14.6 In this context Policy DM2 should confirm that usually the value of obligations will not exceed whatever forms the basis of the assumptions in the Viability Study (S106: £20/sqm for non residential development and £1,500 per residential unit, S278: £15/sqm for commercial and £1,000 per residential unit). This also re-enforces the need for the site-specific amendment to policy set out at Paragraph 8.22 above.</p>	development management process.	
Freeths LLP (K/S Lewisham obo)	3 4	LCA SA 02 DM 03	<p>Short-Medium Term Flexibility</p> <p>As the emphasis of the allocation is on comprehensive mixed-use development, this indicates an unwillingness to engage or support any schemes that come forward in the allocation area on individual sites. This was reflected in a pre-application meeting held with Officers on the site in June 2019.</p> <p>We note the requirements and explanation given in draft Policy DM3 and how development proposals must be accompanied by a site masterplan where they form all or part of a site allocation. This includes how to address neighbouring properties and the surrounding areas.</p> <p>This is a potentially greater degree of flexibility than was explained in the June 2019 pre-application. There is however a risk that until such time as the majority landowner/promoter in a particular allocation has identified and made clear their objectives and own masterplan content that any other development plots and opportunities will simply not progress or be allowed to progress in the interests of not prejudice future development potential and the preference for a comprehensive approach. This is the risk in the Lewisham Town Centre site allocation where development decisions are largely reliant on one majority landowner party. The applicant held discussions with Land Securities in 2020 as encouraged by the Council but there is no detail as yet from them on the content and timescales of any future scheme after an options consultation undertaken in Autumn 2020.</p> <p>To provide greater flexibility and responsiveness, Policy DM3 and any development allocation which requires a comprehensive approach should also explain how smaller short medium term proposals can be supported. We note this is covered to an extent in DM3 paragraph C, but there should also be greater support for smaller sites/plots in coming forward where there is no indication or commitment on the part of surrounding landowners to progress development. This will then avoid a scenario where no development / investment can proceed which will undermine the growth and place making objectives of the Plan. We would welcome the opportunity to discuss with the Council in the context of Site 2 particularly.</p>	The Local Plan already includes a policy on Meanwhile Uses which states Proposals for the meanwhile (temporary) use will only be supported where the site or unit falls within the boundary of a site allocation that is not expected to come forward for comprehensive redevelopment in the short term and where it does not preclude the permanent use of the site for appropriate commercial or main town centre uses, or prohibit delivery of the site allocation.	No change.

QUOD (Landsec obo - Lewisham Shopping Centre)	4	DM 03	<p>14.7 For the reasons set out above Landsec strongly supports the need for a comprehensive approach to the development of strategic sites and commitment to such an approach to Lewisham Centre. Landsec notes that the NPPF (para 44) suggests that information requirements for applications should be kept to the minimum required to make decisions and that: <i>"Local planning authorities should only request supporting information that is relevant, necessary and material to the application in question"</i>.</p> <p>14.8 It may therefore be useful, to avoid the risk of duplication and for clarity if Draft Policy DM3 referred to the fact that the site masterplan and delivery strategy may be incorporated into other submission documents such as the Design and Access Statement and Development Specification, rather than a stand-alone document.</p> <p>14.9 In relation to DM3c Landsec again supports the need for development to have regard to surrounding properties and the wider area. However, any requirement to Masterplan sites that are not part of an application must be limited and proportionate, and it may be that in many cases the necessary information would not take the form of a 'Masterplan' but of illustrative materials showing how a development site might relate to neighbouring areas.</p> <p>14.10We would therefore suggest the following revision to Policy DM3 c): <i>Proposals must address how the development site relates to neighbouring properties and the surrounding area, particularly in contributing to the delivery of the spatial strategy for the Borough. Where appropriate, and necessary applications will be required to be supported by a masterplan or other illustrative design materials covering multiple other sites in order to demonstrate the acceptability of the scheme both in term of its immediate and wider context. This is may be additional to the site masterplan required by (A) and (B) above.</i></p>	We feel the wording is robust.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	4	DM 05	<p>14.11 As set out in Section 12 of these Representations, Landsec supports the Council's approach to monitoring and review, particularly with regards to community and social infrastructure in the context of changing demographics. Landsec therefore supports Policy DM5 'Monitoring and review'.</p>	Support noted.	No change.
QUOD (Landsec obo - Lewisham Shopping Centre)	5	Appendi x 2	<p>Glossary</p> <p>11.24The Reg 18 Plan should refer to the need to apply the London Plan definition of Metropolitan status flexibly to reflect the changing nature of town centres. The role and function of town centres might not necessarily relate to traditional numeric definitions of floorspace quantum, but rather one based on vitality and viability. The outcomes that are secured through investment in a town centre such as jobs, homes, businesses, health and wellbeing, safety, permeability, building beautiful, carbon reduction, accessibility, culture, happiness and urban greening might become the new ingredients for success and ambition. More floorspace is not necessarily better as the Mayor of London reports in his High Streets and Town Centres Adaptive Strategies.</p> <p>11.25Landsec request that the definition of Metropolitan Town Centre on (page 827) be amended as follows: <i>The London Plan defines these as serving serve wide catchments which can extend over several boroughs and into parts of the Wider South East. Typically,</i></p>	Disagree with the proposed wording. The approach taken in the Local Plan is in conformity with the London Plan, that identifies Lewisham as a having the potential to become a Metropolitan Centre in the future.	Local Plan Glossary amended to reference London Plan definition

			<p><i>they contain at least 100,000 sqm of retail, leisure and service floorspace with a significant proportion of high order comparison goods relative to convenience goods. These centres generally have very good accessibility and significant employment, service and leisure functions. Many have important clusters of civic, public and historic buildings. Due to the structural shift in London's Town Centres, Lewisham Council consider that flexibility should be applied to the floorspace metric in the London Plan. In seeking to achieve Metropolitan Town Centre status, Lewisham Council will apply weight to structural improvements in town centre vitality and viability and outcomes secured through investment in the town centre for jobs, homes, businesses, health and wellbeing, safety, permeability, exemplar design, carbon reduction, sustainability culture, and the green and blue environment. Lewisham Council considers that these factors are new ingredients for success and ambition of a Metropolitan Town Centre.</i></p>		
Phoenix Community Housing Association (Maddox Planning obo)	- -	General Policies map	<p>LEWISHAM LOCAL PLAN REGULATION 18 REPRESENTATIONS</p> <p>LAND TO THE REAR OF ARCUS ROAD/CHINGLEY CLOSE</p> <p>Please find enclosed a representation to the Regulation 18 Lewisham Local Plan, submitted on behalf of our client, Phoenix Community Housing Association. This representation relates to the proposed extension to the site designation of Bromley Hill Cemetery as a Site of Local Importance (SINC) and to the historic Public Open Space designation adjacent.</p> <p>Our client requests that two changes are made to the Local Plan draft proposals map. The first that the boundary of Public Open Space at the north east of the designation be corrected to follow the correct boundary of the genuine Public Open Space within the confines of the cemetery. The second is that the proposed extension to the SINC designation is not taken forward into the next stage of the Local Plan.</p>	Following Regulation 18 Consultation an Open Space Review has been prepared which has reviewed the boundaries of designated open space to ensure they accurately capture the extent of the open space.	Local Plan amended to show Bromley Hill Cemetery as designated Strategic Open Space, with its boundary amended to exclude private gardens and communal amenity space of the Swiftsden Way properties.
Phoenix Community Housing Association (Maddox Planning obo)	- -	General Policies map	<p>BACKGROUND</p> <p>Our client, Phoenix Community Housing Association, is currently undergoing pre-application discussions with Officers at Lewisham Council regarding the redevelopment of land to rear of Arcus Road/ Chingley Close to provide new homes with integrated landscaping (PRE/21/120195). The latest pre-application response was issued to our client on 24 February 2021. In 2015, a land swap was carried out between Lewisham Council and Phoenix Housing, resulting in Phoenix Housing acquiring the land shown outlined in blue below. Historic maps indicate some of this land at the north west of the plot might have formerly been used as private allotments in the 1970s but this is not confirmed, and certainly not the case now. The land has been left to become overgrown and has not been in use as allotments for at least 23 years.</p> <p>1 https://councilmeetings.lewisham.gov.uk/ieDecisionDetails.aspx?Id=2270</p> <p><i>LB Lewisham officer note: Image 1: Phoenix Community Housing Association site ownership plan is included in the original representation. The map shows the extent of the site's ownership</i></p>	The supplementary information is noted.	No change.
Phoenix Community Housing Association	- -	General Policies map	I trust the above is clear and the suggested amendments to the designations will be fully considered, however please don't hesitate to get in touch should you wish to discuss any of the above.	Comments noted.	No change.

(Maddox Planning obo)					
Tribe Student Housing (Avison Young obo)	-	Policies map	<p><i>Relates to Part 3, LNA SA 06</i></p> <p>Proposed Changes to the Adopted Policies Map</p> <p>As set out in paragraph 5.5, alterations are proposed to Surrey Canal Road SIL in order to enable to co-location of employment and other uses in line with draft London Plan policies E5 and E7. This provides for the de-designation of Apollo Business Centre, Trundleys Road and Evelyn Court sites from SIL (these are now proposed site allocations for comprehensive employment-led mixed-use redevelopment). The Bermondsey Dive Under site is proposed to be captured as a new addition to this SIL designation and is effectively replacement SIL provision for the aforementioned co-location sites. This approach is shown in the following diagrams:</p> <p><i>LB Lewisham officer note: Figure 2: Diagrams from LBL Proposed Changes to Adopted Policies Map are included in the original representation. They show existing and proposed boundary changes to Surrey Canal SIL.</i></p> <p>Notwithstanding the above comments, we are supportive of the de-designation of the Trundley’s Road site from SIL and allocation of the site for commercial-led mixed-use development. We are also supportive of the approach to include the Bermondsey Dive Under site within the SIL designation.</p>	Support noted.	No change.
Trundley’s Road Ltd (Avison Young obo)	-	Policies map	<p><i>Relates to Part 3, LNA SA 06</i></p> <p>Proposed Changes to the Adopted Policies Map</p> <p>As set out in paragraph 5.5, alterations are proposed to Surrey Canal Road SIL in order to enable to co-location of employment and other uses in line with draft London Plan policies E5 and E7. This provides for the de-designation of Apollo Business Centre, Trundleys Road and Evelyn Court sites from SIL (these are now proposed site allocations for comprehensive employment-led mixed-use redevelopment). The Bermondsey Dive Under site is proposed to be captured as a new addition to this SIL designation and is effectively replacement SIL provision for the aforementioned co-location sites. This approach is shown in the following diagrams:</p> <p><i>LB Lewisham officer note: Figure 2: Diagrams from LBL Proposed Changes to Adopted Policies Map are included in the original representation. They show existing and proposed boundary changes to Surrey Canal SIL.</i></p> <p>Notwithstanding the above comments, we are supportive of the de-designation of the Trundley’s Road site from SIL and allocation of the site for commercial-led mixed-use development. We are also supportive of the approach to include the Bermondsey Dive Under site within the SIL designation.</p>	Support noted.	No change.
	3 2	LNA SA06 EC 02	<p><i>Relates to Part 3, LNA SA 06</i></p> <p>As set out in paragraph 5.5, alterations are proposed to Surrey Canal Road SIL to enable the co-location of employment and other uses in line with draft London Plan policies E5 and E7. This provides for the de-designation of Apollo Business Centre Trundley’s Road and Evelyn Court sites from SIL (these are now proposed</p>	Support noted.	No comment.

			<p>site allocations for comprehensive employment-led mixed-use redevelopment). The Bermondsey Dive Under site is proposed to be captured as a new addition to this SIL designation and is effectively replacement SIL provision for the aforementioned co-location sites. This approach is shown in the following diagrams:</p> <p>Figure 2 Diagrams from LBL Proposed Changes to Adopted Policies Map.</p> <p>Notwithstanding the above comments I am supportive of the de-designation of the Trundley’s Road site from SIL and allocation for commercial-led mixed use development. I am also supportive of the approach to include the Bermondsey Dive Under within the SIL designation.</p>		
Phoenix Community Housing Association (Maddox Planning obo)	- 2 2 5	Policies map GR 02 Figures 10.1 and 10.2 Schedule 07 Table 21.2	<p>PUBLIC OPEN SPACE: ADOPTED POLICY CONTEXT AND EVIDENCE BASE</p> <p>The below map is an extract from the adopted Proposals Map. It shows the area in light green designated as Public Open Space’ and the dotted area overlaying it as a ‘Site of Importance for Nature Conservation’.</p> <p><i>LB Lewisham officer note: Image 2: Lewisham’s adopted proposals Map is included in the original representation. The map shows the extent of the Public Open Space and the Site of Importance for Nature Conservation’.</i></p> <p>The pre-application submission includes some built development on the Public Open Space at the north east area of the designation, which is land within Phoenix’s ownership. This overlap has been noted by the Council in recent discussions and the pre-application response as mentioned above states that <i>‘Development on the area identified as public open space will only be supported where this area is de-designated. It was discussed at the meeting that the land may have been designated in error. Both the Applicant and Officers agreed to explore this further. De-designation should occur through the Draft Lewisham Local Plan. The Applicant should submit detailed representations to the Regulation 18 consultation, which includes the partial allocation of the application site.’</i> It is not understood as to why the area of Public Open Space at the north east outside the cemetery land was designated in the first instance given that the area is not accessible to members of the public and makes up the private rear gardens of the residential block adjacent along Swiftsden Way. As Officers have alluded, it was likely designated in error.</p> <p>The Lewisham Leisure and Open Space Study 2013 confirms the Public Open Space designation was indeed made in error as the area of land to the north east outside the cemetery boundary was originally thought to be part of the cemetery. The classification map from the 2013 Study, shown below in Image 3, clearly shows that the boundary of the cemetery was originally drawn incorrectly by including the rear private gardens and communal amenity space of the Swiftsden Way properties. Comparing this with Google Maps in Image 4 it is clear where the true boundary of the cemetery lies.</p> <p><i>LB Lewisham officer note: Image 3: Lewisham Leisure and Open Space Study 2013 (Site 39) and Image 4: Google Maps extracts are included in the original representation. They show the discrepancy where the boundary lies.</i></p>	Following Regulation 18 Consultation an Open Space Review has been prepared which has reviewed the boundaries of designated open space to ensure they accurately capture the extent of the open space.	Local plan amended to show Bromley Hill Cemetery as designated Strategic Open Space, with its boundary amended to exclude private gardens and communal amenity space of the Swiftsden Way properties.

			<p>PROPOSED CHANGE TO THE ADOPTED PUBLIC OPEN SPACE DESIGNATION</p> <p>The above evidence demonstrates that the area to the north east of the cemetery was originally thought to be part of the cemetery and designated accordingly as Public Open Space. It is requested this error be corrected to reflect the true cemetery boundary. The area that was incorrectly designated is for the residents of the block along Swiftsden Way to enjoy privately and is currently not publicly accessible. There is no circumstance in which this land could or should become public or connected to the cemetery, therefore it should not be designated as such.</p>		
Phoenix Community Housing Association (Maddox Planning obo)	- 2 5	Policies Map Section 08 Page 52 GR 03 Figure 10.7 Schedule 08 Table 21.3	<p>SITE OF LOCAL IMPORTANCE: EMERGING POLICY CONTEXT</p> <p>As part of the Regulation 18 Lewisham Local Plan it has been proposed to extend the boundary of the Bromley Hill Cemetery SINC designation northwards as shown in green on the below Image 5. If progressed to the next stage of the Local Plan preparation, this would therefore result in most of the phase 1 development site being stringently protected and unlikely to be suitable for built development. In effect, this proposed designation could prevent the delivery of much needed affordable housing.</p> <p><i>LB Lewisham officer note: Image 5: Regulation 18 proposed extension of the Bromley Hill Cemetery SINC is included in the original representation. The map shows the proposed addition.</i></p> <p>The presumed reason for the proposed extension is that the Re-survey of Sites of Importance for Nature Conservation (SINCs) in Lewisham Report 2016, which is part of evidence base for this new Local Plan, identified Bromley Hill Cemetery as a site with a decline in acid grassland with a SINC Enhancement Opportunity that would ‘<i>benefit from a management plan to identify areas most suited for management for wildlife, in particular areas of acid or dry grassland</i>’. The land to the north was identified as ‘scrub’.</p> <p>The Lewisham Open Spaces Assessment 2020 has classified this land to the north as ‘natural and semi-natural urban green space’, which is a new classification since the 2013 Open Space Study where it wasn’t acknowledged at all, despite the site conditions not changing.</p> <p>PROPOSED CHANGE TO THE EMERGING SINC DESIGNATION</p> <p>It is considered this proposed extension to the SINC was made in error without all the correct site details available to the Council. The land is completely inaccessible either through the rear gardens of the houses, through the cemetery, or via the garages to the west, and so would not be able to be managed or maintained if designated. The land is also privately owned by our client, so the Council would have no ability to control the management or maintenance even if they could access the site.</p> <p>Our client is not disputing the need for a management plan for the cemetery given this land has been found to be in decline. They are however disputing the idea that in order to rectify this decline the SINC needs to be extended up into</p>	Agree that due to access and ownership constraints the SINC should not be extended	Local Plan to retain the current boundary of the SINC without extending it.

			<p>private land. The 2016 Re-survey lacks clear justification for extending into this particular area with regards to specifying the features of the land that make it appropriate for a SINC, having not been able to access the land or consult the land owner. It indicates a thorough assessment of the land was not carried out and the decision was made without a full understanding the site. NPPF paragraph 35 requires Local Plans to be prepared in accordance with legal and procedural requirements. A Plan is ‘sound’ if it is justified, whereby it is appropriate and takes into account the reasonable alternatives based on proportional evidence, and effective, whereby it is deliverable over the plan period and based on effective joint working on cross-strategic matters. In this case the proposal to extend the SINC is not considered to be justified or effective and so not considered a ‘sound’ amendment to the Local Plan.</p> <p>Furthermore, Lewisham’s Open Spaces Assessment 2020 has assessed the proposed new area of SINC land as being of ‘poor quality’, scoring just 13%, with ‘no access’, see below Image 6. This area of scrubland cannot make any valuable or meaningful contribution to the established SINC given it is constrained on all sides, is privately owned, and has few redeeming environmental qualities. It is considered this poor quality small parcel of land would be much better used to deliver affordable housing for the Borough, a strategy which is fully supported by the Council. Notwithstanding this, the proposed redevelopment of the site does offer the opportunity for biodiversity enhancements to take place and an ongoing management plan to be secured alongside sensitively designed new housing. This will enable the council to meet its broad objective to enhance opportunities for nature in this locality.</p> <p><i>LB Lewisham officer note: Image 6: Lewisham’s Open Space Assessment 2020 is included in the original representation. The map shows the site categorised as fair and poor.</i></p> <p>Retaining the boundary of the SINC as it currently is would have minimal harmful impacts on local nature conservation given that the condition of the proposed new area is poor quality scrubland that has been in the same poor condition for approximately 40 years with no viable means of improving or managing it. Retaining the boundary of the SINC would also enable the required management plan to be drawn up whilst delivering significant public benefits by allowing our client to bring forward much needed affordable housing for the Borough.</p>		
Big Yellow Storage Company Limited (DWD obo)	-	Policies map	<p>Proposed Changes to the Adopted Policies Map</p> <p>Paragraph 5.8 of the ‘<i>Proposed Changes to the Adopted Policies Map</i>’ states that the new Local Plan proposes to change the terminology of LEL, as used in the adopted Local Plan, to ‘Locally Significant Industrial Site’ (LSIS), for consistency with the terminology used in the London Plan.</p> <p>Paragraphs 5.9-5.11 confirm the designation of an additional LSIS, alterations to the boundary of some of the existing LELs, and the LEL boundaries which will remain in their existing state (as the newly named LSIS).</p> <p>The existing Lewisham Way LEL is not referenced as an LSIS in the draft consultation document, nor is it referred to in the proposed changes to the policies map as being de-designated. Conversely, Figure 8.1 shows a map of the employment land hierarchy and illustrates the Site as forming part of an LSIS.</p>	Agree that there are inconsistencies in the designation of this site as an LSIS throughout the Local Plan and policies map.	Local Plan and Proposed Changes to Adopted Policies Map amended to list Lewisham Way as a designated LSIS.

			We request that clarity is provided as to whether the intention is for the Lewisham Way LEL to be retained in the LSIS or not in the new Local Plan.		
Blackheath Car Park (M&A) Ltd (Acorn obo)	- -	General Call for site	<p>You might recall you kindly sent me an application form in response for your call for sites which needs to be submitted before 11th April.</p> <p>I would like to propose to sites in a similar location as follows :</p> <p>1) Blackheath Station Car Park Hurren Close London SE3 9LE</p> <p>2) Airspace Above Network Rail Tracks & Blackheath Station Car Park Hurren Close London SE3 9LE</p> <p>It would be really helpful to know what is the broad programme and timescales for these sites to be considered. I would imagine they would be considered internally by the Council first at a cabinet meeting.</p> <p>Hopefully this is all the information you need for now but please do not hesitate to contact me should you require any clarification or additional information. Please let me know that you have received this email.</p> <p>Please could you keep me updated on the Local Plan.</p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Blackheath Car Park (M&A) Ltd (Acorn obo)	-	Call for Site	<p><i>LB Lewisham officer note: a Call for sites submission form and map showing the site boundary are included in the original representation.</i></p> <p>Site name and address: Blackheath Station Car Park Hurren Close London SE3 9LE</p> <p>Proposed use(s): Retention of Car Park & Market - Numerous Options within Class E including Retail Offices Medical Services etc. Class C & Class F.</p>	The call for site submission for Blackheath Station Car Park is noted. We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.	No change.
Blackheath Car Park (M&A) Ltd (Acorn obo)	-	Call for site	<p><i>LB Lewisham officer note: a Call for sites submission form and map showing the site boundary are included in the original representation.</i></p> <p>Site name and address: Airspace above Network Rail Tracks and Blackheath Station Car Park Hurren Close London SE3 9LE</p> <p>Proposed use(s): Significant Opportunities to create a new Village Hub to potentially include significant Public Realm ,Improved Porosity across Rail Tracks ,Affordable Housing, Art House Cinema/Meeting Hall , Share Ownership Commercial Space, Small Food Store ,Permanent Covered Market ,Creche /Nursery, Car Charging Hub, significant Enhanced Green Corridor , plus - Numerous Options within Class E including Retail Offices Medical Services etc. Class C & Class F.</p>	The call for site submission for Airspace above Network Rail Tracks and Blackheath Station Car Park is noted. We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.	No change.
W&R Buxton Holdings Ltd (BPTW obo)	-	General Call for site	<p>Site Context / Background</p> <p>The Site is 0.097ha in area. It is located entirely within the administrative boundary of the London Borough of Lewisham (LB Lewisham). The Site’s current Use Class is Sui Generis. Scott House comprises 19no. live / work units, consented in 2001. The existing building is a 3-storey late Victorian building which currently provides 408sqm of B1 ‘work’ space according to approved plans. The Applicant, W&R Buxton Holdings Ltd., is the landowner and landlord of the existing building on the Site.</p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

			<p><i>LB Lewisham officer note: Figure 1: Site location is included in the original representation. The aerial photograph shows the boundary of the site adjacent to the north eastern corner of the Timber Yard site (LNA SA 02).</i></p> <p>Core Strategy 2011 – Strategic Site Allocation 4 Oxtalls Road</p> <p>The Site is located within the Lewisham, Catford and New Cross Opportunity Area (London Plan 2016) and is approximately 500m from Deptford District Town Centre. The Site is currently allocated for mixed-use redevelopment within Lewisham’s Core Strategy (2011), within Strategic Site Allocation 4 – Oxtalls Road (SSA4) Mixed Employment Location (MEL). The subject Site occupies the north eastern corner of the wider Strategic Site Allocation, which is approx. 4.6 ha in area and spans the entire urban block bounded by Oxtalls Road, Grove Street, Evelyn Street and Dragoon Road.</p> <p><i>LB Lewisham officer note: Figure 2 Strategic Site Allocation 4 is included in the original representation. The map shows an extract from the Core Strategy 2011 showing the site’s boundary.</i></p> <p>The remainder of SSA4 is occupied by the Lendlease Timberyard Masterplan scheme with Hybrid planning permission (DC/15/092295) and Reserved Matters Planning Approval for certain phases with part of the site already under construction. Scott House did not form part of the Timberyard planning application.</p> <p>Draft Local Plan 2021</p> <p>The Timberyard Masterplan is now included in the Draft Local Plan 2021 as Timber Yard, Deptford Wharves at Oxtalls Road mixed Use Employment location. The allocation is for mixed use redevelopment with an indicative development capacity of 1,600 residential units and 5413 sqm of employment floorspace and 5,000 sqm of main town centre floorspace. The allocation does not include Scott House.</p>		
W&R Buxton Holdings Ltd (BPTW obo)	-	General Call for site	<p>Planning Application ref: DC/19/113332</p> <p>A planning application for the redevelopment of Scott House was submitted to LB Lewisham in July 2019. The application sought full planning permission for the following description of development: Redevelopment of Scott House including partial façade retention and construction of a new mixed-use building to provide 137 no. residential dwellings, together with the provision of B1 employment space and A3 café space, with associated landscaping, play space, refuse storage, cycle parking and additional public realm.</p> <p>Following extensive consultation with LB Lewisham officers and the local community the planning application proposed the following:</p> <ul style="list-style-type: none"> • Part-retention of Scott House façade; • 137no. residential flats (1-, 2-, and 3-bedroom at social rent, London Living Rent and market tenures); • 100% dual-aspect dwellings; 	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

			<ul style="list-style-type: none"> 824sqm of employment floorspace at mezzanine and first floor (Use Class B1) providing 64-103 full time jobs under B1(a) use, 14-21 full time jobs under B1(b) use, and c.18 no. full time jobs under B1(c) use. 120sqm of café space at ground floor (Use Class A3) providing employment for 6-8 FTEs; 14no. wheelchair accessible / adaptable dwellings; Cycle parking provision in line with draft London Plan (2017) requirement; Improved communal and public amenity spaces; Completion of the ‘final piece’ of the Timberyard Masterplan / SSA4 Allocation through a well-integrated scheme which responds to the emerging context; Opportunity for public realm improvements; Play space and amenity provision at ground floor level. <p><i>LB Lewisham officer note: Appendix 1 Committee Report (LPA ref: DC/19/113332) is included in the original representation.</i></p> <p>Planning officers recommended the application for approval. The application was presented to LB Lewisham strategic planning committee 30th January 2020 where members resolved to grant planning permission subject to completion of a satisfactory 106 agreement and no direction being received from the Mayor of London. The Mayor has confirmed in writing that he is content to allow the local planning authority to determine the case itself and the s106 agreement is in the process of being completed and signed.</p>		
W&R Buxton Holdings Ltd (BPTW obo)	-	Call for site	<p>Scott House, 185 Grove Street, SE8</p> <p>In response to The Lewisham Local Plan Consultation, we wish to promote Scott House, 185 Grove Street, SE8 on behalf of W&R Buxton Holdings Ltd to be included in the Local Plan as a mixed-use location to include B1 employment space and residential use.</p> <p>Summary and Conclusions Scott House has a resolution to grant planning permission and will shortly be granted full planning permission by LB Lewisham to provide 137 residential units, 824sqm of employment floorspace and 120 sqm café space. For this reason, we consider that the site should be included in the LB Lewisham Local Plan as an allocated site for mixed use redevelopment to include residential use and employment use in accordance with the development capacity agreed within planning application DC/19/113332.</p>	The call for site submission for Scott House is noted. Agree that there is merit in including the consented Scott House site within the Deptford Landings site allocation.	Deptford Landings site allocation amended to include Scott House.
The Arch Company Properties LP (Turley obo)	-	Call for Site	<p><i>LB Lewisham officer note: a Call for sites submission form and site plan showing the site boundary are included in the original representation.</i></p> <p>Site name and address: Land at Station Approach, Burnt Ash Hill, Lee, London, SE12 0AB.</p> <p>Proposed use(s): Residential-led redevelopment of site (exceeding the minimum threshold of 10 residential units).</p>	The call for site submission for land at Station Approach, Burnt Ash Hill is noted. We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.	No change.

(Peter Pendleton & Associates Ltd obo)	-	Call for site	<p>I refer to the call for sites - We were supposed to submit this for consideration.</p> <p>Although this call has closed, i was wondering if this site could be added for consideration in the future.</p> <p>Please add our details on consultee lists on behalf of the land owner.</p> <p><i>LB Lewisham officer note: a site plan of Courtrai Road is included in the original representation. It shows a tree survey on the Courtrai Road site.</i></p>	The call for sites submission for the Old Scout Hut and surrounding land at Courtrai Road is noted. We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.	No change.
AA Homes and Housing (Wsp obo)	-	Call for site	<p>On behalf of the landowner, AA Homes and Housing, we wish to put forward the enclosed site at Courtrai Rod, Lewisham as a proposed housing site in response to Lewisham Council's 'Call for Sites' consultation as part of the wider Local Plan process.</p> <p>The site provides a good location for new housing which can be developed over the next 5 years, delivering not only benefits in terms of providing key housing for the community but also management and maintenance of a historically disused site.</p> <p>The site</p> <p>The site is located on Courtrai Road, Lewisham and is approximately 1.1ha in size. It is bound by a railway line to the west serving major train stations in central London, and the rear gardens of properties to the east which align Buckthorne Road. The surrounding area is predominantly low rise and residential in nature. The site is accessed from Courtrai Road to the south. At this end is a declining prefabricated building previously used as a church but has remained vacant for some time. The remaining part of the land is covered by trees and foliage which have been identified as having low to moderate ecological value. The building on site is not listed and the site is not within a conservation area. It has a PTAL rating of 3 and is approximately 400m from Honor Oak Park station indicating its sustainable nature.</p> <p>Development potential</p> <p>The NPPF is clear in section 2 that the purpose of the planning system is to achieve sustainable development and that the planning system has three overriding objectives (economic, social and environmental). The economic objective includes helping to build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right place at the right time to support growth and innovation.</p> <p>The social objective includes supporting communities by fostering a well -designed and safe built environment with accessible services and open spaces that support communities' health, social and cultural well-being. The environmental objective includes making effective use of land, helping to improve biodiversity and moving to a low carbon economy. All of which this site can deliver.</p> <p>The site is situated in a suitable and sustainable location within the built settlement. Given its links with the existing adjacent built area, including access to key local services and facilities, the site lends itself to residential development.</p>	Comments supplementary to the call for sites submission are noted. Our response is set out below.	No change.

			<p>The development of the site would see a underused and unmanaged site deliver both a high quality development and allow for part of the site to become managed green space to link to the aspirations of both the Local Plan and emerging Crofton Park And Honor Oak Neighbourhood Plan in terms of conservation. The delivery of housing on this site would therefore assist in providing much needed housing to meet local needs and in particular will provide an appropriate contribution to the level of housing required in Lewisham. Importantly, redevelopment of the brownfield site could facilitate new public access to the remainder of the site, in conjunction with dedicated improvements to the biodiversity of the rest of the site.</p> <p>We set out below a brief justification to demonstrate how the site meets the required criteria of being suitable, available and achievable.</p> <p>Availability The site is in single ownership with no legal or ownership impediments to development and is available for development now. The site does not lie within an area of flood risk and is therefore, in principle, suitable for development. There are no known physical or legal constraints which would preclude development from coming forward at this stage.</p> <p>Achievability The NPPG advises that a site is considered achievable for development where there is a reasonable and realistic prospect that the particular type of development will be developed on the site at a particular point in time. Taking into account its context and characteristics, we are is satisfied that the site offers a realistic and viable prospect for development in line with the tests of NPPF.</p> <p>Deliverable The site is suitable, available and the proposed development is achievable and therefore the site is considered to be deliverable within 5 years.</p>		
AA Homes and Housing (Wsp obo)	- 2 2	Call for site HO 01 HO 02	<p>Summary The emerging Local Plan sets out a 10-year strategic housing target of 16,670 net housing completions (or 1,667 net completions per year). The site will make a modest but helpful contribution towards this target as well as contribution to policy HO2 Optimising the use of small housing sites which is based around the NPPF (2019) placing a strong emphasis on the role of small sites in supporting housing delivery.</p> <p>Given its sustainable location and connection to the existing residential and urban area, the site lends itself to residential development, providing a logical and sustainable infill development to the existing urban area of Lewisham. The site is single ownership and controlled by AA Homes and Housing, representing an available site in line with the tests of NPPF. There are no significant constraints which could not be overcome, and the site offers a realistic and viable opportunity for development.</p>	Comments supplementary to the call for sites submission are noted. Our response is set out below.	No change.
AA Homes and Housing (Wsp obo)	-	Call for site	In light of the above, we can confirm that the site is suitable, available and achievable for residential development. We would therefore respectfully request that this site is retained as a future development opportunity and considered under the call for sites exercise.	Comments supplementary to the call for sites submission are noted. Our response is set out below.	No change.
AA Homes and Housing (Wsp obo)	-	Call for site	<i>LB Lewisham officer note: a Call for sites submission form and site plan showing the site boundary are included in the original representation.</i>	The call for sites submission for the Old Scout Hut and surrounding	No change

			<p>Site name and address: Old Scout Hut and land surrounding at Courtrai Road</p> <p>Proposed use(s): Residential dwelling houses – use class C3</p>	land at Courtrai Road is noted. We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.	
L&Q Group	- -	General Call for site	<p>LEWISHAM LOCAL PLAN – REGULATIONS 18 STAGE “MAIN ISSUES AND PREFERRED APPROACHES” DOCUMENT (JANUARY 2021) AND CALL FOR SITES</p> <p>Thank you for the opportunity to provide formal representations to the Council’s Lewisham Local Plan Regulation 18 stage “Main Issues and Preferred Approaches” document (January 2021).</p> <p>1. About L&Q L&Q is a regulated charitable housing association and one of the UK’s most successful independent social businesses. The L&Q Group houses around 250,000 people in more than 105,000 homes, primarily across London and the South East. As a not-for-profit organisation, L&Q reinvest all the money we make into new and existing homes, creating successful communities and providing excellent services. L&Q have also created a Strategic Partnership Team who work closely with smaller housing association partners and help them deliver new homes on typically smaller sites.</p> <p>2. L&Q in Lewisham L&Q is a major provider of homes in Lewisham, currently managing over 7,500 homes across the Borough. We see great potential in Lewisham and currently have new homes under construction at the Excalibur Estate and Timberyard.</p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
L&Q Group	- -	General Call for site	<p>6. Future Participation In summary, we are supportive of LB Lewisham updating its Local Plan to guide development between 2020 - 2040. These amendments to the Draft Local Plan will ensure that the document is more closely aligned with wider London Plan and will assist in the delivery of a wide range of material planning and community benefits across the borough.</p> <p>We look forward to confirmation of receipt of these representations and request the right to be heard by the appointed examiner at the Examination in Public if we choose to participate further.</p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
L&Q Group	-	Call for site	<p>5. Lewisham Local Plan - Call for Sites <i>Alongside these representations on the draft Local Plan, we have also enclosed the requisite forms and associated OS maps for L&Q sites at One King’s Hall Mews, SE13 5JQ and Grace Close, SE9 for consideration as part of the Call for Sites exercise by LBL.</i></p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
L&Q Group	-	Call for site	<p><i>LB Lewisham officer note: a Call for sites submission form and map showing the site boundary are included in the original representation.</i></p> <p>Site name and address: One Kings Hall Mews, Lewisham, SE13 5JQ</p> <p>Proposed use(s): Residential dwellings</p>	The call for sites submission for One Kings Hall Mews is noted. We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.	No change

L&Q Group	-	Call for site	<p><i>LB Lewisham officer note: a Call for sites submission form and map showing the site boundary are included in the original representation.</i></p> <p>Site name and address: Vacant land at Grace Close, SE9 (also identified as SA1 Lions Close in Grove Park Neighbourhood Plan).</p> <p>Proposed use(s): Residential dwellings</p>	The call for sites submission for vacant land at Grace Court is noted. We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.	No change.
Yorkshire & Clydesdale Bank Trustees Ltd c/o CBRE Global Investors (Montagu-Evans obo)	- -	General Call for site	<p>LEWISHAM LOCAL PLAN – REGULATION 18 MAIN ISSUES AND PREFERRED APPROACHES CONSULTATION JANUARY 2021</p> <p>HUNTSMAN HOUSE AND 10-16 EVELYN STREET</p> <p>We write on behalf of our client, Yorkshire & Clydesdale Bank Trustees Ltd c/o CBRE Global Investors, to make representations in respect of the London Borough of Lewisham (LBL) Local Plan Regulation 18 Local Plan consultation. Our client owns Huntsman House and 10-16 Evelyn Street, Deptford (the Site). The representations are set out against the headings presented within the Draft Local Plan Regulation 18 consultation version dated January 2021.</p> <p>Background</p> <p>The Site is located on Evelyn Street, Deptford, within the administrative authority of LBL. It occupies an area of approximately 1.2 hectares and is currently occupied by a collection of buildings with areas of hardstanding (refer to Figure 1 below).</p> <p><i>LB Lewisham officer note: Figure 1: Aerial Image of the Site is included in the original representation. It shows the site boundaries in red.</i></p> <p>The Site can be broken down into two parts. Huntsman House comprises an L-shaped detached building that is situated along the western and southern part of the Site. Huntsman House comprises a self-contained warehouse with a two storey brick built ancillary office unit that is set back from Evelyn Street. It is occupied by Constantine. The remainder of the Site comprises a storage and distribution warehouse occupied by Wolseley. Both units have dedicated access points from Evelyn Street.</p> <p>The Site is designated as a Local Employment Location (LEL) by Policy CS3 and Policy DM10 of the Local Plan. The Site does not fall within a Conservation Area and is located in Flood Zone 1 (low risk of flooding). There are no listed buildings in close proximity. The southern corner of the Site is located within a Protected Vista: Wider Setting Consultation Area for the protected view from Blackheath Point to St Paul’s Cathedral.</p> <p>The Site is in a location undergoing significant regeneration, which includes several strategic scale developments in close proximity. Most notably this includes Deptford Wharves circa 280 metres to the south east, as well as Convoys Wharf which is circa 630 metres to the south east. Both schemes are under construction and will provide approximately 5,100 homes, as well as employment and town centre uses including retail. This includes tall buildings of up to 40 storeys.</p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

Yorkshire & Clydesdale Bank Trustees Ltd c/o CBRE Global Investors (Montagu-Evans obo)	- -	General Call for site	<p>Our client is now working proactively on proposals to transform the Site into a mixed use development. This work is at the early stages of scheme development and includes establishing a Planning Performance Agreement with the Council in advance of a planning application coming forward. At this stage, initial feasibility work completed identifies a capacity of approximately 250 homes with retained employment use. Detailed technical and environmental assessments will be undertaken in due course to ensure that sufficient evidence is provided to underpin the allocation of the Site in the emerging Plan. This will be fundamental in ensuring the allocation is sound and based on proportionate evidence as sought by the NPPF.</p> <p>The comments in these representations relate specifically to our client’s Site and are set out against the relevant policies presented in the Plan.</p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Yorkshire & Clydesdale Bank Trustees Ltd c/o CBRE Global Investors (Montagu-Evans obo)	- -	General Call for site	<p>Our client looks forward to continuing to engage positively with the Council in the preparation of the Local Plan. We request that we are kept informed of any updates going forward. We would also like to have the right to participate at any oral examination if necessary.</p> <p>If you have any queries regarding this submission, or would like to discuss the proposals further, please contact us.</p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Yorkshire & Clydesdale Bank Trustees Ltd c/o CBRE Global Investors (Montagu-Evans obo)	-	Call for site	<p>Closing</p> <p>Our client welcomes and supports the Council’s ambitious strategy set out in its Regulation 18 consultation. In light of the substantial development challenges the Council faces, the acknowledgement that intensification of existing industrial sites will be required is supported. However, we would request that the Council reconsiders its approach to co-location on LSIS land. Specifically we would request that our client’s Site is included as an appropriate site for co-location of employment and residential uses.</p> <p>Initial feasibility work indicates that the Site could achieve at least 250 units whilst ensuring no net loss of industrial capacity. Evelyn Street represents a realistic prospect for the delivery of a significant quantum of development that could make a meaningful contribution to the Council’s significant housing targets whilst ensuring continued employment use on the Site. This could be achieved early in the Plan period. The development of a masterplan and further environmental assessment will be provided to the Council as the Local Plan develops, to demonstrate that a mixed-use development could be delivered and to underpin a site allocation in the Plan.</p>	The call for site submission for Evelyn Street is noted. We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.	No change.
Albacore Meeting Room Trust (Lichfields obo)	- -	General Call for site	<p>Lewisham Local Plan Regulation 18 Stage ‘Main Issues and Preferred Approaches’, January 2021 Consultation</p> <p>Introduction</p> <p>On behalf of the Albacore Meeting Room Trust (‘the Trust’), please find enclosed representations to the above consultation, which has been published for comment until the 11th April 2020.</p> <p>Lichfields act as planning consultant for the Trust which owns the Brethren Meeting Hall site (also known as the Albacore Religious Meeting Rooms), off Beckenham Hill Road (see Figure 2.1, Appendix 1).</p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

			<p>The 1.47 ha site is broadly rectangular and extends between Beckenham Hill Road (A2015, south) and Sedgehill Road (north). The site comprises a detached, single storey brick building that is centrally located within the site and surrounded by an expanse of asphalt car parking. It is predominantly ‘brownfield land’, fenced and entirely private. The building has been a place of worship for some 30 years but the building and the site are currently vacant.</p> <p>The site is subject to a live planning application as of November 2020 (DC/20/119014), by applicants Citygate Church, for demolition of the existing single storey religious building at the site and erection of a part two/part three storey building comprising a new church space, together with outdoor amenity space and car parking. It is anticipated that the application will be determined in late Spring 2021.</p>		
Albacore Meeting Room Trust (Lichfields obo)	- -	General Call for site	<p>Concluding Remarks</p> <p>We trust that these representations are clear and that they will assist the Council with preparation of its draft Plan. The Trust would welcome the opportunity to discuss the contents of these representations with Council Officers, with the view to removing the site from the MOL and allocating it for flexible community use development in order to meet demonstrable local needs and align with LBL’s aspirations for regeneration of the South Area of the Borough.</p> <p>Please can you confirm due receipt of these representations and keep us informed of the ongoing progress with the Local Plan Review. Please do not hesitate to contact us.</p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Albacore Meeting Room Trust (Lichfields obo)	-	Call for site	<p><i>LB Lewisham officer note: Annex 1: Brethren Meeting Hall Site, Beckenham Hill – Lichfields Metropolitan Open Land Review is included in the original representation. It provides an assessment of the contribution the site makes to MOL and the scope for the full release of the land, supported by Appendices 1-5.</i></p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Albacore Meeting Room Trust (Lichfields obo)	-	Call for site	<p>Exceptional Circumstances Conclusion and Proposed Allocation</p> <p>In conclusion, the exceptional circumstances to justify the release of the Brethren Hall site from the MOL are:</p> <ol style="list-style-type: none"> 1. The site makes a very limited contribution to the purpose of including land within the MOL, as it comprises land which is developed and urban in nature, is private and entirely fenced off and does not include any features of national or metropolitan value; and 2. Its release for replacement and enhancement community use(s) development would: <ul style="list-style-type: none"> i Help meet the identified need for community facilities in the Borough where there are limited alternative options; ii Do so on an established and sustainable location for a higher quality community facility, utilising the site’s location adjacent to Sedgehill School to provide further benefits; and iii Enable the greater optimisation of an underutilised, private brownfield site and an opportunity to provide an area of enhanced landscaping. <p>The proposed allocation plan (Appendix 5 of attached Appendix 1), demonstrates how release of the Brethren Meeting Hall site could work to the benefit of the wider MOL swathe. In particular there is an opportunity for an allocation for Community Use, to enhance the existing site’s (absent) contribution to the designated South East London Green Chain by replacing the existing (gated) built</p>	The call for site submission for the Brethren Meeting Hall site is noted. We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.	No change.

			development and parking with better quality development, and enhanced landscaping. If this were to be publicly accessible; not private, as at present it could improve the permeability east to west and north to south. Accordingly, it is requested that the site should be removed from the MOL and allocated for redevelopment to provide a new ‘flexible’ community use development, for example, to provide a place of worship / religious use or other community uses such as, health clinics, schools, community centres and public leisure centres (consistent with draft LBL Plan para 9.1 /Glossary ‘community facilities’).		
Notting Hill Genesis (Savills obo)	- -	General Call for site	<p>LEWISHAM LOCAL PLAN REGULATION 18 STAGE MAIN ISSUES AND PREFERRED APPROACHES DOCUMENT FORMAL CONSULTATION REPRESENTATIONS SUBMITTED ON BEHALF OF NOTTING HILL GENESIS</p> <p>We are instructed by Notting Hill Genesis (NHG) to submit representations in response to the Lewisham Local Plan Regulation 18 ‘Main Issues and Preferred Approaches Document’ January 2021 (“the draft Local Plan”) in the context of their land ownership at 1-25 Malham Road Industrial Estate (“the site”), located within the London Borough of Lewisham (LBL).</p> <p><i>Notting Hill Genesis</i> NHG are a non-profit housing developer, member of the G15 group of major London housing associations and a registered provider of social housing. NHG own and manage more than 65,000 homes in London and the southeast. NHG work in the community, providing homes for around 170,000 people along with social programmes, economic regeneration initiatives and the services and support residents’ needs. 627 of these homes are in Lewisham, which are a mixture of Care and Support, General Needs, intermediate tenures and Temporary Housing, NHG are keen to extend their reach within Lewisham and help the Council deliver their strategic goals and housing targets.</p> <p>NHG’s primary purpose is to provide homes for lower-income households in and around London. NHG have a record of strategic regeneration across London to deliver high quality market and affordable housing. NHG excel in creating high quality new homes and provide a wide range of housing solutions, working closely with residents and partners to meet local needs.</p> <p><i>Site and Planning Policy Context</i> The site is circa. 0.57 hectares and is bound by Beadnell Road to the west, Dalmain Road to the north, industrial units to the east and Malham Road to the south. The site comprises of five, single storey industrial buildings accessed via a private entrance off Malham Road and accommodates 23 commercial units currently used for light industrial and storage (Use Classes B2 and B8) and office uses (Use Class E, formerly B1). The site forms part of the wider Malham Road Industrial Estate, which is circa 3.63 hectares and accommodates a mix of uses including a place of worship, hot food takeaways and residential uses.</p> <p>The wider area on Beadnell Road and Dalmain Road comprise of predominantly residential uses within two and three storey Victorian terraces. The site is situated in close proximity to Forest Hill District Town Centre, which lies approximately 800m (9 minute walk) south of the site and contains numerous shops, services and community facilities.</p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

			<p>The site has a Public Transport Accessibility Level (PTAL) rating of 2, indicating moderate accessibility to public transport out of a maximum score of 6b. The site is located approximately 800 metres (9 minute walk) from Forest Hill Station, providing access to Southern and London Overground services. There are also a number of bus stops located on A205 Stanstead Road, providing access to Lewisham Shopping Centre and Plumstead. The site is subject to the following adopted (current) planning policy designations:</p> <ul style="list-style-type: none"> • Forms part of site allocation ref.SA50 Malham Road Local Employment Location; • PTAL 2; • Flood Zone 1; and • The building is not locally or statutorily listed, nor are there any locally or statutorily listed buildings located in the immediate surrounding area. The site is not located within a Conservation Area. 		
Notting Hill Genesis (Savills obo)	-	Call for site	<p><i>LB Lewisham officer note: Appendix A Plan of the Site is included in the original representation. It shows the site boundary outlined in red.</i></p> <p>The site has significant redevelopment potential and we consider it could deliver a mixed use redevelopment comprising new residential uses, including affordable housing and continued use and re-provision of high quality employment floorspace. A ‘Call for Sites’ form and plan have been completed submitted separately.</p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Notting Hill Genesis (Savills obo)	-	Call for site	<p>The draft Local Plan should allow a mixed use redevelopment at this site (and potentially the wider Malham Road Industrial Estate) to include the delivery of employment and residential uses. This would incentivise a range of future redevelopment options and would provide a robust approach to withstand current and future challenges. Risks has been exacerbated due to the ongoing period of uncertainty as a result of the potential impacts of Brexit and the COVID-19 pandemic. Given the overall dated status of Malham Road Industrial Estate, a mixed use redevelopment would provide more certainty to support the long-term viability of the site as a successful and sustainable employment location, as well as providing the opportunity to deliver other public benefits e.g. affordable housing.</p> <p><i>LB Lewisham officer note: Appendix A Plan of the Site is included in the original representation. It shows the site boundary outlined in red.</i></p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Notting Hill Genesis (Savills obo)	- -	General Call for site	<p>Public Examination</p> <p>On behalf of our client we consider it is necessary to participate in the Examination in Public (EiP) in due course, including attending the oral part of the EiP. We would be grateful if you could keep us updated.</p> <p>Conclusion and recommendations:</p> <p>Whilst NHG are generally supportive of the ‘spirit’ of the draft Local Plan which seeks to improve employment provision and provide new homes and new affordable homes, there are a number policies which require further consideration and updating as elaborated in this letter.</p> <p>The policies mentioned above – primarily the Council’s approach to Locally Significant Industrial Sites and the Co-location of residential uses – in their current form the drafting would constrain potential redevelopment options at the site (and potentially to the wider Malham Road Industrial Estate). The draft</p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

			<p>Local Plan as currently drafted is not effective in its delivery, would not be consistent with national policy and would not be consistent with the London Plan. The draft Local Plan as currently drafted is therefore not sound. However, with further amendments (as noted above), we consider there is the potential that the draft Local Plan could be sound. It is considered that the suggested amendments will allow development to be optimised in the borough and for housing to be delivered ambitiously to meet housing need.</p> <p>To reiterate, the site has significant redevelopment potential and we believe it could provide a mixed use redevelopment comprising new residential uses, including affordable housing and continued use and re-provision of high quality employment floorspace. NHG are committed to working with the Council to help deliver their strategic goals, the regeneration of sites in the borough and benefits to local communities.</p> <p>We would be delighted to also meet with officers and other relevant parties to further discuss the site’s opportunities. Please do not hesitate to contact us to arrange a meeting, and/or if you have any further queries. In the meantime we would be grateful if you could keep us updated on the progress of the draft Local Plan.</p>		
Notting Hill Genesis (Savills obo)	-	Call for site	<p><i>LB Lewisham officer note: a Call for sites submission form and map showing the site boundary are included in the original representation.</i></p> <p>Site name and address: 1-25 Malham Road Inudstrial estate, Lewisham SE23 1AH</p> <p>Proposed use(s): Mixed use redevelopment including industrial uses (Use Class E (formerly B1, B2, B8) and residential uses (Use Class C3).</p>	<p>The call for site submission for 1-25 Malham Road Industrial Estate is noted. We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.</p>	<p>No change.</p>
Stoken Properties Ltd (Boyer obo)	- -	General Call for site	<p>Re: Lewisham Call for Sites Application – 491-499 and 501-505 Southend Lane, SE26 5BL</p> <p>We write on behalf of our client, Stoken Properties Ltd, in response to the Council’s Call for Sites exercise as part of the new Local Plan consultation and to support the Council in delivering their spatial strategy.</p> <p>We set out below a brief description of the existing site and its surroundings, the site’s planning history and its future development potential. This Call for Sites submission is supported by the following documents:</p> <ul style="list-style-type: none">• Site Location Plan; and• Feasibility Study (prepared by Falconer Chester Hall Architects). <p>This Call for Sites submission should be read in conjunction with the representations made in relation to Lewisham’s Regulation 18 “Main Issues and Preferred Local Plan Document in respect of Policy EC5 (Locally Significant Industrial Sites) and Section 17 of the Plan – Lewisham’s South Area.</p> <p>Site and Surroundings</p> <p>Stanton Square comprises an island of land in the Bell Green and Lower Sydenham area of Lewisham, sandwiched between Stanton Way to the south and Southend Lane to the north. Our client’s site (“site”) comprises a triangular</p>	<p>Comments supplementary to the call for site submission are noted. Our response is set out below.</p>	<p>No change.</p>

		<p>parcel of land of approximately 0.31ha at the northern part of the wider Stanton Square site, fronting onto Southend Lane (please refer to Site Location Plan).</p> <p>Currently the site comprises single storey, dated buildings that were historically in warehouse and industrial use (Use Class B8). The existing buildings are of no architectural merit and are in a dilapidated state, and would need to be brought up to modern standards. The topography of the site slopes upwards from west to east.</p> <p>The site enjoys its own access, separate from other developments within Stanton Square, and is accessed via three dropped kerbs fronting Southend Lane (A2218). Whilst the site has a current PTAL score of 3 it is considered to be in an accessible location due to the close proximity of a number of bus stops and the fact that Lower Sydenham Station is within easy walking distance, approximately 520m to the south east of the site. It is also worth taking into consideration that should the Bakerloo Line Extension be successful, the site will become even more accessible.</p> <p>Abutting the site to the south is the access self storage development which stands at approximately 4.5 storeys tall. Access to the access self storage site is via its own dedicated access fronting Stanton Way to the south.</p> <p>To the south east of the site is the Coventry Scaffolding site, which comprises a 2 storey office building which borders the site to east and behind this, a large yard used for the parking of vehicles and storage of scaffolding materials.</p> <p>On the western side of Stanton Square is The Bell public House, a 2 storey building in retail use by Architectural Salvage and to the west of that building, a modern 3 storey building in residential use.</p> <p>To the north of the site, on the opposite side of Southend Lane is a stepped circular residential development of up to 8 storeys. Also to the north is the large Sainsbury's Savacentre supermarket and associated car park. Haseltine primary school is located to the south of Stanton Square, on the opposite side of Stanton Way.</p> <p>The surrounding area is characterised by a mix of commercial and residential uses.</p> <p>The site is currently designated as a Local Employment Location (LEL) and the majority of the site falls within an Area of Archaeological Priority.</p> <p>The site falls within Flood Zone 1 meaning it has a low probability of flooding.</p> <p>Planning History An online search has been undertaken of the Council's planning application database and returned the following results for the site:</p> <p><u>491-505 Southend Lane</u></p>		
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			<p>An application (Ref: DC/20/116853) for the change of use from B8 (warehouse storage) to a flexible use class between B8 (warehouse storage) and D1 (place of worship) was refused in September 2020.</p> <p>In February 2003 an application (Ref: DC/02/052725/FT) was refused for the display of 2 x 96 sheet partially illuminated advertisement hoarding. However, the subsequent appeal was allowed.</p> <p>An application (Ref: 95/004568) for the display of a 48 sheet free standing hoarding was allowed in May 1995.</p> <p>In March 1993 an application (Ref: 93/036209) for the change of use to a lithographic printing and print finishing unit was submitted. However, it is unknown if this application was approved.</p> <p><u>Other Sites</u></p> <p>An application (Ref: DC/17/102967) for the construction of a four-storey building to provide a 8,279 sq.m Self-Storage unit (Use Class B8) and 962 sq.m office space (B1), together with the installation of a 3 metre high security boundary fence, two sliding gates to the front, provision of 16 car-parking bays (including 2 disabled spaces) and 24 secure cycle spaces, refuse and recycling stores and associated landscaping was approved in March 2018. This relates to the adjacent access self storage development to the rear of the site.</p> <p>Prior to the approval of the access self storage development, an application (Ref: DC/16/095614) was approved in June 2016 for the construction of a builders merchants warehouse (B8) (1,200 sq.m) with a mezzanine floor (428 sq.m) to provide ancillary office/staff facilities, a trade area, a covered loading bay at the rear of Stanton Square Industrial Estate, together with the creation of a new vehicular access onto Stanton Way, the provision of 17 parking (including 1 disabled) and 6 cycle spaces, installation of a 3m high security boundary fence, 2 sliding gates to the front, refuse and recycling stores and associated landscaping.</p> <p>A previous application to both the above (Ref: DC/08/070032/X) was granted in November 2008 for the demolition of two buildings and the construction of a four storey, L-shaped building, incorporating fascia translucent panel with illuminated blue LED lighting to the top floor around the building, to provide self-storage (Use Class B8), (floor area 8,897 sq.m) with office facilities (Use Class B1), (floor area 530 sq.m), together with the installation of four metre high boundary fencing and gate to the front, with lights on the perimeters facing downwards and the provision of landscaping, bicycle/bin stores and 16 car parking spaces, including 2 for use by the disabled.</p>		
Stoken Properties Ltd (Boyer obo)	- -	General Call for site	This application has been submitted on behalf of our client, Stoken Properties Ltd. Going forward, I would be grateful if I could be kept updated on the progress of the Local Plan and our Call for Sites application. I would also appreciate being kept updated and informed on any preparation or discussion of a Masterplan for the Bell Green and Lower Sydenham area as this is a process both my client and myself would like to be involved in given my clients interest in the area.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Stoken Properties Ltd (Boyer obo)	- -	General	Re: Representations to Lewisham’s Regulation 18 “Main Issues and Preferred Approaches” Local Plan Document	Comments supplementary to the call for site	No change.

		Call for site	<p>We write on behalf of our client, Stoken Properties Ltd, in response to the recent publication of Lewisham’s Regulation 18 “Main Issues and Preferred Approaches” Local Plan Document. This letter makes representations to the Local Plan and focuses on Policy EC5 (Locally Significant Industrial Sites (LSIS)) and Section 17 – Lewisham’s South Area. The letter sets out our client’s response to a number of item in the draft Local Plan and provides comment on the relevant policies and allocations.</p> <p><i>Introduction</i></p> <p>This letter outlines Stoken Properties Ltd. response to the recently published Regulation 18 “Main Issues and Preferred Approaches” Local Plan Document. Stoken Properties Ltd. have an interest in the Stanton Square Locally Significant Industrial Site (LSIS) and policies relating to it, namely Policy EC5.</p> <p>Stoken Properties Ltd are the freehold owners of the northern area of the site identified on the accompanying Site Location Plan, known as 491-499 and 501-505 Southend Lane. At the time of writing, our client is exploring future development opportunities for the site in order to maximise its efficiency and planning potential.</p> <p>It should be noted that the site has also been promoted via the Council’s Call for Sites exercise and both representations should be read in conjunction with each other.</p>	submission are noted. Our response is set out below.	
Stoken Properties Ltd (Boyer obo)	- -	General Call for site	<p><i>Summary and Conclusions</i></p> <p>These representations have been made on behalf of Stoken Properties Ltd. in response to the recent publication of Lewisham’s Regulation 18 “Main Issues and Preferred Approaches” Local Plan Document. The document details draft policies, which are intended to guide future development within the London Borough of Lewisham.</p> <p>Whilst we are in general support of the proposed policies we feel clarification and flexibility is required in regards to what is meant by industrial “capacity” and also the requirement for 50 per cent affordable housing if it is unviable and would prevent a site being developed.</p> <p>I trust the above is sufficient in the first instance but should you require any further information or need clarification on any of the points raised, please do not hesitate to contact me.</p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Stoken Properties Ltd (Boyer obo)	-	Call for site	<p>Background</p> <p>Whilst we understand that a separate call for sites application has been made in respect of the adjacent Coventry Scaffolding site, our client wishes to submit a separate application for this site to ensure its planning potential is captured within the Call for Sites exercise and it is promoted for development going forward either as part of a wider application for the entire Stanton Square site or individually.</p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Stoken Properties Ltd (Boyer obo)	-	Call for site	As advised, this representation is supported with a Call for Sites application for the element of Stanton Square that falls under the ownership of Stoken Properties Ltd., namely 491-499 and 501- 505 Southend Lane. Whilst we are supportive of the overall site’s allocation for mixed-use development within the Draft Local Plan, we feel it is important that, especially given the Council’s acknowledgement that some development sites will need to be phased, our	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

			client’s site is considered independently as well as part of the overall Stanton Square site.		
Stoken Properties Ltd (Boyer obo)	-	Call for Site	<p>Development Potential</p> <p>Whilst it is encouraging to see the wider Stanton Square site included as an allocation within the Regulation 18 Local Plan, we feel it is important that the subject site is considered individually as well as part of the wider Stanton Square allocation. As the Council have acknowledged, development of the wider Stanton Square allocation may be phased development and so we wish to establish the quantum of development acceptable for the subject site.</p> <p>The site is considered to present an excellent opportunity for redevelopment for the co-location of commercial and residential uses (Use Classes E/B1, B8 and C3) as well as public realm enhancements. The site is deliverable and development could take place relatively soon depending on the site’s allocation within the new Local Plan.</p> <p>As demonstrated within the accompanying Feasibility Study prepared by Falconer Chester Hall Architects (FCH), the site can successfully accommodate a high quality, mixed-use development. It is considered that a 6 storey development could be easily accommodated at this location, taking its lead from the heights of surrounding developments.</p> <p>In terms of the commercial floorspace, as depicted within the Feasibility Study, the ground floor can be divided into a number of commercial units to accommodate a number of commercial units and make a much more efficient and sustainable use of the site.</p> <p>As can be seen, any future development of the site could comfortably accommodate circa. 1,700 sq.m of commercial floorspace which would not result in a significant impact on overall capacity and would in fact, create more jobs than currently exist at the site.</p> <p>In terms of the residential element, the Feasibility Study shows that approximately 50 high quality units, which all exceed the national space standards, could be provided on site. These units would benefit from their own access as well as their own dedicated refuse and cycle stores.</p> <p>FCH have shown a scheme that comprises an acceptable unit mix of 40no. 2 bed units, 5no. 1 bed units and 5no. 3 bed units. Whilst it is acknowledged that this is a Call for Sites exercise and not a planning application, nevertheless, the fact that this unit mix, including 5no. family sized units, can be comfortably accommodated at the site should be seen as positive by the Council and the optimal capacity of the site being achieved.</p> <p>In terms of the quality of units, FCH have shown that all units can be designed so as to exceed the national space standards, thus ensuring a good quality of life for future occupiers. Further to this, all units benefit from their own policy compliant level of private amenity space in the form of balconies. As well as private amenity space, proposals can also provide shared amenity space that will have the added benefit of softening the impact of development and providing a better outlook for future occupiers.</p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

			<p>The Feasibility Study shows that the site can successfully accommodate a mixed-use development and that the mix of commercial and residential can work in harmony without detriment to the amenity of either use. The overall height and quantum of development detailed within the Feasibility Study is considered acceptable. At 6 storeys, any future development will fit in well with the surrounding area and would not be considered to be overly dominant or overbearing.</p> <p>Due to the site’s good accessibility level, which could increase following the Bakerloo Line Extension, a car free development is considered acceptable at this location and should be supported by planning policy.</p> <p>A mixed-use development comprising commercial uses at ground floor level with residential above is considered appropriate and in line with the Council’s wider ambitions for Stanton Square and the Bell Green and Lower Sydenham area. In terms of the quantum of commercial floorspace, whilst we acknowledge and support the Council’s ambition that there should be no net loss of employment capacity, we would argue that a well-designed development with appropriate commercial/employment floorspace that, whilst perhaps maybe smaller in overall floor area, can accommodate a greater number of employees, is a more efficient use that does not result in an overall loss of capacity. A flexible and pragmatic approach is required and we provide further comment in our representations to the Regulation 18 Local Plan document. However, as shown in the Feasibility Study a significant amount of commercial floorspace at circa 1,700 sq.m can be provided as part of any future development which is considered acceptable and in line with draft Local Plan Policy EC5.</p> <p>As discussed above, the existing buildings on site are dated and would need to be brought up to modern standards making their refurbishment unviable and impractical. A more efficient and sustainable use of the site would be for its mixed-use redevelopment. Whilst the existing buildings have a large floorspace, they are not considered to be being used efficiently due to the low number of employees at site. With evolving working practices, it is considered that smaller, useable employment floorspace that can accommodate more employees is a much more efficient and sustainable use of space and maximises the development potential of a site. The Feasibility Study therefore shows that any future mixed-use development would not result in a net loss of employment capacity.</p> <p>The Feasibility Study demonstrates that the site at 491-499 and 501-505 Southend Lane can be successfully developed independently from the rest of the Stanton Square site, but in such a way that will not compromise existing operational requirements or future development of the wider Stanton Square site.</p> <p>The site presents an excellent opportunity to help the Council realise its ambitions for the Bell Green and Lower Sydenham area and its development could act as a catalyst for further development. The site should therefore be allocated for mixed-use development in the Council’s new Local Plan.</p>		
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			<p>Summary</p> <p>Whilst the Council’s ambitions for the redevelopment of the entire Stanton Square site are supported, a separate Call for Sites submission for the site at 491-499 and 501-505 Southend Lane has been put forward as the site can be delivered within 5-10 years independently. Whilst the site can be delivered independently, any development of the site would be required to take into consideration how it would fit in with the wider Stanton Square redevelopment when that comes forward. It has been shown that development of the site will not compromise or prejudice either the existing operational requirements of other sites within Stanton Square or the future development of Stanton Square. It is felt that 491-499 and 501-505 Southend Lane can act as a catalyst and facilitator for the regeneration and redevelopment of the wider Stanton Square allocation and will encourage further development to come forward.</p> <p>Not only will the redevelopment and regeneration of this part of Stanton Square encourage the regeneration of the rest of the Square but it should also act as a catalyst for the regeneration of the wider Bell Green/Lower Sydenham area. Its redevelopment will bring significant social and economic benefits to the locality and Lewisham as a whole.</p> <p>The Council, in both draft Local Plan Policy EC5 and the Stanton Square allocation, support co-location of commercial and residential uses provided they would not result in a loss of overall employment capacity at the site. The Feasibility Study has shown that a sensitive mixed-use development that ensures there is no real loss of commercial floorspace whilst delivering high quality residential accommodation is achievable at the site and would make a much more efficient use of a site in an accessible and sustainable location.</p> <p>The site at 491-499 and 501-505 Southend Lane meets all the criteria the Council listed in its Call for Sites exercise. The site is over 0.25ha, could easily accommodate more than 10 residential units and more than 500 sq.m commercial floorspace and is in an accessible location as well as being located within an area that has been earmarked for regeneration, namely the Bell Green and Lower Sydenham Area. It is worth confirming that the site owner is very keen to work with the Council to bring the site forward and would welcome the opportunity to be involved in the preparation of a masterplan.</p> <p>I trust the above is sufficient in the first instance but should you require any further information or need clarification on any of the points raised, please do not hesitate to contact me.</p>		
Stoken Properties Ltd (Boyer obo)	-	Call for site	<p><i>LB Lewisham officer note: a Call for sites submission form, site feasibility study and site location plan showing the site boundary are included in the original representation.</i></p> <p>Site name and address: 491-499 and 501-505 Southend Lane, SE26 5BL</p> <p>Proposed use(s): Mixed use comprising commercial/office (Class E/B1), warehouse/storage (B8) and residential uses (C3).</p>	The call for sites submission for 491-499 and 501- 505 Southend Lane is noted. There is no need for an individual site allocation on this site as it is already included in the Stanton Square LSIS site allocation. It also recognises that	No change.

				development must be delivered in accordance with a site masterplan to ensure the appropriate colocation of employment and other uses across the site. Comments to additional representations are set out elsewhere in the Consultation Statement.	
Freeths LLP (K/S Lewisham obo)	-	Call for Site	<p><i>LB Lewisham officer note: a Call for sites submission form is included in the original representation.</i></p> <p>Site name and address: 150-154 Lewisham High Street, SE15 6JL</p> <p>Proposed use(s): replacement retail use and residential.</p> <p>We act on behalf of K/S Lewisham (“K/S”) and have been instructed to submit the following representation to the Local Plan consultation. This is in the context of a site known as 150-154 Lewisham High Street which is under their freehold control and management.</p> <p><i>LB Lewisham officer note: Appendix 1: the extent of the site is included in the original representation.</i></p>	The call for sites submission for 150-154 Lewisham High Street is noted. There is no need for an individual site allocation on this site as it is already included in the Lewisham Shopping Centre site allocation. Further comments to additional representations are set out in the Lewisham Shopping Centre site allocation above.	No change.
Kier Property (Carter Jonas obo)	- -	General Call for site	<p>LAND SURROUNDING THE LIVESEY MEMORIAL HALL, BELL GREEN, SYDENHAM</p> <p>Carter Jonas on behalf of our client Kier Property, welcomes the opportunity to submit representations to the Lewisham Local Plan Regulation 18 stage “Main Issues and Preferred Approaches” document. Our client supports the preparation of the Local Plan and welcomes the proposed strategy for utilising land at Bell Green for alternative uses. In particular, the strategic and longer-term aspiration for Bell Green Retail Park’s contribution towards a residential-led mixed-use development.</p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Kier Property (Carter Jonas obo)	-	General Call for site	<p>Kier Property can confirm the availability of its redundant landholding known as Land to the rear of the Livesey Memorial Hall in its ability to contribute towards the Council’s growth strategy. The accompanying Site Location Plan identifies the extent of the land outlined in red comprising land to the north and east of the former Bell Green Gasholders, the Livesey Memorial Hall and its land to the north and south of this building. The land outlined in blue represents a long-term freehold for Kier Property. These representations relate specifically to the land outlined in red.</p> <p><i>LB Lewisham officer note: a site location plan showing the site boundary is included in the original representation.</i></p> <p>Our client requests that the land is formally identified for redevelopment as part of wider Bell Green redevelopment proposals where there is a clear and unequivocal relationship between the Site and the regeneration opportunity for a long term residential-led development.</p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

			<p>For the avoidance of doubt, our client’s land ownership includes the Grade II Livesey Memorial Hall. Kier Property recognises the importance of this heritage asset to the character of the surrounding area and it is not the intention to propose the building for redevelopment. These representations promote the residual and dilapidating surrounding land of the Livesey Memorial Hall, which in the interests of proper planning should be included as part of the wider Bell Green strategic allocation area.</p> <p>In this regard, with the inclusion of our client’s land in the wider site, we support the Council’s vision in the context of a wider placemaking area around Bell Green.</p>		
Kier Property (Carter Jonas obo)	- -	General Call for site	<p>Site Background</p> <p>The Site is accessed via the existing Bell Green retail park located off Perry Hill, to the north of the former Bell Green Gas Works site. In the context of its surroundings, the residual land surrounding the Livesey Memorial Hall lies vacant, slowly falling into disrepair as a result. It is unsightly and overgrown but has potential to contribute to the Council’s requirement for residential homes.</p> <p>The Bell Green Gasholders shown on the plans have recently been removed by Southern Gas Network and the site forms part of Site Allocation 1 The Former Bell Green Gasholders.</p> <p>The principle of development on the Site is supported both at national, regional and local level. The Site, by virtue of its previously developed nature would support the rhetoric to make the most efficient use of brownfield land.</p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Kier Property (Carter Jonas obo)	- -	General Call for site	<p>Strategic Matters</p> <p>In line with national policy, there are a number of strategic matters that are identified in the draft Local Plan which are relevant to the future determination of the most deliverable and sustainable options of the Borough. A key matter of which, is the extent of the housing needs arising in the Borough. In simple terms it is the responsibility of the Council to plan to meet it over the plan period.</p> <p>The NPPF also states the Government’s commitment to ensuring the planning system does <i>everything it can</i> to support sustainable growth. We are pleased to see that progress has been made on the Council’s evidence base that supports the identification of key growth opportunities on brownfield land, in parallel with key infrastructure delivery. An up-to-date evidence base should provide a sound basis for the plan and consultation on its content will help ensure local communities and other interested parties are aware of the issues considered by the Council in the preparation of a Local Plan. Ultimately the delivery of early and well-designed new homes for the Borough’s growing population must, and can be achieved in this plan period.</p> <p>A ‘new’ London Plan was recently published by the Mayor of London and provides a number of strategic considerations for the Council to grapple with. The current Local Plan consultation document was produced prior to its publication and therefore any relevant matters drafted into the final London Plan should be accommodated and consulted upon in the next consultation opportunity.</p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	Local Plan amended to accord with the adopted version of the London Plan.

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Kier Property (Carter Jonas obo)	- -	General Call for site	Thank you once again for the opportunity to respond to the Local Plan consultation. We would be grateful for confirmation that these representations have been received and confirm that we would like to be involved in future stages of the Local Plan process.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Kier Property (Carter Jonas obo)	-	Call for site	<p>We consider that the site is well located to contribute towards the vision outlined by the wider Bell Green site allocations and therefore should be considered for inclusion within their boundary. Specifically, against the site allocation objectives and development guidelines, the site is:</p> <ul style="list-style-type: none">• Capable of being available, constraint free and deliverable in the short term;• Capable of contributing towards delivering a high-quality development whilst offsetting any perceived harm to the Grade II Livesey Memorial Hall.• Provides the potential to increase the density on site to deliver a cohesive high quality residential and mixed-use development;• Contribute toward wider placemaking objectives and the Council’s promotion of the wider Bell Green area as an Opportunity Area in the next review of the London Plan;• It is well located adjacent to an existing settlement with associated services and facilities – it is a key transition site from the entrance of the Bell Green Retail Park to the longer term development across the site. <p>Summary</p> <p>In summary, these representations confirm that the land to the rear of the Livesey Memorial Hall, Bell Green can be considered for inclusion within the wider Site Allocations at the Bell Green Retail Park.</p> <p>Kier Group would welcome the allocation of their landholdings as it relates to Bell Green, to allow for a comprehensive development and allow for a broader range of uses. The site allocation’s location within the Bell Green area would allow for this site to act as a catalyst for regeneration of the wider area and the early delivery timeframe is supported.</p>	The call for site submission for Livesey Memorial Hall is noted. Agree that there is merit in including this site within the Former Bell Green Gas Holder site allocation. The site’s capacity takes into account the need to protect the setting of the Grade II Livesey Memorial Hall and retain the openness of the bowling green and tennis courts.	The former Bell Green Gas Holder site allocation has been amended to include the site of the Livesey Memorial Hall.
Austringer Capital Ltd (Tetlow King Planning obo)	- -	General Call for site	<p>Introduction</p> <p>Section 1</p> <p>1.1 These representations are made by Austringer Capital Ltd in respect of the Regulation 18 Issues and Options consultation on the emerging Lewisham Local Plan. We welcome this opportunity to comment on the emerging strategy and policies.</p> <p>1.2 Austringer Capital Ltd has development interests at the former Willow Tree Riding Establishment, Ronver Road, Hither Green. The site comprises 5.6 hectares of land, historically owned by British Rail in connection with the Channel Tunnel rail link. A riding establishment operated from the 1950s to 2015 and a proposal for replacement riding facilities is presently subject to a planning appeal.</p> <p>1.3 At present, the site is disused, heavily overgrown, and subject to misuse including trespass, vandalism and fly-tipping. Through the Local Plan process, there is the opportunity to allocate the site for development, to ensure the site can be returned to beneficial use and to provide for the long term management</p>	Comments -supplementary to the call for site submission are noted. Our response is set out below.	No change.

			<p>and maintenance of the site. The site comes forward in a sensitive planning context, which has informed the development options for the site.</p> <p>1.4 These representations are structured as follows:</p> <ul style="list-style-type: none">• Section 2 discusses the site and the key planning issues including site constraints and opportunities;• Section 3 discusses the potential uses of the site;• Section 4 provides comments on specific policies in the Plan.		
Austringer Capital Ltd (Tetlow King Planning obo)	-	General Call for site	<p>The Site</p> <p>Section 2</p> <p>2.1 The site comprises 5.6 hectares of land forming a long narrow strip between extensive residential development to the east, and the South Eastern Main Line railway to the west.</p> <p><i>LB Lewisham officer note: Figure 2.1: Site Location Plan is included in the original representation.</i></p> <p>2.2 The site is largely undeveloped, save for an equestrian stable accessed from Ronver Road (disused since 2015) and other small structures found across the site. There are areas of hardstanding, paddock and scrubland throughout the site. Certain areas are heavily treed with some of the trees being subject to an area-wide Tree Preservation Order. There are areas of Japanese Knotweed, an invasive species, towards the north of the site.</p> <p>2.3 Historically, the site was owned by British Rail (“BR”) and featured in early plans for the Channel Tunnel Rail Link. These plans were abandoned by BR in the 1990s and the site then remained undeveloped (save for the riding establishment).</p> <p>2.4 Unfortunately, with the site being disused for several years, it has fallen into a state of degradation and is subject to vandalism, trespass and fly-tipping. Extant buildings and structures are in a poor condition. In order to secure the future maintenance and management of the site, it is Austringer Capital’s case that the site should be brought back into use. Doing nothing is not an option, since the site will continue to be misused and will continue to deteriorate.</p> <p>2.5 The site has historically been in equestrian use, with the former Willow Tree Riding Establishment operating from the 1950s until its closure in 2015. In recent years, permission has been sought for a new equestrian facility:</p> <ul style="list-style-type: none">• An application for development of “<i>erection of private stables, removal of trees and laying out of 3 no. paddocks</i>” (DC/13/83518) was dismissed on appeal in 2014. Key concerns raised by the Inspector related to uncertain impacts in relation to biodiversity and trees at the site. The Inspector considered that the proposed built form was compatible with the Metropolitan Open Land designation at the site; that there would be no unacceptable adverse impact on residential amenity; and that the proposed development was acceptable in principle. Taking a precautionary approach the Inspector dismissed the appeal.	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

		<ul style="list-style-type: none">• A application for a revised scheme of “<i>Demolition of the existing stables and the construction of new equestrian facilities to include stalls, a barn shelter, tack building, reception/office, and a perimeter track for riding, at Willow Tree Riding Establishment Ronver Road SE12, together with use of the existing access onto Ronver Road and associated works</i>” (DC/19/111719) sought to respond to the issues raised through the previous appeal. The application was refused with four reasons for refusal, relating to an alleged urbanising impact upon the Metropolitan Open Land designation, loss of trees that detract from the Tree Preservation Order and the MOL designation, the internal highways and pedestrian layout, and amenity impacts upon adjacent dwellings. It is Austringer Capital Ltd’s case that the proposed development is acceptable in these respects. The scheme is currently the subject of a live planning appeal which is due to be heard in Summer 2021. <p>Site constraints</p> <p>2.6 The site is subject to several constraints, which include:</p> <ul style="list-style-type: none">• Designation as Metropolitan Open Land (“MOL”);• Designation as a Site of Importance for Nature Conservation of boroughwide significance (reference LeB29);• Designated at its northernmost extent as an Urban Open Space subject to policy CS12 in the current Core Strategy;• An area Tree Preservation Order, made in 2012;• Noise arising from the adjacent operational railway. <p>2.7 These key site issues are discussed below.</p> <p>Metropolitan Open Land</p> <p>2.8 Adopted London Plan policy 7.17 ‘Metropolitan Open Land’ sets out the policy approach to Metropolitan Open Land. It continues the longstanding approach that MOL benefits from the same level of policy protection as Green Belt, albeit that the functions of MOL are different. Policy 7.17 explains that inappropriate development should be refused except in very special circumstances.</p> <p>2.9 Policy 7.17 lists the criteria for designation of MOL:</p> <ul style="list-style-type: none">• it contributes to the physical structure of London by being clearly distinguishable from the built up area;• it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London;• it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value;• it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria <p>2.10 The site’s status as Metropolitan Open Land was re-appraised in 2020 as part of a Metropolitan Open Land Review undertaken by Arup (the “MOL Review”). The site is identified as part of ‘MOL Area 6’; the Area Assessment</p>		
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			<p>Summary shows the site either performs ‘weak-moderate’ or ‘moderate’ against the assessment criteria, however the land is recommended for retention as part of the MOL.</p> <p>2.11 The Annex Report to the MOL Review explains how these conclusions were reached, noting that the strongest contribution was found to be to the first criterion, as the site is heavily vegetated and contributes to the overall structure of built form. The site performed weakly in terms of the second and third criteria, due to the lack of public access; it is stated to be of “<i>no value to the local community</i>”. The site performed better in terms of the fourth criterion in light of other nearby green infrastructure connections.</p> <p>2.12 In light of the MOL Review’s recommendations, Austringer Capital recognises that any development of the site must come forward in accordance with the MOL policy designation. This has a significant bearing upon the proposals for the site, which seek to maintain the openness of the site, remain compatible with the MOL designation, with only limited built form.</p> <p>Ecology</p> <p>2.13 The site is designated a SINC of boroughwide importance. The site forms part of the Hither Green Sidings SINC, which includes other adjacent parcels of land including that within the ownership of Network Rail.</p> <p>2.14 The ‘Re-survey of Sites of Importance for Nature Conservation in Lewisham’ was undertaken by the Council in 2016 and includes a habitat map of the site. This shows there to be large areas of scrubland, roughland, with smaller pockets of native woodland, a pond, tall herbs, and semi-improved neutral grassland. There are also areas of soil, rock and artificial habitat centred around the former equestrian centre.</p> <p>2.15 The SINC designation was reviewed by the Council in late 2021. The report is informed by a site visit of the Network Rail land. It finds that whilst there has been an increase in the biodiversity value of the site since the previous survey in 2016, it remains the case that the site does not fulfil the necessary criteria to be upgraded to a Site of Metropolitan Importance.</p> <p>2.16 Austringer Capital is aware that there are objections to the current appeal scheme on ecology grounds. It is important to note that the SINC designation is not a blanket restriction on all development. Policy G6 of the London Plan 2021 requires that “<i>Sites of Importance for Nature Conservation (SINCs) should be protected</i>” and as such requires any development proposals to avoid harm to the biodiversity of SINCs (but where harm is unavoidable, to apply a hierarchy of mitigation). The current appeal is not subject to an ecology reason for refusal and the Council is satisfied that the matter can be addressed by way of condition.</p> <p>2.17 Overall, it is considered that ecological matters are an important constraint that must be factored into any scheme design, but that it is possible for development to come forward that preserves and enhances the main areas of ecological value in accordance with the SINC designation.</p> <p>Trees</p>		
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		<p>2.18 The site is subject to an area TPO, made in 2012. Area TPOs are frequently used to protect a large number of trees quickly and the Council is legally obliged to undertake a full assessment of the trees and groups covered by the order. The Area TPO may include trees which do not merit protection, and new trees and growth may make it difficult to establish which trees are actually protected under the TPO. It is therefore considered that a scheme design can come forward which respects and enhances high quality trees at the site, and that the TPO designation must be considered in the context of the above caveats.</p> <p>Open space designations</p> <p>2.19 The site is subject to existing and proposed Open Space designations. Under the emerging Local Plan, the site is considered under policy GR2 ‘Open Space and Lewisham’s Green Grid’ however Green Infrastructure and open spaces also form part of the broader spatial strategy for the East Area of Lewisham.</p> <p>Opportunities for the site</p> <p>2.20 The opportunities for the site are heavily influenced by these constraints, which require a careful approach to be taken to any scheme design. Opportunities include:</p> <ul style="list-style-type: none">• Restoring the site to beneficial use;• Protecting and enhancing the areas of acknowledged biodiversity importance; and• Provision of foot and cycle links throughout the site, achieving local objectives (set out in the emerging Grove Park Neighbourhood Plan) to provide a ‘linear parkland’ throughout the neighbourhood. <p>Restoring the site to beneficial use</p> <p>2.21 The primary aspiration is to bring the site back into beneficial use. In common with other London Boroughs, there are relatively few opportunities to bring development forward on sites of any significant scale. The National Planning Policy Framework emphasises the efficient use of land. With a limited supply of land in the Borough, It serves nobody’s purpose to leave sites such as this undeveloped. Conversely, there is the opportunity to deliver development that positively meets needs of the Borough’s growing population. The Local Plan is the key mechanism by which the Council can identify land for future use and an allocation of this site will ensure that the site can contribute to the overall success of the Borough.</p> <p>2.22 Development is also necessary to secure the site’s ongoing management and maintenance. At present the site is blighted by vandalism, fly-tipping and general degradation despite the efforts of the landowner to prevent this. Whilst there is no public access to the land, there have been numerous issues of trespass and break-ins to the site. It is an unfortunate fact that any site of this nature in this location will be susceptible to misuse and whilst efforts are made to secure the site, a determined individual may try to circumvent these measures. It is considered that a regular staff presence at the site and a proper management and maintenance regime will substantially reduce instances of trespass and misuse of the site.</p> <p>Protecting and enhancing biodiversity</p>		
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			<p>2.23 Development at the site offers the potential to achieve net gains in biodiversity. The Council’s own evidence base shows that whilst there are areas of habitat value within the site, these do not extend to the entire site area. There are, for example, areas of hardstanding. Existing habitats on site including dense scrub, woodland and open mosaic habitat provide opportunities for enhanced biodiversity through carefully considered management.</p> <p>2.24 Bringing development forward at the site would allow for a proper landscape and ecological management plan to be secured, with clear measures and objectives to secure biodiversity improvements.</p>		
Austringer Capital Ltd (Tetlow King Planning obo)	-	General Call for site	<p>Development Options Section 3</p> <p>3.1 The site constraints and opportunities have informed Austringer Capital’s aspirations and vision for the site. Any development must respond to the constraints on the site, chief amongst which are MOL, ecological and arboricultural considerations. This limits the potential for extensive built redevelopment of the site, but there is clear scope for a predominantly outdoor use to come forward where this preserves the open characteristics of this part of the MOL and responds to the other site constraints and opportunities as identified above.</p> <p>3.2 Three options are therefore proposed:</p> <ul style="list-style-type: none">• Provision of a modern riding establishment;• An alternative leisure use; or• Delivery of a combined cemetery and community use. <p>Riding establishment</p> <p>3.3 The site has been historically used for equestrian purposes and the current appeal scheme proposes a significantly upgraded equestrian facility. The submitted scheme allows for the provision of parking, access and new buildings concentrated around the footprint of the existing hardstanding and buildings. A perimeter track is proposed to run in a loop through much of the site. Existing high quality trees are to be protected and incorporated into the scheme design.</p> <p>3.4 The proposed riding establishment is compatible with the MOL designation. Paragraph 145b of the Framework allows for the provision of appropriate facilities for outdoor sport and recreation and through the appeal the Council has not objected to the principle of the development.</p> <p>3.5 The proposed riding establishment offers opportunities for biodiversity net gains to be achieved. As discussed in section 2, although the site is subject to a SINC designation covering the wider Hither Green Sidings, certain parts of the site are of limited ecological value. Development of a riding establishment allows large areas of the site to be retained, enhanced and properly managed for ecological value and improved biodiversity, offering greater ecological connectivity across local SINC.</p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

			<p>3.6 Through the appeal process Austringer Capital has set out the need for the proposed equestrian use. There are two riding establishments within 1.5km; New Lodge Farm which provides specialist riding facilities for adults and children with disabilities, physical, sensory and learning difficulties; and Mottingham Farm Riding Centre which serves the general public. At the time of writing, it advertised only two available livery spaces out of a total of 44.</p> <p>3.7 The extant structures at the site were built many years ago and are in a poor condition, unsuitable for retention or re-use. The expectations of customers have changed over time, with the proposed new facilities including modern stables and a barn shelter, formalised car parking, a reception and office building, a picnic area, and a trackway running throughout the site. Taken together, the proposed equestrian use would offer improved facilities from those extant at the site.</p> <p>3.8 Emerging policy CI2 ‘New and Enhanced Community Infrastructure’ supports the provision of new and reconfigured community facilities, where they are suitably located, where the development proposals are flexible, functional, available to the public, and appropriately managed, with no other significant adverse effects on neighbouring uses. In this context, paragraph 9.8 of the emerging Local Plan’s supporting text states that <i>“Community infrastructure is vital to securing inclusive communities and to meeting the needs of different groups within the Borough. We will therefore be broadly supportive of proposals involving new or enhanced provision”</i>.</p> <p>3.9 There is a demand for equestrian uses in the area and little spare capacity in existing facilities. The delivery of a modern riding establishment, designed to meet present-day needs and built to present-day standards, would be entirely consistent with the objectives of policy CI2. There is also the opportunity to secure proper long-term management at the site including in respect of ecology and general maintenance of the site.</p> <p>3.10 Paragraph 9.8 of the supporting text to emerging policy CI2 emphasises that the location of community facilities should be suitable for the community and groups that they serve. In this case, the site benefits from good access to road (with easy access to the South Circular Road) and public transport networks (including London Buses and National Rail) in the context of its suburban location away from the identified district centres.</p> <p>3.11 In terms of the spatial strategy, the proposed riding establishment is consistent with the vision for the East Area of Lewisham. Paragraph 16.6 of the emerging Local Plan emphasises the importance of quality parks, open spaces and green infrastructure in the East Area (discussed further at Section 4 of these representations). The proposed riding establishment allows for the site to remain open (in accordance with MOL policy) and can provide for proper management and maintenance of the site, to ensure that ecological interests can be protected and enhanced.</p> <p>3.12 Drawing the above together, there is a clear case that the Willow Tree Riding Establishment site is suitable for equestrian use and that emerging policy should support the provision of enhanced, modern facilities at the site. Whilst</p>		
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		<p>the appeal is currently considering site-specific technical matters and the design approach, it is clear that, in principle, the site is suitable for equestrian use.</p> <p>Alternative leisure uses</p> <p>3.13 Whilst the proposed equestrian use benefits from extensive design work and is currently being considered through the planning appeals process, there may be potential for an alternative outdoor-led leisure use. This may be explored further through the Local Plan process.</p> <p>Cemetery use</p> <p>3.14 There is a need for additional burial space in the London Borough of Lewisham. The most recent evidence base document for burial space requirements is the Audit of London Burial Provision prepared in 2011 by the Greater London Authority. For Lewisham, it notes that there are four cemeteries in total in the Borough, one of which is owned and operated by the London Borough of Bromley. At the time of the audit, it was estimated that there were around 56 years’ worth of burial capacity. However, some of the data in the audit such as burial rates date as far back as 1995. There are also limitations to the methodology in the audit, which notes at paragraph 2.31 that <i>“it becomes very difficult for a cemetery owner to make an accurate assessment of exactly how many grave spaces may be available in an existing cemetery. It is for this reason that the final assessment of the amount of space available in a given borough is very much an estimate, and depends on cemetery managers’ largely qualitative reporting and their understanding of which grave creation measures may release further space, and which measures have been exhausted or are not viable”</i>.</p> <p>3.15 Since the evidence base for cemetery requirements is dated, we have sought up-to-date information through a Freedom of Information request (“Fol”) provided at Appendix 2.</p> <p><i>LB Lewisham officer note: Appendix 2 FOI response is included in Appendix 2 in the original representation.</i></p> <p>3.16 Information was sought for the number of burials on an annualised basis between 2011/12 (the time of the GLA audit) and 2019/20 although data was only available for two of these years. In 2019/20 a total of 527 burials were recorded.</p> <p>3.17 Information was sought for 2020/21 to understand whether the COVID-19 pandemic has affected the rates of burials. All three cemeteries saw an increase in the year 2020/21 to date when compared with the previous year. In total 582 burials have been undertaken, a 10% increase against the previous year.</p> <p>3.18 Details of capacity in existing cemeteries were also sought:</p> <p>3.19 In total, there are around 2,050 remaining spaces, of which 1,250 are currently available and a further 800 require further investment to bring into use.</p> <p>3.20 With 527 burials recorded in 2019/20 across all three of Lewisham’s cemeteries, there are currently only enough spaces to meet 3.9 years’ worth of demand. The availability of burial space is therefore substantially less than was</p>		
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			<p>estimated in the GLA Audit, and points to a significant need for new burial space in the Borough over the course of the emerging Local Plan period.</p> <p>3.21 It is therefore necessary to provide additional burial plots in the Borough. Emerging Local Plan policy CI5 makes provision for this and explains that the Council intends to update its evidence base in this respect. The Local Plan process is an opportunity for the Council to make proper long-term provision for burial spaces. The former Willow Tree Riding Establishment site offers the potential to provide a cemetery that is well-located in relation to the community it serves, being close to both the long-established Hither Green and Grove Park cemeteries. Such an approach remains consistent with emerging policy CI3.</p> <p>3.22 Cemetery uses are compatible with Metropolitan Open Land designation. There are several instances where cemetery proposals have been considered, including at appeal, within the Green Belt, and have been found to be acceptable.</p> <p>3.23 Site specific benefits of providing a cemetery at the former Willow Tree Riding Establishment site include:</p> <ul style="list-style-type: none">• Proximity to existing cemeteries and associated facilities such as chapels of rest and the Crematorium at Hither Green;• The ability to secure biodiversity enhancements at the site, identifying those areas of greatest ecological value and securing their long term management and maintenance;• Provision of well-maintained open spaces for quiet contemplation;• Maintaining a predominantly open site with vegetation throughout as part of the wider network of Green Infrastructure identified in the emerging Lewisham Local Plan as well as the published London Plan;• Provision of footpath links as part of a ‘linear park’. <p>3.24 Access for vehicles via the South Circular Road; positive pre-application advice has been received from Transport for London that confirms that in principle, this access is acceptable.</p> <p>3.25 Initial design work for the site has been undertaken which indicates a potential capacity of up to 6,700 burial plots whilst retaining the trees at the site of greatest arboricultural value and maintaining a planted buffer to the adjacent railway and dwelling houses. This is subject to refinement through the design process. A capacity of 6,700 plots would provide an additional 13 years’ capacity assuming a burial rate of 527 per annum.</p>		
Austringer Capital Ltd (Tetlow King Planning obo)	-	General Call for site	<p>Summary and Conclusion</p> <p>Section 5</p> <p>5.1 These representations are made by Austringer Capital Ltd in respect of the Regulation 18 Issues and Options consultation on the emerging Lewisham Local</p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

			<p>Plan. We welcome this opportunity to comment on the emerging strategy and policies. Austringer Capital Ltd has interests at the former Willow Tree Riding Establishment, Ronver Road, Lewisham.</p> <p>5.2 The site measures some 5.6 hectares and has suffered from degradation since the closure of the previous riding establishment in 2015. The Local Plan presents the opportunity to allocate the site, to restore it to beneficial use.</p> <p>5.3 It is necessary to carefully consider the constraints at the site, which include Metropolitan Open Land, Site of Interest for Nature Conservation designations, and arboricultural interests. These are not ‘blanket’ restrictions on any form of development; they can be addressed through an appropriate scheme design.</p> <p>5.4 Moreover, it is possible to achieve meaningful benefits through development at the site, including the long-term management and maintenance of the site (including in respect of ecology and trees); restoring the site to use; the ongoing contribution of the site towards Green Infrastructure, and the potential to provide foot and cycle links dependent upon the scheme design. Emerging policies LEA4 and LEA5 contemplate the ability of some development to support wider objectives in respect of open spaces and community provision.</p> <p>5.5 We have proposed three potential uses at the site; equestrian use, an alternative outdoor leisure use, and a cemetery use. The proposed uses would help to meet local needs and are consistent with the site constraints, opportunities and the broader spatial strategy for the East Area of Lewisham. We would welcome the opportunity to discuss these in further detail with the Council as the Local Plan progresses.</p>		
Austringer Capital Ltd (Tetlow King Planning obo)	- -	General Call for site	<p>We welcome the opportunity to discuss the content of these representations further with the London Borough of Lewisham and are keen to be involved in the forthcoming examination process. In the meantime, should you wish to discuss any of the above please do not hesitate to contact us.</p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Austringer Capital Ltd (Tetlow King Planning obo)	-	Call for site	<p><i>LB Lewisham officer note: Call for Sites form is included in Appendix 1 in the original representation.</i></p> <p>Site name and address: Willow Tree Riding Establishment, Ronver Road, London, SE12 ONL</p> <p>Proposed use(s): Retention of riding establishment use; or alternative outdoor leisure use; or Cemetery use.</p>	The call for sites submission for Willow Tree Riding Establishment is noted. We are not adding site allocations at this stage of the plan process. This site may be considered through a plan review in due course.	No change.
Big Yellow Storage Company Limited (DWD obo)	-	General Call for sites	<p>LEWISHAM LOCAL PLAN: MAIN ISSUES AND PREFERRED APPROACHES (JANUARY 2021) - REGULATION 18 CONSULTATION REPRESENTATIONS ON BEHALF OF BIG YELLOW GROUP PLC</p> <p>These representations are submitted on behalf of our client, .Big Yellow Self Storage Company Limited (“Big Yellow”) to Lewisham Council’s consultation document ‘Lewisham Local Plan: Main Issues and Preferred Approaches (January 2021)’ (‘draft consultation document’).</p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.

			<p>Big Yellow owns the freehold interest of the land at 155 Lewisham Way, New Cross, London SE14 6QP (“the Site”) as shown on the appended map (Appendix A).</p> <p><i>LB Lewisham officer note: Appendix A: Map of 155 Lewisham Way is included in the original representation. The plan shows the site boundary in red.</i></p> <p>These representations relate to the Site and the ‘employment land’ chapter of the consultation document, as well as the proposed changes to the adopted policies map.</p>		
Big Yellow Storage Company Limited (DWD obo)	- -	General Call for Site	<p>I trust that the information provided clearly sets out Big Yellow’s position with regard to Lewisham’s new Local Plan. Please do not hesitate to contact me if any further clarification is required on the above.</p> <p>I would be grateful if you could please confirm receipt of these representations and keep me informed of any further consultations moving forward.</p>	Comments supplementary to the call for site submission are noted. Our response is set out below.	No change.
Big Yellow Storage Company Limited (DWD obo)	-	Call for site	<p>Site and Surrounding Area The Site is located within the boundary of Lewisham Council and extends to an area of approximately 0.46 hectares, located on the north-eastern side of Lewisham Way. The Site is occupied by a Big Yellow self-storage facility which fronts Lewisham Way, and a smaller building set back from the main road which is occupied by a number of industrial / commercial uses. Both buildings are accessed from Alexandra Cottages and have associated service yards and parking areas.</p> <p>Current Policy Position Within the adopted policies map the Site is located within the Lewisham Way Local Employment Location (LEL) which is one of 12 designated LELs within the Borough. In policy terms, LELs are protected for a range of uses within the B Use Class (B1, B8 and where appropriate B2 industry) and also appropriate sui generis uses, to support the functioning of the local economy. This policy protects the Site for continued industrial use, including for self-storage purposes (Class B8).</p> <p>Bakerloo Line Extension It is noted that the Bakerloo Line Extension safeguarding plans recently issued by Transport for London (TfL) safeguard the entire Site within an ‘area of surface interest’ for a new shaft. It is not known at this point whether all, some or none of the Site will be required for the BLE. Therefore any area that is not used or, indeed, once it has been used and is no longer required for the BLE, could come forward for employment development in the plan period.</p>	The call for sites submission for Big Yellow Storage Facility at 122 Lewisham Way is noted. This site is currently safeguarded for the BLE. This site may be considered through a plan review in due course, once there is certainty over the delivery timescales for the BLE and the exact land take for the BLE shaft is known.	No change.
Southern Gas Networks	-	General Call for sites	<p>After reviewing the Draft Local Plan and the section in the IDP specifically about SGN, I have no comments I wish to make at this time. That being said, I would like to offer our future support, especially after the Call for Sites has ended and a decision has been made on which sites are acceptable. If it benefits the council, I would be happy to analyse the impact of all potential Lewisham sites on the SGN gas network and provide a summary of my findings.</p> <p>I look forward to hearing from the council in the future.</p>	Comments noted.	No change.