

Compilation of Consultation Responses on the proposed use of the site of the former Watergate School (Church Grove SE13)

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12/11/2011

The Council is consulting on the former Watergate school site in Church Grove as the preferred location for a site for Gypsy and Traveller families.

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(Please use as many pages as you need.)

1. I live on Ladywell RD and one of my main concerns is parking. At the moment I have a parking permit and find it difficult to park near my home. With a travellers site at the end of Church Grove and the width of the road I can foresee that it is going to be more difficult to park.
 2. Church Grove is a ^{small} quiet residential street, have any travellers been to visit the proposed site? and what are their views on it as I thought they would have preferred more space away from an already set up community?
- Name Alia Bell Postcode SE13 7UT

(We are asking you to provide your postcode as we are looking to understand in which part of the borough participants in this consultation live.)

2

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(Please use as many pages as you need.)

All points made by local residents were pertinent

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(Please use as many pages as you need.)

~~A~~

Please consider ALL the points made by the local community members this morning at the consultation event.

I agree with each and every point —
12/11/11.

Also please note that Joan Ruddock, MP, has clearly stated that it is a totally unsuitable site.

Name P. Akeroyd Postcode SK13 7UH.

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National guidance recommends integrating new traveller sites into new developments.

Levensham is aware with such developments → try the Cutford / Old Day train options, for instance.

The only thing preventing this is a lack of vision, + political courage. Levensham Borough ~~is~~ seems to be living under a planning curse!

Name D. P. V. M. M. M. Postcode SE13

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Access issues

Safety " - traffic congestion/access

Community integration

Impact on conservation area - access through it,

Site adjoining it

width of caravans

length of consultation period

Other sites not considered

Name _____ Postcode SE13

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G

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(Please use as many pages as you need.)

The Catford Stadium Site
is much better for travellers
- better access
- possibility of business on site

The Council should put pressure
on the owners to include a travellers
site as their commitment to social
housing. If it takes a bit longer
that's OK if it is a better site.

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(Please use as many pages as you need.)

I LIVE ON FRANCEMARY RD & I WOULD LIKE TO REGISTER THE POINT THAT IT'S NOT JUST THE RESIDENTS FROM CHURCH GROVE WHO ARE CONCERNED ABOUT THE WAY LEWISHAM COUNCIL ARE TREATING THEM. IT'S MEMBERS OF THE WIDER COMMUNITY. I HAVE ONLY BEEN INFORMED OF PROCEEDINGS BY THE CAMPAIGN LED BY CHURCH GROVE. LEWISHAM COUNCIL HAVE MADE NO EFFORT TO INFORM RESIDENTS OR BUSINESSES PAST LADYWELL STATION TOWARDS BROCKLEY.

Name HELEN PERKINS Postcode SE4

(We are asking you to provide your postcode as we are looking to understand in which part of the borough participants in this consultation live.)

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(Please use as many pages as you need.)

No Houses in Church Grove are ~~costly~~^{private} homes, most have still mortgages and should not have their homes invaded with a travellers site
conservation area? what will you call it with a travellers patch?
I hope never to see that day coming!

Name V. PARKER Postcode 7 Church Grove

(We are asking you to provide your postcode as we are looking to understand in which part of the borough participants in this consultation live.)

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(Please use as many pages as you need.)

All points raised in this morning's meeting.

Agree on everything and want answers.

All alternative sites should be considered.

Name Margaret A Fisher Postcode SE13 7U4

(We are asking you to provide your postcode as we are looking to understand in which part of the borough participants in this consultation live.)

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(Please use as many pages as you need.)

WHY WOULD YOU HOUSE ANY HUMAN BEING ON CONTAMINATED LAND.

WHY ON A FLOOD PLANE

WHY DID THIS NOT COME UP IN ANY SEARCHES.

NO ACCSES FOR FIRE SERVICES.

HOW DO GET A 2.55 METRE TRAILER AND TRUCK THROUGH A 2.6 METRE GAP.

NEXT TO A CONSERVATION AREA ARE YOU SURE?

Name Mark Perkins Postcode SE4

(We are asking you to provide your postcode as we are looking to understand in which part of the borough participants in this consultation live.)

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(Please use as many pages as you need.)

Why have you not reassessed all the sites originally recommended by the ex' consultancy employed?

Name

Williams

Postcode

SE13 7UH

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12

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- ① Why were non-traveller residents of Ladywell & Lewsham not consulted, at same time as traveller community?
- ② Why do you ignore the fact ~~that~~ ^{any} that caravans are 2.55m, and Church Grove does not have adequate access? → they would have to use pavement.
- ③ Why was there no provisions made for emergency access?
- ④ Why didn't you provide the consultation as we requested, as a formal meeting, rather than drop-ins?
- ⑤ Why wasn't the wider Ladywell community made aware?

Name Muki Kulkarni Postcode SE137AU

(We are asking you to provide your postcode as we are looking to understand in which part of the borough participants in this consultation live.)

13

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(Please use as many pages as you need.)

How can you justify using 3425 sq mtrs on 5 families of travellers which could provide 30/40 more residential homes for people with families on Lewisham's long waiting list?

Name Williams Postcode SE13 7UU

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This site is unsuitable - due to access, health and safety and planning rules.

- ① Access to Church Grove is too narrow - ~~2.55~~ m traveller's caravans can be 2.55 m wide with 3 tonne towing vehicle. Access often blocked by parked cars.
- ② Health and safety - Fire engines have been unable to access Church Grove (photographic evidence) - This could also apply to Ambulances. - Flood plain, contaminated site.
- ③ Planning rules - Lewisham Council policy states - "Any development adjacent to Conservation area should be in keeping with area" - Caravan's are not in keeping with Victorian Houses

Joan Ruddock MP opposes this site - She says the other sites on the shortlist should be revisited. - A Traveller's site should be incorporated into a new development - Cathrod Dog Track is a much better site. good access - more pitches, etc.

Name T. p. Bromme Postcode SE13 7UU

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① ~~We~~ I recently moved in to Ladywell Road → why was this not disclosed by Lewisham Council as part of the 'Searches' when we purchased the property. Our car garage is off Church Grove.

② How do you justify moving a 2.5m+ caravan through such a narrow road?

③ How do you communicate to residents when you need to move the cars, and ~~to~~ organize this ~~process~~ with residents, travellers & council workers.

④ I agree with ~~the~~ all the points from the residents at the consultation ~~and~~ the 12/11/12 and look forward to answers.

Name DAVID FERNANDES Postcode SE15 7UT

(We are asking you to provide your postcode as we are looking to understand in which part of the borough participants in this consultation live.)

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(Please use as many pages as you need.)

I've fed up of being lied to and misled. Now the Council has written a misleading document full of untruths and circulated it to Ladywell (the consultation doc letter dated 4/9/11) This must be withdrawn and a new letter sent out telling the truth.

C. BRYNLEY-JONES

Name C. Brynley Jones Postcode SE13 7UU

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(Please use as many pages as you need.)

The road is far too narrow
No 11 + 13 have no privacy.
It imposes on every-one in the street
My husband and I are living in C.G.
for 40 yrs., and do not wish to have
a traveller site put here.

Name _____ Postcode _____

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(Please use as many pages as you need.)

Important to consider ;

- width of road
- access from Ladywell Rd.
- impact on residents in street.
- parking issues for local residents
- effect on house prices for local residents - many not be able to move home - impact greater as road is used for access to site
- in conflict with conservation planning requirements

Name P. Adury A. Postcode SE13 7U11

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18/11/2011

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How would travellers insure their homes?

Whether they rent or take a loan to buy they will need insurance. Currently it is not possible to get new buildings insurance for any property in Church Grove due to flood risk. It is therefore likely that no insurer would cover mobile homes or caravans on the site.

Name C. Cusitt Postcode SE13 7W

(We are asking you to provide your postcode as we are looking to understand in which part of the borough participants in this consultation live.)

4

18/11/2011

- Acoustic survey taking account of plant fr. Council depot / trains and planes
- Changes in land levels to deal with flooding
- Consultation with site owner of former glue factory and Mercy Terrace
-

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1. The travellers should not be hidden away in a tiny street; they should be given space in the Lewisham Gateway Project.

The Church Grove site does not allow 2 access points which would make the site safer & prevent too much use of Church Grove. A site in the L.G.P. could meet the guidelines

2. Cracks have appeared in our houses since the demolition. The houses have no foundations & are vulnerable to disturbance - further work will cause more problems.

3. The road is too narrow. A touring caravan is

Name GLORIA STEENSONNE Postcode SE13 7UU

(We are asking you to provide your postcode as we are looking to understand in which part of the borough participants in this consultation live.)

huge 12 ms long. Even large goods vehicles & the dustcart have problems negotiating use of the road plus turning into the main road at the end which can cause traffic problems & accidents.

4. We already have parking problems. The ~~parking~~ Ladywell is crowded because we are near the station. The idea of removing our parking places in order to instill the travellers would be unfair, would cause resentment & would make the surrounding roads even more crowded.

5. We gather that the travellers will have their own parking places for touring caravans & cars. There seems to have been little thought given to good community relations between the two communities.

It is also very likely that the road will be over used with extra goods vehicles & the travellers' visitors; who may very well travel in caravans.

6

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Again we come back to access. The road is too narrow. Our parking bays have been narrowed so larger cars can not park there. (Is this away of saying we have the space!!!). The impact to our settled community is obvious, pointed out time + time again. Hadymell balls site as a suggestion would be better as access could be made to suit the travellers. The vehicles. Stop trying to put a square peg into a round hole.

Name S. Taylor. Postcode SE13 7UU

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The impact on the small community of families in Church Grove is higher than if the site ~~were~~ ~~was~~ ~~access~~ elsewhere, where access was not so much of an issue - e.g. a new-build site where new housing was combined with a new-build site for travellers where access could be carefully designed.

Hope this makes sense

Name P. A. Cherry Postcode SE13 7U4

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Difficulty / impossibility of obtaining conventional insurance in a flood zone.

The council may think this is not a problem — insurers think otherwise (residents are unable to change insurers...)

Name D. Hoskins Postcode ST15 2U

(We are asking you to provide your postcode as we are looking to understand in which part of the borough participants in this consultation live.)

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I support the Council in providing a site for Travellers in the Borough of Lewisham.

I do not consider that the Church Grove/Watergate School site is appropriate for a site. Access for trailers and fire engines is inadequate. It is a conservation area too. I consider that there are more appropriate sites elsewhere in the Borough. For example the old dog-trade site in Catford.

Name Peter Cartwright Postcode SE23 2AR

(We are asking you to provide your postcode as we are looking to understand in which part of the borough participants in this consultation live.)

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(Please use as many pages as you need.)

This site is unsuitable as a traveller's site because

- 1) Access - road width 2.6 m. Traveller's Caravans can be 2.55m - Pulled by 3 tonne vehicle - Access from Ladywell Road - far too tight - ~~The~~ Caravans will have to swing onto opposite carriage way.
- 2) Site contaminated - Next to river - ~~Access~~ development
- 3) Next to Conservation area - Any ~~site~~ should be in keeping.
- 4) Planning permission granted without considering all these points properly.

The report recommending Church Grove to Mayor and Cabinet - Very poor. - Church Grove ~~coming~~ coming top with 20 points ridiculous. - Needs assessment a joke. 11 ~~responses~~ responses from 490 - means nothing - demonstrates - no need.

Name J. Brome Postcode SE13 7UU

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24-11-2011

(1)

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- One point of access and exit for large vehicles towing caravans. In the (unlikely) event of two such vehicles meeting head on there is risk to parked vehicles and pedestrians in Church Grove and Ladywell Road.
 - Narrowness of road/available space for moving vehicles
 - Very narrow pavement on this side of the road.
 - Access for emergency vehicles when co-ordination of more than one service is required. Caravan dwellers are at increased risk due to upholstery materials which do not meet UK criteria for fire ~~risk~~ hazard.
 - A travellers site does not enhance any conservation area.
- Name Jan Cook Postcode SE13 7UU.

(We are asking you to provide your postcode as we are looking to understand in which part of the borough participants in this consultation live.)

24-11-2011

(2)

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Overall I would consider myself fairly neutral about the proposal.

However I am concerned about the access issues into the site and feel that if it proceeds that ^{should} there be strict restrictions on the size of vehicles that the Travellers are allowed to have on the site e.g. nothing larger than a standard 'transit' van. Obviously the ^{'state'} caravans would be bigger but my understanding is these don't move that often so that is less of an issue.

I am not convinced that this is the best site available and think further consideration should be given to using the Ex Deptford Green school site in Deptford which will soon be available. It is not as constrained as this site and may work better in the long term.

Name TIM COLLINGRIDGE Postcode SE13 7DQ

(We are asking you to provide your postcode as we are looking to understand in which part of the borough participants in this consultation live.)

24-11-2011

3

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(Please use as many pages as you need.)

This site is unsuitable and always has been unsuitable. There is no evidence of need for this site to be pushed through in a hurry. The needs basis presented in the report to Mayor and Cabinet was very poor and eleven responses from four hundred and ninety does not demonstrate a need.

The site is unsuitable ~~for many~~ as it contravenes Government Guidelines on many planning issues, which if ignored pose real Health and Safety issues and good community relations. The following are some of the guidelines ignored

- 1) Width of Access - not wide enough for caravans 2.55m wide.
- 2) Access from Ladywell Road with Van/car and trailer.
- 3) Contamination of land / Flood Plain
- 4) Ignoring proximity to Conservation Area
- 5) Noise - Railway / Council depot.
- 6) Lack of 2 access points to site.

The report presented to Mayor and Cabinet did not mention any of these planning considerations - once again a very poor report.

Name J. Broome Postcode SE13 7UU

(We are asking you to provide your postcode as we are looking to understand in which part of the borough participants in this consultation live.)

P.T.O.

There needs to be a fair and proper return to the seven sites on the shortlist. - Church Grove is unsuitable for all the aforementioned reasons.

The old site at the Catford Dog Track is much more suitable with no access issues etc. The Traveller site could also be included in a new development - The preferred option according to Government Guidelines - to allow for better community integration. - Also the site is much larger if more pitches are required.

24-11-2011

(4)

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The shortlisting process was a parody. It looks like council officials started with Church Grove as the preferred site, then made the ^{criteria} ~~other~~ elements of the search fit the pre-determined result.

Very poor. 1/10.

Have another go.

Name P. Hutton Postcode SE13

(We are asking you to provide your postcode as we are looking to understand in which part of the borough participants in this consultation live.)

24-11-2011

5

The Council is consulting on the former Watergate school site in Church Grove as the preferred location for a site for Gypsy and Traveller families.

The Council would like to hear the views of residents and other interested parties on this proposal. In particular, we would like to know if there are any factors which you feel we may have overlooked in our consideration of the site which would make Church Grove unsuitable as a site for Gypsy and Traveller families, or if there are reasons why another site in the borough is in fact more suitable.

(Please use as many pages as you need.)

Where explicitly has the pressure (or need) for 5 family pitches for Travellers come from? Still no justification for a site this size being used for 5 families when it could easily house 30 families.

Why has not part of Calford Dog Track been assessed. There is excellent access, no residential homes in the immediate area, and adequate time to have the site up and running and well screened before any future development.

How can we be convinced that Watergate will not be "fit for purpose" in 5/6 years time? The narrowest of Church Grove has still not been addressed.

Name R. Williams Postcode SE 13 7UU

(We are asking you to provide your postcode as we are looking to understand in which part of the borough participants in this consultation live.)

30/11/2011

1

The Council is consulting on the former Watergate school site in Church Grove as the preferred location for a site for Gypsy and Traveller families.

The Council would like to hear the views of residents and other interested parties on this proposal. In particular, we would like to know if there are any factors which you feel we may have overlooked in our consideration of the site which would make Church Grove unsuitable as a site for Gypsy and Traveller families, or if there are reasons why another site in the borough is in fact more suitable.

(Please use as many pages as you need.)

Points from 2005 DCLG Guidance

4.23 There must be a clear gap of 3mtrs within the site perimeter boundary as a fire precaution.

There is a 1 mtr gap? on the existing plans.

4.26 Vehicular access, must be at least 3.1mtrs.

At the moment it is 2.8mtr between parking bay/car and the opposite pavement.

4.27 Road Access Road must be at least a minimum of 3.7mtrs - What does this mean i.e with or without cars

6.8 Pitches must be no more than 30mtrs from a fire hydrate. There is no hydrate on the plan shown at the moment.

3.1 T&G sites should be developed near to/within housing for mainstream settled community as a part of mainstream residential development.

Catford Dog Track would fit this criteria perfectly. It is clear & ready. The site could be up & running before any

Name R. Williams Postcode SE13 7UH

P. To -

(We are asking you to provide your postcode as we are looking to understand in which part of the borough participants in this consultation live.)

development (and well ~~screened~~ screened). ~~It is no~~
There are two railway lines between it and any residential
housing.

Why not wait until the new DCLG document and
localism bill comes out this year. (the consultation for this
finished in July 2011.)

Public Meeting

06-12-2011

(1)

The Council is consulting on the former Watergate school site in Church Grove as the preferred location for a site for Gypsy and Traveller families.

The Council would like to hear the views of residents and other interested parties on this proposal. In particular, we would like to know if there are any factors which you feel we may have overlooked in our consideration of the site which would make Church Grove unsuitable as a site for Gypsy and Traveller families, or if there are reasons why another site in the borough is in fact more suitable.

(Please use as many pages as you need.)

The site search and selection dates from 2006 and has only been poorly updated (and by people who have an interest in the outcome). There should have been a fresh external site search using the new criteria. Both criteria and need have changed very significantly since 2006.

Name _____ Postcode _____

(We are asking you to provide your postcode as we are looking to understand in which part of the borough participants in this consultation live.)

TRAVELLERS SITE CONSULTATION

PUBLIC MEETING

Date: 6 December 2011

Time: 19:30pm – 9:00pm

CHAIR: Cllr Stella Jeffrey (SJ)

Response Panel:

Councillor Damien Egan

Aileen Buckton – Executive Director of Community Services

Steve Gough (SG) – Director of Regeneration and Asset Management

KEY

Resident (Res)

SJ made the following points at the start of the meeting;

- Consultation for use of the site for travellers will continue up to 18 December 2011.
- All viewpoints will be put into a report and submitted to mayor and cabinet.
- 5mins per question will be allowed.
- SG who is the Director of Regeneration and Asset Management will be assisted in answering questions by AB the Executive Director for Community Services.

SG - Provided a background and rationale for the consultation process and set out the ways in stakeholders could engage in the process which begun on 7th November and would run till 18th December. He noted that stakeholders' views are being sought through a variety of means including and online survey, direct emails, comment sheets, free-post etc.

He indicated that from the written responses received so far the main concerns raised include: Access, Suitability (flood, fire, contamination) and Size and Need.

Res (Mr Raper) asked to speak on behalf of the residents of Church Grove and proceeded to make the following points, that:

- The proposal for the site was first proposed 5 years ago but plans were shelved and they made to believe that planning approval had lapsed. They had also received various assurances that the site would not be developed for such use and residents were offered

opportunity to design a community garden but this is no longer possible.

- Access is a key issue at the site given the narrowness of the road in relation to the proposed use. He noted that implementing the proposal would require the suspension of parking and possibly the craning out of parked cars in order to provide access for caravans.
- Travellers moving static caravans into the proposed site would create major parking issues for residents.
- Moving a touring caravan onto the site would require the driver to mount the pavement, when turning into Church Grove increasing the risk to people as they use the pavement. To illustrate this point, residents presented visual illustration to argue that the width of Church Grove is 2.6m wide and the width of a frequently used caravan is 2.55m wide, excluding wing mirrors on either side. The wing mirrors increase the width to over 3m.
- The consultation letter sent out at the start of the process only noted the width of the smaller caravans and didn't consider wider caravans. There is therefore the need for the Council to carry out a thorough research into various available caravans that Gypsies and Travellers are known to use widely in the UK.
- Mr Raper also raised the issue of need. He noted that the Independent Needs Assessment carried out by the Council identified up to 100 Gypsy and Traveller families living in the borough and concluded that there was a need for between four to nine pitches. Mr Raper however, queried the validity of the needs assessment given number of families (11 out of 100) who were engaged during that exercise. He noted that the proposed site will not cater for the accommodation needs of the Gypsy and Traveller community and advocated for the need for a bigger site to be found.
- On the point of access, Mr Raper asked that an alternative access route through Wearside Road be found. This may involve the building of a bridge over the Ravensbourne River for access to the site.

SG In response to the above queries, SG stated that:

- The Council takes the issue of access very seriously and as part of the consultation has commissioned a transport assessment to review the issue and any change in policy since planning permission was granted for the site. The outcome of the assessment will be reported to the Mayor at the same time as the outcome of the consultation.
- He noted that access was dealt with as part of the planning permission in 2008 and included such measures as suspending parking while static caravans are brought to the site. This may

involve, in some cases moving of parked cars in order to access the site. This will be similar to situations when yellow lines are painted by the Council's highways section.

- He noted further that the Council will not pursue the point of alternative access to the site due to the very high cost of pursuing such an option.
- On the issue of need, he noted that the independent Needs Assessment report considered by the Mayor on 5th October acknowledged the difficulty in determining the exact level of need due to the unique circumstances of Gypsies and Travellers in the borough but recommended the provision of between 4 – 9 pitches to meet current need with future need to be examined on an ongoing basis.

This was followed by a series of questions from the residents/stakeholders and responses provided by the panel. The questions are labelled 'Q' and the responses 'R'.

1. Q: Will the Council correct the misinformation sent out in the consultation letter to residents (regarding widths)?

R: An independent transport assessment is currently being carried out. The results will be presented to the Mayor, alongside the consultation report, in January 2012. Further, the Council has been updating the frequently asked questions page on its website throughout the consultation.

2. Q: Will the Council guarantee to the gypsy and traveller community more sites?

R: The needs assessment identified a need for 4-9 sites. Once we have delivered 5 sites we will review future need and possibly a further site, in addition to the proposed site. We currently do not know if further sites will be identified as we are unaware of the need for anymore beyond the findings of the original needs assessment. The Council is obligated to regularly review the need and therefore further sites could be identified in the future, if a need is identified.

3. Q: How will the Council enforce a parking suspension (which would be required to move static caravans into the proposed site)?

R: The Council has experience of managing parking suspensions when carrying out line markings and road re-surfacing. It would be enforced in much the same way.

4. Q: What are the residents being consulted on?

R: The previous consultation was based on re-providing residents from the former gypsy and traveller site on Thurston Road. However the

families have subsequently moved on. Therefore a further consultation was required as part of the new site search.

5.Q: A resident commented that they have spoken to a caravan company who specialise in moving static caravans onto sites. They looked at Church Grove on Google maps. They stated that static caravans are roughly 35ft in length and would be delivered in two parts. They confirmed they would not be able to deliver a caravan of that size onto the proposed site because they would have to park the caravan on Ladywell Road and push the caravan up Church Grove by hand. They also had doubts whether a caravan could turn into the site without hitting the houses on either side of Church Grove.

R: The independent transport report will look at all issues relating to access at the site and will look into this concern.

6. Q The panel was asked about the brief for the independent transport assessment and the sizes of caravans the assessment the consultant was asked to review.

R. The consultant was asked to look at caravans mostly used in the UK. Therefore they are looking at the broad range of caravans and their use. The report will be of a comprehensive nature which look to address all the concerns being raised.

7. Q Officers were asked if it was the same consultant engaged during the planning application process in 2008 who has been engaged to carry out the current transport assessment.

R Officers responded that a new consultant, Project Centre, a highway engineering and transport planning firm has been commissioned by the Council to carry produce a technical report on access at the site.

8. Q: When will the transport report be available?

R. The report will be presented to the Mayor alongside the report on the consultation on 18th January 2012.

9.Q: Has there been any been consideration given to alternative uses of the site as there is increasing demand for housing for the elderly in the borough.

R: The Council has many competing obligations. There is a need to have a travellers' site as much as there is a need to address the housing needs of the elderly in borough. Lewisham has a highly dense population, which makes it difficult to identify possible sites to meet every need. The Council continually assesses these needs in order to make adequate provision for all.

10.Q: The needs assessment states that there are between 70 – 100 Gypsy and Traveller families living in the borough. There is no formal waiting list for pitches in the borough. How is this need justified and how does the Council plan to allocate the 5 pitches between 100 families.

R: The needs assessment established that there is a need for between 4 and 9 pitches. There is currently no allocation policy as there has been no site to offer for a number of years. A new allocations policy will be developed similar the current housing allocations policy. This will put in place a criteria put in place to decide who will be allocated a site.

11.Q: Residents of Church Grove wanted to know if they could see the independent assessment before it goes to the Mayor.

R: In circumstances such as this the Council has allowed community groups to comment on consultations by submitting a letter outlining their perspective, which would be attached as an appendix to the main report. In the same way the residents group could have the opportunity to view the independent report before the Mayor & Cabinet meeting and submit their comments, which would be appended to the consultation report. The independent report will also be appended to the consultation report. Members of the public can also register their comments in advance of the meeting, and present their comments to the Mayor, at Mayor & Cabinet, before the he makes his decision.

12.Q: A resident commented that they didn't feel their queries were being addressed through the process.

R: Cllr Egan responded that it was the responsibility of elected members to scrutinise the information presented by officers and raise questions on behalf of their constituents. The report will be made available to the residents and the Mayor will be made aware of their views. It is the officers' role to present the information in a logical manner and it is the Councillors' role to scrutinise the information presented and make decisions on behalf of their elected members.

13. Q: Residents called for the consultation period to be extended and or re-run in light of the issues raised.

R: It is the Council's view that a six-week consultation period was adequate to allow stakeholders to comment and for comprehensive responses to be collated in order for the Mayor to reach a decision.

Cllr Jeffery thanked the attendees and brought the meeting to a close at 9:00pm.

Kim Horwood
9 Church Grove
London SE13 7UU

15th December 2011

CHURCH GROVE TRAVELLERS' SITE CONSULTATION

Please note: the Council will be receiving reports by Boyer Planning and Sanderson Associates, commissioned by the residents, and submitted on our behalf. I make references to these in my comments below.

In addition, we have been receiving advice from Irwin Mitchell Solicitors, whose early advice is that the planning permission is no longer appropriate, also that the consultation process is seriously flawed and should be at the least re-started.

My comments are as below.

1. The previously granted planning permission is no longer appropriate

Irwin Mitchell's advice to us is that the Council has only limited scope for revisiting the previously granted planning permission, i.e. it has a duty to reconsider the desirability of implementing it so long after it was granted when circumstances and knowledge have changed.

The previous planning permission was granted for known traveller families, living at the Thurston Road site, who had to be re-housed due to the fact the Council's plans for regenerating Lewisham involved demolishing their current site. During the consultation and planning processes, the Council constantly assured Church Grove residents that these particular families had needs which were less onerous than travellers in general, e.g. that they did not travel; their caravans were small; there were no men (i.e. no commercial vehicles entering and leaving the site on a regular basis – although in fact this wasn't true); that Church Grove was better suited than the Council's consultants' first choice - the lorry park in Catford – because these travellers wanted to be closer to their current amenities. But those traveller families gave up their traveller licences and therefore the need disappeared.

For this current proposal, the Council has no idea which travellers will be living on the site. Therefore, all their previous arguments against access etc problems – which Church Grove residents didn't accept in any case – clearly now count against Church Grove being a suitable site. Yet there is no evidence in the Council's reasoning for Church Grove to be again the preferred site that this has been taken into account. The key issue of access – which the

Council has subsequently admitted, and the Mayor agreed, is a major problem – 'answered' simply by saying that the previous planning permission (dealt with it).

2. The Council has broken its promises to Church Grove residents

After the Thurston Road travellers sold up their rights, Steve Gough informed residents that the then existing plan for Church Grove was no longer required; that planning would be allowed to lapse; and that any further plans for traveller sites in Lewisham would have to be assessed under new criteria for a new planning permission. He also promised to inform us if this changed.

He broke this promise by not even telling residents that the plan was being re-proposed to the Mayor: we only found out because a reporter told us two days before the Mayor's meeting to agree the proposal. Once again, and despite the lessons of the previous process, the Council is in breach of government guidance (DCLG) to consult both the traveller and settled community *early*. Despite knowing how stressed residents were last time, on only hearing of the Council's plans when a letter dropped through our doors telling us the consultation was on, it planned to do exactly the same thing again.

Also, the Council's current consultation letter states that it still has permission for the *old* plan. How can the Council claim – as it appears to be doing – that one planning permission is good for both plans? This is clearly absurd. In other words, the Council is claiming it has planning permission for a site based on now defunct needs. This clearly means the plan is defunct. In short, the Council allowed planning permission to lapse because it no longer required Church Grove for the previous purpose it said existed. It's asking residents to believe it then instigated a new search for sites based on new criteria and that it's nothing more than coincidence that the final figure of required sites – 5 – is exactly the same for both needs assessments!

Further support for our belief the Council no longer wanted Church Grove for a travellers' site was supplied in this email:

Fri 13th February 2009

Email from Heidi Alexander (then Deputy Mayor, now MP for Lewisham East)

Dear Simon

I am sorry not to reply to your email sooner. I had a meeting with some of your neighbours this morning so it may be that an update has already reached you but if not, the summary is as follows:

Towards the end of last year the travellers living on Thurston Rd expressed concerns about moving to a new site on Church Grove and asked the Council if it would consider terms for the surrender of their licences. The travellers, with legal representation, agreed terms and vacated Thurston Rd at the beginning of this month. The Council is now undertaking a site search for an alternative single site of a minimum of 9 pitches and the results will be reported to the Mayor when it is completed.

Whilst I can't guarantee that a site won't be built at Church Grove (as it will be considered as part of the site search), the need to relocate the long-term residents of Thurston Road due to the town centre redevelopment plans no longer exists and as such some of the factors that affected the selection of Church Grove as the council's preferred site are no longer relevant (i.e. the need to keep the site in the vicinity of Lewisham town centre and the need for a site that could be delivered quickly). London-wide research has also been conducted which suggests that Lewisham requires a minimum of 9 traveller pitches (as detailed above) and this number of pitches would not fit onto the Church Grove site.

I am sorry I can't provide any more definitive news at the moment.

However, at the meeting this morning we did agree that the council would keep resident representatives updated as the site search progresses.

Yours sincerely

Cllr Heidi Alexander

Deputy Mayor and Cabinet Member for Regeneration

This clearly shows that the Council thought Church Grove was no longer suitable for a site because the original traveller requirements had changed and because they now needed a site for 9 pitches. It also acknowledges that some of the factors that made Church Grove the preferred site before no longer existed – yet the Council is still claiming that Church Grove is the first preferred site! Previously, as already stated, the lorry park in Catford was actually scored first, which raises the obvious question of how it's possible for it not to be first again especially in light of Church Grove's now reduced special considerations.

3. Planning permission showing as 'withdrawn' from the Council's planning website, re-entered some months later as 'granted'

We believe this may be illegal, and certainly at least raises residents' and other stakeholders' legitimate expectations that the site was not going to be used as a Travellers' site. We know of two residents close to Church Grove who bought properties recently on the basis that their searches showed this permission had been 'withdrawn'. Clearly, this is the very opposite of early consultation.

4. Consultation process flawed, mismanaged and deceptive

The consultation letter refers, again, to traveller caravans being only 2.2m wide. When the Mayor visited Church Grove recently, Steve Gough publicly apologised to the residents for getting this fact wrong – he accepted, in front of the Mayor, that Traveller caravans can be up to 2.55m wide with another 0.5m required for extended wing mirrors, and promised that he would instruct his officers to stop informing people at drop-ins wrongly. Clearly, therefore, the consultation is flawed: stakeholders have not been told the full extent of the key problem. The consultation letter has not been reissued or even amended, and the Council's website has simply removed the relevant section, i.e. so there is now no mention of access at all.

The consultation letter states that as residents' questions are raised they will be put on the Council website. However, at three days before the consultation closes there are no questions on the website, despite dozens having been raised in writing and at drop-ins/meetings. Also, at the first drop-in session, Steve Gough promised to answer residents' questions during the process: to date, he has answered none of them. This is gross misconduct on the part of the Council and Mr Gough in particular.

At the request of the Mayor, Steve Gough has commissioned an independent report into road issues around Church Grove. When asked at the last public meeting why he has not re-started the consultation or at the very least amended it, he said he was waiting for the results of the

report. Apart from the fact he had had the report for several days at the time of this meeting, this was a clear lie: he had already admitted the consultation letter was wrong. We now have a situation where it looks as if the *key* information residents need to respond to this consultation will not be made available until *after* the consultation has ended. This is in breach of government guidelines on good consultation practice. At the time of writing, the residents have requested several times in writing that Steve Gough impart the content of this report but he has not even answered them. Residents will be putting in a formal complaint about Mr Gough's behaviour in this matter.

5. Traveller consultation

As said, government guidance recommends early consultation with both communities. Yet it appears as if the Council has not been able to even find any travellers to consult with about this site, other than two ladies who were kind enough to meet some residents just over a week ago. Those ladies did not express any desire to come to Church Grove. Therefore, the Council has failed to consult its intended population of travellers for this site. Given the Church Grove residents have shown ample reasons why this site is not suitable, where is the Council's evidence that the Travellers' community believes otherwise?

6. No Justification/Need

Simon Raper, a resident and statistician, has shown in writing to the Council how the Needs Assessment made by Local Dialogue is seriously faulted. The Boyer report says the same. Common sense alone shows that nothing solid can be deduced from only 11 returns out of an estimated Traveller population of nearly 500. In any case, there was very little need (as opposed to wish) shown in even those eleven returns.

I believe the Council may also be guilty of misconduct in this respect. At one of the drop-ins, I pointed out to Kplom Lotsu (Steve Gough's assistant) the lack of evidence in the assessment for need. He assured me that, since the assessment was concluded, the Council has been working hard to find more travellers who want to come to Church Grove. In other words, the Council is trying to stretch what is now a closed assessment – and which the decision to consult on Church Grove was based on – by actively seeking out and persuading Travellers that they should live there! This seems at least absurd, given the huge shortage of housing in Lewisham required by people with a legitimate need. It also smacks of maladministration.

7. Access

The Council is well aware of the issue that Church Grove is too narrow to take regular traveller traffic. I refer you to the reports by Boyer Planning and Anderson Associates which fully support the residents' research to show that, for example, traveller caravans are frequently too wide for the available access, e.g. 3.05m (2.55m plus legally required extended wing mirrors at 0.5m) needing to traverse a 2.6m road space (as measured by the Council).

Even if a lorry plus caravan traverses the narrow pavement on the non-parking side (0.9m), it will be in grave danger of causing damage to parked cars, fences/hedges, and indeed to residents who step on to the pavement unsighted.

The Council has used the argument that its refuse lorry accesses the street and that is 2.5m wide. We have pointed out to the Council, however, that in fact the lorry rarely comes down the street, but stops close to the Ladywell Road end. On rare occasions when it has come further, it has had to drive along the pavement. The point being that it is much easier to control a fixed base vehicle performing such a manoeuvre than it is to control a lorry pulling a large caravan.

The argument the Council used in the first round of planning was that the Thurston Road travellers only had small caravans and "didn't travel", i.e. it's not much of a problem. We dispute even this argument, on the grounds that the Council should not be building a travellers' site that curtails their natural right to travel. Also that in any case there is photographic evidence that the Thurston Road site was host to lorries, i.e. that there would have been daily in/out movement of lorries along Church Grove even under the old scheme.

The Sanderson report, however, points out that there is likely to be far greater movement of heavy traffic to and from the Church Grove site, to quote:

"Evidence accepted by consultant's representing Travellers at a recent public inquiry, Inspectorate reference APP/M2325/C/10/2134060-74 and APP/M2325/A/2134042 was that from figures drawn from the TRICS database system (the industry standard for assessment) a level of 10 trips per pitch was to be expected in a 24 hour period. This level of use is higher than that of a normal dwelling which is in the order of 8 trips and lower, per house per day. As such the 5 proposed pitches would generate 50 vehicle movements per day, all of which traffic would be new to Church Grove."

In other words, the volume of heavy traffic along Church Grove is going to be far higher than the Council has allowed for. This will greatly exacerbate tension between the two communities, which of course works directly against government (DCLG) guidance that Local Authorities must ensure the needs of both communities are catered for.

Where static caravans/mobile homes are concerned, the Council agrees that these at least will only be able to transfer down Church Grove if the residents' cars are removed. What the Council does not appear to have considered, however, is how exactly these homes will reach the site. We've spoken to a firm which specialises in moving travellers' static caravans and after looking at the street on Google Maps they didn't believe a flat-bed lorry (required for transporting sections that can be 45ft in length) would have enough space to turn into the street or into the site. Therefore, it would be necessary to park the lorry in Ladywell Road, thereby blocking one lane of a very busy road; then unload the static caravan section, which would then block the other lane too. Then it would be necessary to push the section by hand along Church Grove.

We have pointed out to the Council that anyone with a zone B parking pass can (and does) park in Church Grove. Therefore, it's extremely unlikely that the Council will be able to contact the owner of every car, each time a static caravan or mobile home is moving into or out of the site. The Council's own needs assessment states that Lewisham travellers have a high degree of mobility. In other words, families will be moving in and out of the site perhaps up to 5 times a year, which equates to 10 movements of their buildings, each movement requiring two lorry loads. Even if travellers inform the Council each time they want to move, timings can change at the last minute. Also, the Council will have to arrange in advance for residents' to move their cars. Apart from car owners who are not contactable, the Council is being naïve to say the least if it believes every Church Grove resident is going to willingly comply with this regularly-occurring inconvenience.

Astonishingly, at the last public meeting Steve Gough, when this point was put to him, admitted 1) that the Council would have to use a crane to lift some cars off the road, and b) that this is an illegal act! Apart from the fact that such cars would in actuality have to be lifted out of the street - since being placed on the pavement will still not provide sufficient access for a mobile home – the Council cannot possibly suggest a solution to a problem with its plan that requires it to break the law!

This issue in particular has proved to residents that the Council cares nothing for residents' well-being and is only interested in fulfilling what it sees to be the cheapest and most convenient solution to a piece of land it has spare. Every single person who's seen the street – from Joan Ruddock to guests to the residents' website (www.savechurchgrove.com) - has expressed the common sense view, usually accompanied by a mixture of horror and amusement, that this is a totally unsuitable road to provide access to a travellers' site.

We are in the absurd situation where for four years, neither Mr Gough, nor any Council official, nor various councillors, has been apparently able to pick up a telephone and contact a caravan authority (details of which have been supplied by the residents to the Council on numerous occasions) or spend 15mins on the internet to discover that traveller touring caravans are frequently 2.44-2.55m wide and not only the 2.2m that the Council believes (although Mr Gough has since admitted he got this wrong).

The situation has been exacerbated by a change in the law in 2010, regarding towing. Before, cars were allowed to pull caravans only up to 2.3m in width. Now, they can pull caravans up to 2.5m in width (as long as they're under 7m in length: longer caravans, preferred by travellers, still need to be pulled by lorries) – bringing the UK in line with the rest of the EU. In other words, there will clearly now and in future be an increase on UK roads of wider caravans, and therefore an increase in these bigger vehicles coming to and from Church Grove. This, incidentally, is one of many changes in situation/law that invalidates the Council re-visiting the planning permission.

8. Conservation

The original plan was in clear breach of the Council's own rules for a Conservation Area (which Church Grove is in), i.e. that any nearby developments should be in keeping with the area. Previously, the Council failed to explain how caravans and mobile homes can be in keeping with a conservation area. It promised to spend more than the usual amount of money on making the utility blocks blend in with the surroundings. This time, it has failed to answer whether or not extra funds are still available, i.e. if as is likely they are not, going ahead with the plan will be in even further breach of conservation rules.

9. ROI considerations

With the introduction of the Localism Act on 15 November 2011, the Council no longer has a statutory duty to provide traveller sites. By contrast, it does have a statutory duty to provide more sheltered accommodation, for which there is a great and growing need in Lewisham. The Council has been contacted by The Lewisham Almshouse Charity expressing an interest in the Church Grove site being used for sheltered housing. Given the problems of access and heavy rate of traffic which comes with a traveller site (see the Boyer and Sanderson reports), we believe this would be a much more appropriate and needed use of the site.

10. Bad weather dangers

One of the many considerations the Council has failed to make is the additional health and safety risks which will arrive with bad weather (see the residents' commissioned reports). Clearly, the access width on Church Grove is already severely limited; and given that a caravan is hard enough to control in ideal conditions, there is a strong likelihood of damage to cars, property and residents themselves from the frequent movement of lorries, along with caravans at times, to and from the site.

11. Nuisance of dogs/quad bikes

In its first set of plans, the Council stated that it would not install a gate across the entrance to the site. Travellers are well known for possessing more dogs than usual, and their children often have quad bikes. Without a gate, both dogs and bikes are likely to run along the street, potentially endangering residents, particularly the young children who may be crossing it.

12. Lack of good management

Councillor Egan took some Church Grove residents to see a well-managed site in Hackney. While the residents were impressed with what they saw (although access is not a problem there: travellers do not have to pass through residents' community space to get in and out), it highlighted another weakness in the Council's plans. The Hackney site is visited every day by an experienced manager, and the travellers living there agree that this is key to the success of the site. The site manager herself insisted this would need to be done at Church Grove too (she also said no site should go ahead here until the access problem is sorted out). Yet the Council has stated that it will not be spending money on this level of management at the Church Grove site.

13. Public and Press Support

Support for the residents' position – i.e. not against travellers but against the total unsuitability of the Council's plans – has been virtually unanimous. The online petition at our website has received (at the time of writing) 417 signatures – a very high number considering this is a tiny street of only 19 houses.

As mentioned above, Joan Ruddock has publicly expressed her view that Church Grove is totally unsuitable for a travellers' site.

I strongly suggest the Council studies our website, including the many public comments expressing shock, surprise and outrage at this proposal.

14. Conclusion

It seems incredible to us that our own Council – comprising elected representatives of the people – has over the past four years shown absolutely no interest in our legitimate concerns over this proposal(s).

It has shown commendable concern for travellers' needs; however, this has been out of all proportion both to the concern it has shown us and to the current situation where it cannot even find any travellers who want to live at this site.

The Council has also ignored key government advice on early and thorough consultation both of travellers' and residents' communities. It has launched a consultation without explaining what the consultation is *on*. In the consultation letter it provided false information on key elements; later admitted this was the case, promised to put it right but didn't; commissioned an independent transport report (an act in itself which should at least have stopped the consultation) which it subsequently refused to show residents before the consultation closes.



Kim Horwood

Terry Edge
9 Church Grove
London SE13 7UU

15th December 2011

CHURCH GROVE TRAVELLERS' SITE CONSULTATION

Please note: I enclose with this letter a copy of the transport report by Sanderson Associates, commissioned by the residents of Church Grove. Their comments are submitted on our behalf as part of this consultation.

The Council will also be receiving a report by Boyer Planning, also commissioned by the residents, and submitted on our behalf.

In addition, we have been receiving advice from Irwin Mitchell Solicitors, whose early advice is that the planning permission is no longer appropriate, also that the consultation process is seriously flawed and should be at the least re-started.

My comments are as below.

1. The previously granted planning permission is no longer appropriate

Irwin Mitchell's advice to us is that the Council has only limited scope for revisiting the previously granted planning permission, i.e. it has a duty to reconsider the desirability of implementing it so long after it was granted when circumstances and knowledge have changed.

The previous planning permission was granted for known traveller families, living at the Thurston Road site, who had to be re-housed due to the fact the Council's plans for regenerating Lewisham involved demolishing their current site. During the consultation and planning processes, the Council constantly assured Church Grove residents that these particular families had needs which were less onerous than travellers in general, e.g. that they did not travel; their caravans were small; there were no men (i.e. no commercial vehicles entering and leaving the site on a regular basis – although in fact this wasn't true); that Church Grove was better suited than the Council's consultants' first choice - the lorry park in Catford – because these travellers wanted to be closer to their current amenities. But those traveller families gave up their traveller licences and therefore the need disappeared.

For this current proposal, the Council has no idea which travellers will be living on the site. Therefore, all their previous arguments against access etc problems – which Church Grove residents didn't accept in any case – clearly now count against Church Grove being a suitable

site. Yet there is no evidence in the Council's reasoning for Church Grove to be again the preferred site that this has been taken into account. The key issue of access – which the Council has subsequently admitted, and the Mayor agreed, is a major problem – 'answered' simply by saying that the previous planning permission (dealt with it).

2. The Council has broken its promises to Church Grove residents

After the Thurston Road travellers sold up their rights, Steve Gough informed residents that the then existing plan for Church Grove was no longer required; that planning would be allowed to lapse; and that any further plans for traveller sites in Lewisham would have to be assessed under new criteria for a new planning permission. He also promised to inform us if this changed.

He broke this promise by not even telling residents that the plan was being re-proposed to the Mayor: we only found out because a reporter told us two days before the Mayor's meeting to agree the proposal. Once again, and despite the lessons of the previous process, the Council is in breach of government guidance (DCLG) to consult both the traveller and settled community *early*. Despite knowing how stressed residents were last time, on only hearing of the Council's plans when a letter dropped through our doors telling us the consultation was on, it planned to do exactly the same thing again.

Also, the Council's current consultation letter states that it still has permission for the *old* plan. How can the Council claim – as it appears to be doing – that one planning permission is good for both plans? This is clearly absurd. In other words, the Council is claiming it has planning permission for a site based on now defunct needs. This clearly means the plan is defunct. In short, the Council allowed planning permission to lapse because it no longer required Church Grove for the previous purpose it said existed. It's asking residents to believe it then instigated a new search for sites based on new criteria and that it's nothing more than coincidence that the final figure of required sites – 5 – is exactly the same for both needs assessments!

Further support for our belief the Council no longer wanted Church Grove for a travellers' site was supplied in this email:

Fri 13th February 2009

Email from Heidi Alexander (then Deputy Mayor, now MP for Lewisham East)

Dear Simon

I am sorry not to reply to your email sooner. I had a meeting with some of your neighbours this morning so it may be that an update has already

reached you but if not, the summary is as follows:

Towards the end of last year the travellers living on Thurston Rd expressed concerns about moving to a new site on Church Grove and asked the Council if it would consider terms for the surrender of their licences. The travellers, with legal representation, agreed terms and vacated Thurston Rd at the beginning of this month. The Council is now undertaking a site search for an alternative single site of a minimum of 9 pitches and the results will be reported to the Mayor when it is completed.

Whilst I can't guarantee that a site won't be built at Church Grove (as it will be considered as part of the site search), the need to relocate the long-term residents of Thurston Road due to the town centre redevelopment plans no longer exists and as such some of the factors that affected the selection of Church Grove as the council's preferred site are no longer relevant (i.e. the need to keep the site in the vicinity of Lewisham town centre and the need for a site that could be delivered quickly). London-wide research has also been conducted which suggests that Lewisham requires a minimum of 9 traveller pitches (as detailed above) and this number of pitches would not fit onto the Church Grove site.

I am sorry I can't provide any more definitive news at the moment.

However, at the meeting this morning we did agree that the council would keep resident representatives updated as the site search progresses.

Yours sincerely

Cllr Heidi Alexander

Deputy Mayor and Cabinet Member for Regeneration

This clearly shows that the Council thought Church Grove was no longer suitable for a site because the original traveller requirements had changed and because they now needed a site for 9 pitches. It also acknowledges that some of the factors that made Church Grove the preferred site before no longer existed – yet the Council is still claiming that Church Grove is the first preferred site! Previously, as already stated, the lorry park in Catford was actually scored first, which raises the obvious question of how it's possible for it not to be first again especially in light of Church Grove's now reduced special considerations.

3. Planning permission showing as 'withdrawn' from the Council's planning website, re-entered some months later as 'granted'

We believe this may be illegal, and certainly at least raises residents' and other stakeholders' legitimate expectations that the site was not going to be used as a Travellers' site. We know of two residents close to Church Grove who bought properties recently on the basis that their searches showed this permission had been 'withdrawn'. Clearly, this is the very opposite of early consultation.

4. Consultation process flawed, mismanaged and deceptive

The consultation letter refers, again, to traveller caravans being only 2.2m wide. When the Mayor visited Church Grove recently, Steve Gough publicly apologised to the residents for getting this fact wrong – he accepted, in front of the Mayor, that Traveller caravans can be up to 2.55m wide with another 0.5m required for extended wing mirrors, and promised that he would instruct his officers to stop informing people at drop-ins wrongly. Clearly, therefore, the consultation is flawed: stakeholders have not been told the full extent of the key problem. The consultation letter has not been reissued or even amended, and the Council's website has simply removed the relevant section, i.e. so there is now no mention of access at all.

The consultation letter states that as residents' questions are raised they will be put on the Council website. However, at three days before the consultation closes there are no questions on the website, despite dozens having been raised in writing and at drop-ins/meetings. Also, at the first drop-in session, Steve Gough promised to answer residents' questions during the process: to date, he has answered none of them. This is gross misconduct on the part of the Council and Mr Gough in particular.

At the request of the Mayor, Steve Gough has commissioned an independent report into road issues around Church Grove. When asked at the last public meeting why he has not re-started

the consultation or at the very least amended it, he said he was waiting for the results of the report. Apart from the fact he had had the report for several days at the time of this meeting, this was a clear lie: he had already admitted the consultation letter was wrong. We now have a situation where it looks as if the *key* information residents need to respond to this consultation will not be made available until *after* the consultation has ended. This is in breach of government guidelines on good consultation practice. At the time of writing, the residents have requested several times in writing that Steve Gough impart the content of this report but he has not even answered them. Residents will be putting in a formal complaint about Mr Gough's behaviour in this matter.

5. Traveller consultation

As said, government guidance recommends early consultation with both communities. Yet it appears as if the Council has not been able to even find any travellers to consult with about this site, other than two ladies who were kind enough to meet some residents just over a week ago. Those ladies did not express any desire to come to Church Grove. Therefore, the Council has failed to consult its intended population of travellers for this site. Given the Church Grove residents have shown ample reasons why this site is not suitable, where is the Council's evidence that the Travellers' community believes otherwise?

6. No Justification/Need

Simon Raper, a resident and statistician, has shown in writing to the Council how the Needs Assessment made by Local Dialogue is seriously faulted. The Boyer report says the same. Common sense alone shows that nothing solid can be deduced from only 11 returns out of an estimated Traveller population of nearly 500. In any case, there was very little need (as opposed to wish) shown in even those eleven returns.

I believe the Council may also be guilty of misconduct in this respect. At one of the drop-ins, I pointed out to Kplom Lotsu (Steve Gough's assistant) the lack of evidence in the assessment for need. He assured me that, since the assessment was concluded, the Council has been working hard to find more travellers who want to come to Church Grove. In other words, the Council is trying to stretch what is now a closed assessment – and which the decision to consult on Church Grove was based on – by actively seeking out and persuading Travellers that they should live there! This seems at least absurd, given the huge shortage of housing in Lewisham required by people with a legitimate need. It also smacks of maladministration.

7. Access

The Council is well aware of the issue that Church Grove is too narrow to take regular traveller traffic. I refer you to the reports by Boyer Planning and Anderson Associates which fully support the residents' research to show that, for example, traveller caravans are frequently too wide for the available access, e.g. 3.05m (2.55m plus legally required extended wing mirrors at 0.5m) needing to traverse a 2.6m road space (as measured by the Council).

Even if a lorry plus caravan traverses the narrow pavement on the non-parking side (0.9m), it will be in grave danger of causing damage to parked cars, fences/hedges, and indeed to residents who step on to the pavement unsighted.

The Council has used the argument that its refuse lorry accesses the street and that is 2.5m wide. We have pointed out to the Council, however, that in fact the lorry rarely comes down the street, but stops close to the Ladywell Road end. On rare occasions when it has come further, it has had to drive along the pavement. The point being that it is much easier to control a fixed base vehicle performing such a manoeuvre than it is to control a lorry pulling a large caravan.

The argument the Council used in the first round of planning was that the Thurston Road travellers only had small caravans and "didn't travel", i.e. it's not much of a problem. We dispute even this argument, on the grounds that the Council should not be building a travellers' site that curtails their natural right to travel. Also that in any case there is photographic evidence that the Thurston Road site was host to lorries, i.e. that there would have been daily in/out movement of lorries along Church Grove even under the old scheme.

The Sanderson report, however, points out that there is likely to be far greater movement of heavy traffic to and from the Church Grove site, to quote:

"Evidence accepted by consultant's representing Travellers at a recent public inquiry, Inspectorate reference APP/M2325/C/10/2134060-74 and APP/M2325/A/2134042 was that from figures drawn from the TRICS database system (the industry standard for assessment) a level of 10 trips per pitch was to be expected in a 24 hour period. This level of use is higher than that of a normal dwelling which is in the order of 8 trips and lower, per house per day. As such the 5 proposed pitches would generate 50 vehicle movements per day, all of which traffic would be new to Church Grove."

In other words, the volume of heavy traffic along Church Grove is going to be far higher than the Council has allowed for. This will greatly exacerbate tension between the two communities, which of course works directly against government (DCLG) guidance that Local Authorities must ensure the needs of both communities are catered for.

Where static caravans/mobile homes are concerned, the Council agrees that these at least will only be able to transfer down Church Grove if the residents' cars are removed. What the Council does not appear to have considered, however, is how exactly these homes will reach the site. We've spoken to a firm which specialises in moving travellers' static caravans and after looking at the street on Google Maps they didn't believe a flat-bed lorry (required for transporting sections that can be 45ft in length) would have enough space to turn into the street or into the site. Therefore, it would be necessary to park the lorry in Ladywell Road, thereby blocking one lane of a very busy road; then unload the static caravan section, which would then block the other lane too. Then it would be necessary to push the section by hand along Church Grove.

We have pointed out to the Council that anyone with a zone B parking pass can (and does) park in Church Grove. Therefore, it's extremely unlikely that the Council will be able to contact the owner of every car, each time a static caravan or mobile home is moving into or out of the site. The Council's own needs assessment states that Lewisham travellers have a high degree of mobility. In other words, families will be moving in and out of the site perhaps up to 5 times a year, which equates to 10 movements of their buildings, each movement requiring two lorry loads. Even if travellers inform the Council each time they want to move, timings can change at the last minute. Also, the Council will have to arrange in advance for residents' to move their cars. Apart from car owners who are not contactable, the Council is being naïve to say the least if it believes every Church Grove resident is going to willingly comply with this regularly-occurring inconvenience.

Astonishingly, at the last public meeting Steve Gough, when this point was put to him, admitted 1) that the Council would have to use a crane to lift some cars off the road, and b) that this is an illegal act! Apart from the fact that such cars would in actuality have to be lifted out of the street - since being placed on the pavement will still not provide sufficient access for a mobile home – the Council cannot possibly suggest a solution to a problem with its plan that requires it to break the law!

This issue in particular has proved to residents that the Council cares nothing for residents' well-being and is only interested in fulfilling what it sees to be the cheapest and most convenient solution to a piece of land it has spare. Every single person who's seen the street – from Joan Ruddock to guests to the residents' website (www.savechurchgrove.com) - has expressed the common sense view, usually accompanied by a mixture of horror and amusement, that this is a totally unsuitable road to provide access to a travellers' site.

We are in the absurd situation where for four years, neither Mr Gough, nor any Council official, nor various councillors, has been apparently able to pick up a telephone and contact a caravan authority (details of which have been supplied by the residents to the Council on numerous occasions) or spend 15mins on the internet to discover that traveller touring caravans are frequently 2.44-2.55m wide and not only the 2.2m that the Council believes (although Mr Gough has since admitted he got this wrong).

The situation has been exacerbated by a change in the law in 2010, regarding towing. Before, cars were allowed to pull caravans only up to 2.3m in width. Now, they can pull caravans up to 2.5m in width (as long as they're under 7m in length: longer caravans, preferred by travellers, still need to be pulled by lorries) – bringing the UK in line with the rest of the EU. In other words, there will clearly now and in future be an increase on UK roads of wider caravans, and therefore an increase in these bigger vehicles coming to and from Church Grove. This, incidentally, is one of many changes in situation/law that invalidates the Council re-visiting the planning permission.

8. Conservation

The original plan was in clear breach of the Council's own rules for a Conservation Area (which Church Grove is in), i.e. that any nearby developments should be in keeping with the area. Previously, the Council failed to explain how caravans and mobile homes can be in keeping with a conservation area. It promised to spend more than the usual amount of money on making the utility blocks blend in with the surroundings. This time, it has failed to answer whether or not extra funds are still available, i.e. if as is likely they are not, going ahead with the plan will be in even further breach of conservation rules.

9. ROI considerations

With the introduction of the Localism Act on 15 November 2011, the Council no longer has a statutory duty to provide traveller sites. By contrast, it does have a statutory duty to provide more sheltered accommodation, for which there is a great and growing need in Lewisham. The Council has been contacted by The Lewisham Almshouse Charity expressing an interest in the Church Grove site being used for sheltered housing. Given the problems of access and heavy rate of traffic which comes with a traveller site (see the Boyer and Sanderson reports), we believe this would be a much more appropriate and needed use of the site.

10. Bad weather dangers

One of the many considerations the Council has failed to make is the additional health and safety risks which will arrive with bad weather (see the residents' commissioned reports). Clearly, the access width on Church Grove is already severely limited; and given that a caravan is hard enough to control in ideal conditions, there is a strong likelihood of damage to cars, property and residents themselves from the frequent movement of lorries, along with caravans at times, to and from the site.

11. Nuisance of dogs/quad bikes

In its first set of plans, the Council stated that it would not install a gate across the entrance to the site. Travellers are well known for possessing more dogs than usual, and their children often have quad bikes. Without a gate, both dogs and bikes are likely to run along the street, potentially endangering residents, particularly the young children who may be crossing it.

12. Lack of good management

Councillor Egan took some Church Grove residents to see a well-managed site in Hackney. While the residents were impressed with what they saw (although access is not a problem there: travellers do not have to pass through residents' community space to get in and out), it highlighted another weakness in the Council's plans. The Hackney site is visited every day by an experienced manager, and the travellers living there agree that this is key to the success of the site. The site manager herself insisted this would need to be done at Church Grove too (she also said no site should go ahead here until the access problem is sorted out). Yet the Council has stated that it will not be spending money on this level of management at the Church Grove site.

13. Public and Press Support

Support for the residents' position – i.e. not against travellers but against the total unsuitability of the Council's plans – has been virtually unanimous. The online petition at our website has received (at the time of writing) 417 signatures – a very high number considering this is a tiny street of only 19 houses.

As mentioned above, Joan Ruddock has publicly expressed her view that Church Grove is totally unsuitable for a travellers' site.

I strongly suggest the Council studies our website, including the many public comments expressing shock, surprise and outrage at this proposal.

14. Conclusion

It seems incredible to us that our own Council – comprising elected representatives of the people – has over the past four years shown absolutely no interest in our legitimate concerns over this proposal(s).

It has shown commendable concern for travellers' needs; however, this has been out of all proportion both to the concern it has shown us and to the current situation where it cannot even find any travellers who want to live at this site.

The Council has also ignored key government advice on early and thorough consultation both of travellers' and residents' communities. It has launched a consultation without explaining what the consultation is *on*. In the consultation letter it provided false information on key elements; later admitted this was the case, promised to put it right but didn't; commissioned an independent transport report (an act in itself which should at least have stopped the consultation) which it subsequently refused to show residents before the consultation closes.



Terry Edge

The Council is consulting on the former Watergate school site in Church Grove as the preferred location for a site for Gypsy and Traveller families.

The Council would like to hear the views of residents and other interested parties on this proposal. In particular, we would like to know if there are any factors which you feel we may have overlooked in our consideration of the site which would make Church Grove unsuitable as a site for Gypsy and Traveller families, or if there are reasons why another site in the borough is in fact more suitable.

(Please use as many pages as you need.)

Please see enclosed pages.

Name *June Broome* Postcode *SE13 7UT*

(We are asking you to provide your postcode as we are looking to understand in which part of the borough participants in this consultation live.)

I object to the use of the Watergate site for travellers for the following reasons:-

1. In the Town Centre Action Plan published in March 2011 under "OPTIONS - Ladywell Road character area" - Page 34 option 3, it states that further consultation on the 7 short listed possible travellers sites would take place in April/May 2011. This did not happen. I was told that this was replaced by a so-called "Independent report". This report had 5 senior Council Officers listed as contributors on the front page. There was no independent research into the wishes of the travellers but the report itself was not independent.

As a result there has never been a consultation on the 7 sites as promised in the Action Plan and we are left with a consultation on one.
2. The Council had obtained planning permission for 5 pitches on the Watergate site but did not proceed with it as I understand it did not comply with Government Guidelines on Travellers sites. Has this guidance changed? Does the site now comply? I believe the travellers also agreed to surrender their licenses for housing and/or financial remuneration.
3. No contact was made with Church Grove residents or myself. I share a long boundary with the site and the first I heard of the proposal was when a reporter questioned residents in Church Grove. This gave us all only 2 days notice of the Mayor's cabinet meeting on Oct 5th. Why were we not properly informed & given reasonable notice of the meeting? The only official contact I have had from the Council was a leaflet hand delivered about 3 days before the Drop-in session. After the consultation had begun on Nov 12th.

④ Through a councillor I obtained a copy of the 'Independent report' and was amazed that the problems of the access to the ^{site} was not mentioned at all. Why not?

⑤ Not is the fact that the site is more or less embedded in the St Mary's Conservation Area which covers the historic centre of Lewisham. Why not?

In contrast, the proximity of the Catford & Deptford sites to conservation Areas is mentioned.

⑥ The proposed provision is for an amenity block (kitchen bathroom etc), space for a living caravan, space for a touring caravan and space for a lorry and amenity space. This compares with the 45 flats or so which have planning permission or have recently been built in Ladywell Road with ONE disabled parking space! Meanwhile the local residents are obliged to pay the Council ~~for~~ to park in the road (if they can find any room). This does not appear to be a fair distribution of available space.

⑦ There does not appear to be much interest in the traveller community (currently none living in caravans). Of the 3 forums arranged with them, I attended the first, none the second and one the third. This is a proportion of 10 out of 400 travellers in the Borough. It does not indicate a real need.

⑧ This is a valuable urban site suitable for affordable family housing, of which there is a great need in Lewisham. This housing would be available for travellers and ~~other~~ other families ~~in~~ ~~need~~ according to their needs.

Peter & Susan Scott-Cooksey
11 Church Grove
London SE13 7UU

16 December 2011

CHURCH GROVE TRAVELLERS' SITE CONSULTATION

We are writing this letter under duress. We resent being put in a position to protect our community once again from a Council that is truly fully aware of the inappropriateness of Church Grove as a site for Travellers yet continues to manipulate and distort needs assessments, figures, facts, and government guidance in their relentless pursuit of a Travellers' site in Ladywell.

You will shortly be in receipt of a dozen or so letters from angry residents of Church Grove; the best of neighbours who we personally are indebted to for their time and in-depth research; their open and intelligent manner, their dedication to opposing this proposal for the benefit of Church Grove, Travellers and the wider community.

We fully support them.

This entire consultation is seriously flawed as it is based on **previous planning permission which was subsequently 'withdrawn'** (two residents close to Church Grove recently bought their properties on the basis that their searches showed this permission had been 'withdrawn'.)

Irwin Mitchell's advice to us is that the Council has only limited scope for revisiting the previously granted planning permission, i.e. it has a duty to reconsider the desirability of implementing it so long after it was granted when circumstances and knowledge have changed.

Support for our belief the Council no longer wanted Church Grove for a travellers' site was supplied in this email:

Fri 13th February 2009

Email from Heidi Alexander (then Deputy Mayor, now MP for Lewisham East)

Dear Simon

I am sorry not to reply to your email sooner. I had a meeting with some of your neighbours this morning so it may be that an update has already reached you but if not, the summary is as follows:

Towards the end of last year the travellers living on Thurston Rd expressed concerns about moving to a new site on Church Grove and asked the Council if it would consider terms for the surrender of their licences. The travellers, with legal representation, agreed terms and vacated Thurston Rd at the beginning of this month. The Council is now undertaking a site

search for an alternative single site of a minimum of 9 pitches and the results will be reported to the Mayor when it is completed.

Whilst I can't guarantee that a site won't be built at Church Grove (as it will be considered as part of the site search), the need to relocate the long-term residents of Thurston Road due to the town centre redevelopment plans no longer exists and as such some of the factors that affected the selection of Church Grove as the council's preferred site are no longer relevant (i.e. the need to keep the site in the vicinity of Lewisham town centre and the need for a site that could be delivered quickly). London-wide research has also been conducted which suggests that Lewisham requires a minimum of 9 traveller pitches (as detailed above) and this number of pitches would not fit onto the Church Grove site.

I am sorry I can't provide any more definitive news at the moment. However, at the meeting this morning we did agree that the council would keep resident representatives updated as the site search progresses.

Yours sincerely

Cllr Heidi Alexander

Deputy Mayor and Cabinet Member for Regeneration

Access Issues

The consultation initiated in late 2007 saw the site as an answer to the proposed Thurston Rd development. The circumstances surrounding the initial proposal have changed substantially; a whole new planning application needs to be submitted together with a full consultation giving detailed attention to the access issue that was previously dismissed by Council.

Council has subsequently admitted, and the Mayor agreed, that access is a major problem. Joan Ruddock also supports this view.

Reports by Boyer Planning and Sanderson Associates, commissioned by Church Grove residents and submitted on our behalf, supports our arguments that Church Grove is unsuitable for increased vehicular traffic and caravan. Sanderson Associates estimate use to and from the site to be 50 vehicular movements per day (based on TRICS database system – the industry standard for assessment) all of which would be new to Church Grove. Furthermore it concludes that the use of Church Grove for access '*has the potential to materially affect the safety of residents and the general public on the public highway*'.

No consideration has been given to the effects on access of poor weather conditions or road camber. London has seen progressively colder and icy winters. Church Grove has never received a visit from the gritting lorry or snow plough... I suspect access would be a problem.

Consultation process flawed, mismanaged and deceptive

- Incorrect information regarding caravan widths consistently and intentionally used to mislead the public re access issues

- Access – Church Grove is too narrow to take regular Traveller traffic which would endanger residents and the general public
- Council/Steve Gough refusal to answer resident questions at drop-ins/consultations
- Reluctance of Council/Steve Gough to share findings of reports commissioned by council in a timely or unabridged manner
- Needs assessment statistically flawed. *“Government guidance states that a credible evidence base requires statistically significant results. The sample used by Council is statistically too small to be of any value.” (Boyer Planning)*. Nothing solid can be deduced from only 11 returns out of an estimated Traveller population of nearly 500. In any case, there was very little need (as opposed to wish) shown in even those 11 returns

Conservation

Central and local government policy ignored with respect to *“preserving or enhancing the character and appearance of a conservation area.”* Caravans and mobile homes cannot be considered in keeping with a conservation area.

Lack of good management

Councillor Egan/Lewisham council took several Church Grove residents to visit sites in Hackney. These sites were well managed by a dedicated team and we were impressed by what we saw. Senior site officer Angela Emmerson, and travellers living there, agree dedicated management is key. **Lewisham Council has no resources for a dedicated management team** and will leave it with the local housing division who have no practical knowledge of Traveller issues/needs. In Hackney, the robust management team is there to ensure community cohesion and any incidents that arise are swiftly and fairly with equal weight given to both Traveller and settled community.

Neither of the sites visited had similar access issues to Church Grove; travellers do not have to pass through residents' community space to get in and out. Angela Emmerson stated that the access issue needs addressing as a priority before all else. She also claimed the inclusion of a 3 meter fire break/perimeter access road separating the site from neighbouring properties is also of essential importance. Church Grove plans do not allow for this.

Conclusion

This proposal must be discarded now. It is clearly the wrong site for a development of this nature and with the introduction of the Localism Act on 15 November 2011 the Council no longer has a statutory duty to provide traveller sites.

However, Lewisham has a duty to, and would be better served, by Council providing much needed green sheltered accommodation, for which there is urgent and growing demand. We

understand the Council has been contacted by The Lewisham Almshouse Charity expressing an interest in the Church Grove site being used for sheltered housing. Given the problems of access and heavy rate of traffic which comes with a traveller site, we believe this would be a much more appropriate and safer use of the land.



Peter & Susan Scott-Cooksey



Richard Williams
3 Church Grove
Ladywell SE13 7UU

Response to Travellers and Gypsies site proposed for former Watergate School Site

NEED

The Council sent questionnaires to 100 traveller and gypsies families and 11 replied. The Council admits there is no NEED for housing but three expressed a "desire" to move to the Church Grove site. Statistically this is of no value and should not be used.

There was no reassessment of previous sites or potential new sites, i.e. Thurston Road, Catford Dog Track (travellers and gypsy sites are recommended for inclusion in new housing developments by the DCLG), Catford Lorry Park.

The Church Grove site must be a transient site as the previous Thurston Road travellers surrendered their licences and live in social/private rented accommodation and have no housing NEEDS. A transient travellers' site will cause an enormous amount of upheaval for the whole of Church Grove because of its inadequate and narrow access.

PLANNING

The Church Grove site will be a caravan/mobile home park. It will not enhance St Mary's Conservation area as requested in the Lewisham St Mary's Conservation area document.

The plans proposed have no architectural merit.

The site is on a high risk flood plain, especially dangerous to caravans and mobile homes and is against DCLG advice. Raising the site level as stated in the plans will exacerbate any flooding of residents' houses in Church Grove.

The site is contaminated, which is again against DCLG advice.

It has very narrow access from Ladywell Road to the site, again against DCLG advice. To date there has been no expert traffic assessment of the feasibility of access to and from Ladywell Road onto the site in Church Grove by vehicles used by travellers.

There is no three metre clear area around the site perimeter to act as a fire precaution as required by the DCLG.

CONSULTATION

The drop-in leaflet distribution was unfair. The natural boundaries to the site are the two railway lines, Lewisham High Street and the footpath between St Mary's Church and cemetery. Distribution to Marsala Road was totally irrelevant.

The narrow access problem has been known of since the site was chosen (it's biggest disadvantage stated in the consultant's report) and yet there is still no traffic expert access report after five years.

ECONOMICS

The Church Grove site is 3,425 square metres in area. It cannot be justified to use this site for just five families when it could provide much needed residential housing for 30-50 families or sheltered homes for elderly people.

In conclusion, Thurston Road "became unfit for purpose" because of the Council's neglect and lack of management. We know that if this poorly-thought through and researched proposal goes ahead in five or six years time the site will become an eyesore.

This specific site is unfit for this purpose.

Jan Cook
3 Church Grove
Ladywell SE13 7UU

Response to Consultation on Proposed Gypsy and Traveller site in Church Grove, Ladywell

Validity of the consultation

I refer to the Report entitled Travellers' Site – Needs Assessment and Site Consultation which recommends consultation with the residents of Church Grove site. The document is not one of consultation as is stipulated since it is stated (point 2.3) that the purpose of the report is to “agree to consult on the Church Grove site as the preferred site to meet” To agree to consult implies that the original planning application made in 2008 and the abandoning of that proposal (Steve Gough's letter to Simon Raper dated 30/11/10) is being resurrected, particularly since there is no new consideration being given to alternative sites. Therefore, Church Grove cannot be preferred over others until a full consultation is carried out. The situation now is different from that of 2007/2008 and this changes the basis of any consultation. It also implies that there is pressure to meet a deadline of April/May 2012 which would necessitate a side-stepping of adequate wide-reaching consultation that a proposal of this nature requires.

Had Lewisham Council acted in good faith in its consultations with all residents of Church Grove and the surrounding area it would have provided a wide range information at the drop-in sessions, have given answers to questions in an unambiguous way and had more officers of sufficient seniority with a breadth of knowledge available to demonstrate its commitment to the involvement of local people. In 2007 residents were invited to an exhibition of the planning proposal and to meet officers, architects, management services, travellers liaison officers, and an independent advisor/trainer. The deputy mayor was also in attendance. Having been told clearly and unambiguously that the Planning Application would not be renewed, the Council ignored its own recommendations that residents be involved at a very early stage (Statement of Community Involvement) and allowed Church Grove residents to learn about the resurrection of the plan by way of a local journalist, thus giving us two days notice in which to get ourselves informed and involved.

Government Circular 01/2006 states that the interests of the settled community have to be respected in the planning for traveller sites. As a community we have carried out many of the responsibilities the Council has in affording that respect. This would include the demand for a public meeting, research into caravan widths, legal requirements for road and pavement widths, vehicle access assessments, meeting with travellers, regulations on fire and emergency services involvement in planning and providing information to the wider public of Ladywell on Conservation Area obligations.

In our attempts to ensure that the Mayor is presented with a fair and accurate representation of residents' views upon which he will make his decision whether to proceed or not, we have been forced to demand co-operation when it has not been forthcoming; hardly affording the respect we are entitled to.

I therefore challenge the validity of the Consultation is on the grounds that accurate, up-to-date information is not provided to the public upon which it can make informed comment. In saying that, the Church Grove community has got itself informed and my response is based on that.

Access

The problem regarding access was highlighted during the previous consultation process 2007/2008 and no updating of information nor research had been done when the Report was presented to the Mayor and Cabinet. The validity of the consultation can be challenged on the key point of access since no assessment had been done and yet was used as a determinant in the list of site options, thus distorting the weighting.

Had this be included and the emergency services consulted (which they were not) it would have made clear that the accessing to the site by vans towing caravans puts pedestrians at risk and disrupts traffic flow in a busy main road, assuming of course that there was no illegal parking at the junction of Church Grove and Ladywell Road when access would be impossible anyway. As this is the only point of access to the proposed site (against DCLG guidance on planning traveller sites) I am left wondering why this particular location is tailored, in the report to the Mayor, to the perceived need for a traveller site at all. Pedestrians would be put at risk at several points. Ladywell Road is used by people walking from Ladywell Station and Ladywell Village, being particularly busy at peak travel times in the evening. There is a bus stop immediately opposite the entrance to Church Grove which services four north bound bus routes. Access assessment using the current measurements for most widely used caravans indicates that towing vehicles may well need to use the lane in which buses stop in order to manoeuvre and would also approach pedestrians waiting at the bus stop itself.

In not bringing itself up-to-date with information on caravan widths and the legal requirements under EU law changed in 2010 for towing vehicles, the consultation makes a nonsense of the Council's duty to make informed decisions in the interests of both travellers and the existing community. It adhered to 4.5 year old figures regarding caravan sizes, as well as the vague, unsubstantiated comment that Lewisham travellers rarely travel. It cannot, and should not, be stated as the November letter to residents does, that static caravan movements would lead to "limited inconvenience to residents". This simplifies and underplays what would be a major disruption to all users of Controlled Parking Zone B, not just Church Grove residents as stated in this letter. The term "in reality" is used in this connection when the Council cannot know what the reality is or likely to be in future.

Half of the houses in Church Grove are fronted with small gardens and an illegally narrow pavement. The residents of these houses, including young children, are required to use the road to walk along. It is here where it is necessary for vehicles of 2.6m and above to mount the pavement in order to

complete their journey and where wing mirrors are at adult head height. The 2.6m measurement does not include wing mirrors – essential when towing. Photographic evidence shows that the road camber can, according to the vehicle height, add to the risk of possible impact.

An access assessment would have revealed these dangers.

Needs Assessment

The letter dated 4/11/11 circulated to residents outlines briefly Lewisham Council's duty under the Housing Act 2004 to undertake regular assessments of gypsies and travellers accommodation needs. Had these assessments been carried out regularly it would have been known exactly what the need was without resorting to the commissioning of an independent needs assessment upon which the decision was taken to build a site for travellers and to hastily 'consult'. The letter goes on to refer to "a site search undertaken earlier this year which resulted in a shortlist of seven sites". This is untrue and simply a regurgitation of the site search made in 2007. If it had been conducted as was said the Council had a responsibility to inform residents, which it did not.

I refer now to the Report to the May and Cabinet dated 5th October 2011 in my response to the needs assessment. The acknowledged fact (point 6.2 "The aim of the study was to establish links and to engage members") is that regular assessments of accommodation needs were not carried out as stated in the same letter. It would seem that since the original five families from Thurston Road had relinquished their licences, travellers remaining in the Borough were housed in social housing or privately rented accommodation. The commissioned assessment of needs report is based on flawed and poor research. It is acknowledged that there was difficulty (point 6.4) in determining the number of traveller families in the Borough and of the approximation of 100 families, 12 engaged in the survey. Of these three were satisfied with their current accommodation, six were unsatisfied but not because they were living in bricks and mortar and three said they were experiencing health problems due to living in housing. Whilst this may be of concern it cannot be the basis of an informed choice to provide between four and nine pitches. As the Report says demand does not equate to need. I can only conclude from this that the pitches are intended for transient travellers with a need for pitches, with the consequences of increased traffic movement along Church Grove, difficulty in site management and the building of relationships with the settled community.

Conservation area considerations

Drop-in sessions and the public meeting did not disclose in full detail the relationship between the proposal and the fact that the site is located on the boundary of St Mary's Conservation Area. The only reference to it was on an A4 sized sheet showing a map. This was left lying on tables alongside site plans which in themselves gave no indication that the CA boundary existed at the entrance to the proposed site. I requested at all sessions involved in the consultation that this be included since the Council's own Planning Policy contained in the St Mary's Conservation Area character appraisal states that the Council "has a duty to pay special attention to the desirability of preserving or enhancing the character of such areas". It would seem that by this action the Council is absolving

itself of this responsibility and in so doing ignoring central government's planning policy in relation to conservation areas (PPS5: Planning for the Historic Environment). An example of the inconsistency in the Council's attitude to planning can be illustrated in the case of Riley's Pool Hall site. Here a planning application was rejected on the grounds that it "failed to respect the character and appearance of this part of Lewisham High Street" even though Rileys is outside any Conservation Area and is not on the boundary of one. When asked, planners were unable to say how exactly a site for travellers would enhance the CA.

Whilst this omission may not be unlawful it again represents a disingenuous attitude towards community involvement in what happens in its locality and the duty it has to respect the needs of the settled community of Church Grove.

Community Cohesion

The Council must have due regard to the need of "foster good relations between people who share a protected characteristic and those who do not" (Report to Mayor and Cabinet dated 5th October 2011, point 12.4).

Fostering good relations begins with the building of trust. Lewisham Council officials have shown the settled community little regard since this current consultation began nor for that matter during the original planning application. We were not informed directly that it was to be discussed at Mayor and cabinet meeting, learning of this from a newspaper reporter after we had been told in writing that the Council had no intention to implement or make any application to extend the existing planning permission in November 2010 as previously stated.

Lewisham Council's Statement of Community Involvement, under Planning Applications (Point 6.2), states "pre-application discussions can provide considerable benefits in the form of establishing goodwill where the community are fully informed and feel that a proposal has taken into consideration things that matter to them."

When questions have been asked about things that matter we have frequently met with shoulder shrugs, vague answers or told that it's only guidance not a requirement. This happened with a question raised of the absence of a fire break around the perimeter of the site which is a requirement and not for guidance only. This is a model of how not to build a solid base on which to build harmonious relationships. The harmonious relationships required for two cultures to share common space is put at risk since I have no faith in the Council's willingness or ability to provide strong management of such a site. I witnessed this in Hackney when it was demonstrated that with the consistent presence of management on the four sites, an engendering of trust between travellers and management occurred. This, and excellent vehicular access contributed to the success of the sites for both travellers and the surrounding community. The problems associated with the narrowness of available road space in Church Grove will inevitably lead to stressful situations especially when caravan movements could be greater in number than anyone can predict with any accuracy.

There is no room for chance in the building of a site for travellers on any site in Lewisham. The evidence shows that when such a site is put in place before the surrounding area is developed a

successful outcome is much more likely. For this reason the former Catford stadium area which will be developed at some stage, would be much more suitable and the Church Grove site used to meet a clearly defined need. This exists in the Borough without suggesting that people from outside of it are invited in.

I urge much more careful consideration of this proposal and that the Council acts responsibly.

Jan Cook

15th December 2011

I would like to question the basis for this consultation. I do not believe it should have taken place.

I understand that the decision to consult was taken at a Mayor and Cabinet meeting on 5th October 2011 in response to a report, "Travellers' Site – Needs Assessment & Site Selection", compiled by Council officers. Having read this report, I believe the Mayor and Cabinet were misled on several counts.

Site Search

The site search reported to the Mayor and Cabinet on 5th October was based on an external report by CB Richard Ellis in 2007. This external report is now nearly five years old. The criteria for suitable sites at the time were:

- Located within easy travelling distance of Lewisham Town Centre
- Should avoid fragmentation of existing Traveller community
- Ready for occupation by the end of 2007
- Should accommodate 8 pitches (minimum area 1,800 sq. m)

Given that the situation is now very different, if a fresh search was to be conducted the criteria would necessarily be different. The occupation date is different, the size required is smaller and there is no existing community in Lewisham Town Centre. There are also new guidelines about suitability to consider (DCLG, 2008). I don't think we can assume that the results would be the same.

Note that the Watergate site was originally thought to be capable of hosting eight pitches but the Environment Agency required a flood protection zone, reducing the number possible to five. If this had been known at the time, it would not even have been shortlisted in 2007.

Council officers claim to have updated the 2007 site search, however the criteria they used are not clearly presented. The whole process lacks transparency. It is nevertheless clear from the results that they failed to take into account many of the recommendations of the 2008 DCLG Good Practice Guide to the design of Travellers' sites. They simply define suitability as within 800m of primary school, GP and food shop. Thus it appears to me that the Council has not done a proper site search. It is not objective and does not bear in mind simple criteria such as width of the access road. The fact that the site in Church Grove is shortlisted despite breaking eleven of the essential criteria in the DCLG Good Practice Guide, confirms that these guidelines have been ignored.

Option Appraisal

In the report the basis for selecting Church Grove is an optional appraisal, which has not been conducted truthfully or objectively. The way the criteria are chosen and defined is peculiar and important facts are ignored.

- Under 'suitability' issues such as access are not included, even though there are national guidelines about this that clearly make some sites more appropriate than others. For example, Church Grove has a very narrow single access road and yet the way suitability is considered this is ignored. In fact it is scored 5/5 for suitability!
- Under 'availability' it is clear that what was considered is not availability but ownership. The Catford Sadium site is available in that the current owners wish to dispose of it, but the Council do not own it, it has been scored low. I do understand that the Council would have to buy the land, but since the site in Church Grove was previously ear marked for disposal and I have been told has a value of £1.5 million, I can see no reason why the Council can't dispose of an unsuitable site and buy a more suitable one.
- Under 'alternative corporate use' the fact that the Council's own Primary Places Strategy clearly identifies Church Grove for the establishment of 2 forms of entry of primary provision as recently as April this year is ignored. Instead it is stated that there is no alternative corporate use.
- Under 'planning constraints' the fact that previous planning permission was given under very different circumstances is ignored.

In discussing the option appraisal with Council officers at the consultation drop-ins, it became clear that Church Grove is simply a pragmatic choice for the Council because planning permission has previously been given. However this position ignores the fact that planning permission was previously given under very different circumstances. It appears to me that this 'pragmatic' position also prevented an objective process of option appraisal.

I believe that a more balanced option appraisal would result in Church Grove scoring much lower and other sites such as Catford Sadium coming to the fore. It therefore seems essential to return to the criteria, ensure that they are chosen and defined appropriately, then begin both the site search and optional appraisal afresh.

Needs Assessment

The needs assessment done this year is inadequate. It only reports data from 11 survey responses, which hardly provides a proper basis for the significant investment the Council is proposing to make. Given that the report itself acknowledges that there is “difficulty ascertaining the exact level of need”, why is the Mayor and Cabinet proceeding? I would suggest that the Council needs to do a lot more work engaging with the local Traveller community before it makes any decisions. Until the actual needs of the population are known, how can any realistic planning take place?

There is evidence that small sites work when they are taken by one extended Traveller family. If the Council wish to pursue this approach, they need a comprehensive assessment of the needs of such extended families and to plan several small sites together. Otherwise there can be no fairness in allocating pitches.

The current situation leaves open the distinct possibility that the Council could build a small site in Church Grove at vast expense which is not wanted because it cannot be allocated to a family group.

Consultation

The consultation has been so poorly conducted that the Mayor and Cabinet should require it to begin again. Wrong information was given to stakeholders in the original letter to residents (e.g. width of caravans) which has not been corrected despite Steve Gough admitting it was wrong. An independent report on access was commissioned during the consultation period, which has not been made publically available. Local Dialogue, who did the needs assessment, are refusing to be questioned on their report which provides the key ‘evidence’ for the recommendation of five pitches. Participants in the consultation have therefore not had the facts available to them and in some instances have been misled.

Existing Planning permission

I do not believe that the Council has existing planning permission, although it has claimed to do so throughout the consultation. This in itself has meant that the consultation has been conducted on a false premise and is therefore invalid. The reasons I believe permission does not continue are that

- The Council wrote to residents stating that they intended to let planning permission lapse in April 2011
- Planning permission was labelled as withdrawn for several months after April 2011

- The intended use of the site is now very different from when planning permission was originally granted and surrounding guidelines and laws have changed.

For these reason, if the Council wished to pursue the proposal to place a Travellers' site in Church Grove, planning permission would have to be sought afresh. Failure to do so would in my view face a legal challenge.

Conclusions

Throughout the consultation local residents have outlined clearly the very many reasons that Church Grove is not suitable as a location for a Travellers' site. In brief this is because

- It has only one point of access into and out of the site. This creates safety concerns and potential conflict between the Traveller and settled community both of which have to share the same tiny road.
- Access down Church Grove (a narrow single lane cul de sac) is not wide enough for lorries, fire engines or caravans to drive down without mounting the pavement.
- It is on a flood plain next to the river Ravensbourne,
- No one currently living in Church Grove can take out new buildings insurance. Any Travellers moving in probably couldn't insure their homes.
- It suffers noise pollution from the railway line and Council depot opposite
- It is contaminated with toxic cadmium and other heavy metals
- It is simply too small. Previously Lewisham was required to provide 16 pitches and so it cannot now hide behind an inadequate needs assessment to claim that five pitches between 490 Travellers in the borough is sufficient.
- It is on the boundary of a conservation area, for which the local development plan specifies "a high quality design that preserves the setting of...Church Grove".

If the Council was truly committed to providing a high quality Travellers' site, it wouldn't be proposing to make do with Church Grove. It also wouldn't be in such a rush. The Mayor and Cabinet should ask for the whole process of needs assessment, site search and selection to begin afresh in a more objective and well informed manner. A new consultation on the options should then begin, with care taken to conduct it properly.

Caroline Cupitt
15th December 2011

Gloria Steemsonne

17, Church Grove

Ladywell

SE13 7UU

Response to Consultation regarding former Watergate school site for Travellers

I am writing because I think that the idea of a travellers' site in Church Grove is not workable.

I have visited 2 travellers' sites, one of 7 units and the other of 8 double units. I discussed our particular problems with the travellers themselves and the managers who have specialised in such work for 25 years.

Angela Emersson who manages traveller sites in Hackney, made it perfectly clear that without good access there will be interminable problems for the resident and the traveller community. Neither could she emphasise more the importance of the need for specialised management of traveller sites. We are only too aware of the problems caused at Thurston Road due to poor, inexperienced or absent management.

There are many other reasons that I feel this site has not been given the consideration that it needs. I will list some of the main ones even though these are already well known.

1. The site is on a flood plain
2. It's near a railway. The sites I visited were securely situated in the centre of residential areas with no such hazards

3. It's a contaminated site
4. There is only one access point and therefore there are potential fire hazards
5. The road is too narrow
6. There will inevitably be damage to peoples' property and/or cars
7. The parking problem will get worse
8. The houses are not built with foundations and are vulnerable to disturbance
9. There are much more suitable sites than this but this is the cheapest and easiest to deal with as the council already owns the site.
10. The number of residents in the road is small and therefore are more easily manipulated.
11. The wider community has not been informed officially by the Council.

The Council has proved that it does not have the necessary negotiating skills to deal with such sensitive issues, which does not bode well for the future. We were told the first time round not to expect any help once the site was in use. There has been only one recent attempt for travellers and residents to meet; we gather that they have been asking to meet with us over the years as we have with them. One wonders what information we might have shared and what conclusions might have been formed from such meetings.

To summarize I do not feel that the residents or the travellers would be served well if plans go ahead and I do not have any hope that in the future the two communities will be given the right kind of support in order to function well particularly as we are in a global recession and cuts are being made continually.

Yours sincerely,

Gloria Steemsonne

Dear Kplom,

Here is my response. I entered it on the consultation site but here is a backup. Many thanks Jeremy Broome SE13 7uu

Response to Consultation regarding former Watergate school site for Travellers

I object to these proposals under three main headings 1) Access and Planning Guidance 2) Consultation/Communication and 3) Use of Taxpayers' money and alternative uses for the Site.

Access and Planning

The report sent before the Mayor and cabinet on October 6th was very poor. It failed to even mention access. Church Grove should not have even made it onto the shortlist of seven sites (let alone come top of the matrix of sites) because it fails to meet the basic Government planning guidelines for building a Traveller's site. Please look up section four of **guidance for design of sites for Gypsies and Travellers DCLG 2007**. Church Grove fails four guidelines on access which the document says are essential the 2 most relevant are the road width should be a minimum of 3.7 metres and all roads must allow easy access for emergency vehicles. Without removing residents car parking the carriageway width is 2.6 m. Removing parking altogether in Church Grove would be a serious loss of amenity to residents of CPZ B.

In the misleading letter sent out to begin the consultation it mentions that Traveller's touring Caravans are 2.2m wide. Residents of Church Grove know that in fact they can be up to 2.55m width, not accounting for wing mirrors. This is not possible to get down the street without mounting the narrow western pavement (0.8m.) Another factor is gaining access to Church Grove from Ladywell Road, difficult enough in a car without mounting the pavement or swinging onto the opposite carriageway, let alone a caravan towed by a large vehicle. Safety of pedestrians on Ladywell Road and Church Grove will be compromised if these proposals go ahead as planned.

Other planning guidance ignored pertains to

: not building a site on a floodplain. (Remedial work proposed to raise the site by 1 m increase the flooding risk to existing residential properties nearby)

:Contamination. No proposals to remove the contamination.

:Conservation Planning rules. This proposal flouts Lewisham planning guidance for the St May's Conservation area in so many instances. Please look up the planning guidelines and adhere to them.

:Noise. Adjacent to railway and council depot.

Also plans show that the proposed pitches abut 3 properties 11 and 13 Church Grove and 57 Ladywell Road. The manager of the site in Hackney visited by some residents said there should be a buffer of 3 metres around a site for safety in case of fire or

emergency. With the flood buffer insisted upon by the Environment Agency would the site be viable for 5 pitches.

Consultation and Communication

The manner in which residents found out about this proposal can be described in no other terms than a disgrace. This has resurrected feelings in the community that this process is a farce and that the decision to use this site has already been made. The fact that that consultation with the Traveller community had begun in June with no such consultation offered to Church Grove and Ladywell residents is biased and unfair and leads one to the opinion that this is not a fair and balanced process.

Lewisham council also failed to show a need for this site with the meaningless statistics contained in the Mayor's report. (11 responses from 490 proves nothing). Why can the residents not see the interim transport report? Is it a case of changing the report until it says what the council wants?

Value for money and Better Alternative sites

Five pitches on a valuable central site like this is not good value for money. Apparently it may house just one family for a cost of 1.8 to 2 million. As these families are currently housed, would this money not be better spent on providing homes for the 18.000 people currently on Lewisham's housing list?

In conclusion this site should not have been included on the site selection in first place because of access. The other sites with better access should be revisited. Most favourable would appear to be the Catford Dog track site, which is much bigger, has proper access and the site could be included in a new development, which is the Government's favoured policy.

The Watergate site has much more potential for housing, sheltered housing or educational needs in these difficult financial times.

8 Church Grove

Lewisham

London

SE13 7UU

Friday 16th December 2011

Dear London Borough of Lewisham

I object to the proposal for a traveller site on the old Watergate school site, Church Grove on the following grounds:

1. The previously granted planning permission is no longer appropriate or relevant.
2. Planning permission was 'withdrawn' from the Council's planning website then re-entered as 'granted'. This was misleading and illegal.
3. The decision to consult on Church Grove was based on an independent traveller needs assessment that has been completely invalidated by our senior statistician. No *need* for a traveller site in Lewisham has been proved.
4. Church Grove is completely unfit for the purpose of access to a traveller site. *Boyer* Planning Consultants state this very clearly in their detailed report. The *Sanderson* report goes so far as to say it would be dangerous – particularly for children.
5. Though unsuitable as a traveller site, the Watergate site is suitable for many other purposes such as education or sheltered housing (which, unlike a traveller site, the Council has a statutory obligation to provide)

We also believe that Lewisham Council officers' conduct during the 'consultation' has been appalling and the entire 'consultation' process was entirely inadequate. During the so-called 'consultation' Council officers:

1. Failed to keep Church Grove residents informed of developments relating to the Watergate site despite spoken and written assurances that they would do so.
2. Posted and gave out written information to all consultees that was incorrect and misleading.
3. Then continued to give out this information to the public despite residents' complaints.
4. Ignored the Mayor's request [minuted 6.10.11] that residents' concerns about access and the traveller needs assessment be properly addressed. At the time of writing they have not been addressed by the Council at all.
5. Persistently ignored important questions (both spoken and in writing) from residents

relating to safety issues, access, the validity of the traveller needs assessment (on which the Mayor had based his decision to consult) etc

6. Admitted that their ill-thought-out plan involved breaking the law on two counts.
7. Withheld key documents about access from residents throughout the consultation process without giving them any reason for doing so.
8. Frustrated residents' requests for information under the *Freedom of Information Act*. We are still waiting for 2, one of which is over 4 weeks overdue beyond the required 20 working days.

Obviously we believe the Council should drop this thoughtless plan immediately but, if officers insist on wasting more time and money on this project they should at least take steps to remedy the immediate problems in the process.

A new, properly conducted, statistically robust traveller needs assessment should occur (and a new site search based on its findings if necessary). Obviously the next stage would be a new, properly run consultation. Also members of the public who were previously given incorrect, misleading information should receive an apology from the Council along with the correct information. Church Grove residents should receive an apology for not having been kept informed of developments relating to the Watergate site. Outstanding FOIs should be dealt with immediately and all new FOIs within the legally required time limit as part of the new consultation – if it happened.

Irwin Mitchell solicitors, representing Church Grove residents, agree that this consultation is completely invalid and should be run again.

The information below used by residents in their correspondence about caravan widths etc is supported in an independent report conducted by *Sanderson Highway Consultants*.

Residents' concerns about Church Grove being totally inadequate to give access to a traveller site is also completely upheld and supported in an independent report by *Boyer Planning Consultants*.

BACKGROUND

13.2.09 Following the granting of planning permission for a traveller site on the old Watergate site at the end of Church Grove and a subsequent legal battle between the Council and Church Grove residents - 3 residents (me, Terry Edge & Kim Horwood) attended a breakfast meeting with Councillor Andrew Milton, Heidi Alexander (Deputy Mayor & Cabinet Member for Regeneration), Malcolm Smith (Executive Director for Regeneration). The general content of the meeting was subsequently summarised in an email from Heidi Alexander to another Church Grove resident (Simon Raper). She ended her email,

'...at the meeting this morning we did agree that the council would keep resident representatives updated as the site search progresses.'

30.11.10 Church Grove residents received a letter from Steve Gough (Director of Lewisham's

Programme Management) saying,

"I would confirm that the Council is not intending to implement or make an application to extend the existing planning permission for the Church Grove site between now and 3rd April 2011. This means that the existing planning permission will expire on 3rd April 2011."

THE 'CONSULTATION'

4.10.11 - a local newspaper reporter told Church Grove residents that the Mayor was to look at Church Grove being consulted on again as the only proposed site for travellers. Despite assurances from Malcolm Smith & Heidi Alexander (above) that we would be kept informed this was the first we had heard on this subject since our breakfast meeting.

6.10.11 - Church Grove resident, Simon Raper, was allowed to speak for 2 minutes at the Mayor and Cabinet meeting on behalf of Church Grove residents. The main concerns he raised were about inadequate access for traveller vehicles up Church Grove (the only access to the Watergate site) and, as a statistician, he vehemently questioned the validity of the Council's traveller needs assessment. Although he agreed to another consultation for the Watergate site, the Mayor acknowledged residents' concerns saying he wanted the issues of access and the validity of the needs assessment addressed and he would be prepared to extend the consultation process to do that if necessary.

5.11.11 Church Grove residents received a letter from Steve Gough saying, *"...planning permission for the Church Grove site is still capable of being implemented until 3 April 2012."* and demonstrating that the Council was intending to implement it. [directly contradicting his previous letter to residents 30.11.10 quoted above]. Despite previous assurances from Malcolm Smith and Heidi Alexander [quoted above] that residents would be kept informed of the site search processes the first information local residents got from the Council was this letter – the start of formal consultation with the Watergate site as the *only* site option. The letter told us there had been a site search, *'undertaken earlier this year [which] resulted in a shortlist of seven sites [from which] Council officers recommended Church Grove as the preferred site.'* This letter also particularly angered residents because it totally dismissed their concerns about the 2 issues the Mayor had said should be addressed - access and the needs assessment.

9.11.11 I wrote an email to the Mayor reminding him of his public request at the Mayor & Cabinet meeting (5.10.11) that residents' concerns about the needs assessment and access be properly addressed and that he said he would be prepared to extend the consultation period in order to do this. I told him that in fact his words had,

...“been completely ignored by council officers. On 5th November residents received a letter about the 'consultation' on Church Grove. It dismisses both issues. It says that access was 'previously dealt with in the last planning permission'. On needs assessment we are just told that, 'an independent assessment [was] undertaken in 2011' and that Church Grove is 'being recommended as the preferred site to meet the current need'. Simon Raper was also told in an email dated 4th November that a '6 week consultation period is perfectly adequate'. So firstly I would like to ask that you insist on your requests being addressed.

The consequence of your requests being ignored is that the entire community is now being deliberately misled by the Council's consultation letter.

Eg regarding caravan width: the letter claims that 'touring caravans are 2.2m wide'. You know how relevant this is because the useable access width of Church Grove is 2.6m. The Department for Transport; the National Caravan Council and every other expert organisation we have spoken to say that touring caravans are frequently 2.55m wide (some of the supporting documents are on our website www.savechurchgrove.com). This fact has been brought to the attention of the Council officers in writing and in Simon's speech. So my second request is that you will now take action to address the 'misinformation' that has been circulated to the local residents of Ladywell."

I waited 3 weeks for a reply. See 30.11.11 below.

12.11.11 The misleading, incorrect information was still being handed out to the public at the Council-run 'consultation' drop-in. We got a video recording of Steve Gough admitting that he still had no idea how wide caravans are or how they were going to get up Church Grove. On the same video there is footage of angry residents telling Steve Gough that the information he sent out was wrong and asking what he was going to do to set things right.

18.11.11 The misleading, incorrect information was still being handed out to the public at the Council-run 'consultation' drop-in. Council officers still had no idea how wide caravans are or how they were going to get up Church Grove but admitted that if caravans were driven along the pavement that would be illegal. Aileen Buckton (Lewisham Executive Director for Community Services) agreed with resident Simon Raper that the misleading information should not have been sent out to local residents.

23.11.11 The Mayor visited Church Grove. Again he voiced his concerns about access. Again residents said how angry they were that incorrect, misleading information was still being given out to the public. Finally Steve Gough apologised for this misleading information being given out and said that it would not be given out at the drop-in the next day. It wasn't but local people have never been apologised to or sent out correct information.

30.11.11 As my email [9.11.11] was effectively a complaint against Council officers and addressed to the Mayor I was very surprised to receive a response (3 weeks later) from Kplom Lotsu (Lewisham Council Project Manager for the proposed traveller site). I wonder if it is usual procedure for complaints about Council officers to be responded to by those Council officers themselves? In his response Mr Lotsu ignored what I had said about the needs assessment and information misleading the public; insisted that the consultation period would be only 6 weeks and said they were taking 'independent advice' on access.

I responded on the same day,

"We are very grateful to the Mayor for taking up our concerns about access and insisting on an independent access report being done. I assume that he has passed my email on to you so that you can deal with my second request ie that action is taken to address the 'misinformation' that has been circulated to Lewisham residents.

*One of our main objections to the Watergate site being used as a traveller site has always been the problem of access down Church Grove. In your email below you agree with this,
[The issue of access and the width of caravans is something we are taking very seriously are taking](#)*

further independent advise on.

Yet the only information document the Council has sent out to consultees (4.11.11) totally dismisses problems with access saying that it,

'was previously dealt with in the granting of planning permission'.

Clearly it was not dealt with or you would not be having to deal with it now.

The document also states, correctly, that the useable carriageway width of Church Grove is 2.6m. It then says, 'typically, touring caravans are 2.2m wide...This would enable touring caravans to use the street with limited clearance'.

Firstly that is NOT the typical width of a touring caravan and secondly, even if it were, when you're talking about the logistics of getting caravans through a gap obviously you have to talk about the biggest that would have to fit through (which is 2.55m+50cm compulsory wing mirrors = 3.05m).

Anything else is just nonsense!

The paragraph concludes,

'The width is therefore considered adequate to enable the movement of caravans and emergency vehicles'.

In fact 3.05m wide vehicles will NOT fit through 2.6m carriageway and emergency vehicles such as fire engines CANNOT access this site (see www.savechurchgrove.com or ask Lewisham Fire Chief!).

There are many 'consultees' in the area whose only source of information has been this Council document. It is completely misleading. It deliberately and falsely reassures local residents that caravan access will not be a problem. This letter was still being given out to members of the public at the consultation meeting on Friday 18th Nov - 6 days after I had pointed out this error to Steve Gough (12.11.11 - you can hear me doing this on the online recording www.savechurchgrove.com). At the consultation meeting on Friday 18th November Aileen Buckton (executive director of Lewisham Community Services) agreed with Simon Raper (resident) that the Council should not have sent out such a misleading letter.

*How can this be a legitimate consultation when the consultees have been misled by the Council from the outset? We believe that this 'consultation' is already completely invalid and should be conducted again beginning with the Council sending out a letter to Lewisham residents apologising for the previous misinformation and telling them **the truth** about caravan widths / access.*

...when you respond to my email I would be very grateful if you would respond to the points I have made directly. I am not interested in knowing that my 'points have been noted'. I intend to pursue this issue."

No one has ever replied to these points.

3.12.11 I attended a meeting with 2 ladies from the travelling community, 4 other residents of Church Grove (Terry Edge, Simon Raper, Pete & Sue Scott-Cooksey), Steve Gough and Kplom Lotsu from Lewisham Council and chaired by Cllr Damien Egan. At that meeting Steve Gough told us that he would be getting an interim access report on 5.12.11 which he would present at the public meeting on 6.12.11. Residents asked him if they could see this report before or during the public meeting. He refused. Knowing that his presentation would be biased, we said we did not want him to present the report at the public meeting if he would not let us see it.

6.12.11 The final public meeting of the 'consultation'. The only new information residents could get out of Mr Gough was that his plans to suspend parking on Church Grove to get traveller mobile homes in would be virtually impossible to enforce because forcibly moving parked cars not belonging to Church

Grove residents would be illegal! Again Steve Gough refused to show the interim access report to residents. Again he admitted he had no idea about caravan widths or how caravans were going to access Church Grove. A *News Shopper* journalist quoted one of his answers in the newspaper, ***'the research we're having done will determine whether or not the information we've provided is correct.'***

Mr Gough appeared completely to miss the irony of what he had said. The Council should not be sending out essential public information that they only check on afterwards. In any case no independent report will support the view that the Council should have been sending out measurements for 'typical' caravan widths.

Furthermore it is completely wrong for a Council officer to refuse to share important public information with the public. Mr Gough was prepared to present his version of it publicly so there can be no appropriate reason for him not to have given it to us in its original form.

As I am writing, we believe Mr Gough has the final access report. We have a chain of emails showing local residents asking Steve Gough for this report so that we can comment on it as part of the consultation process. He has said we will only be shown it next month, days before the Mayor's meeting on 18th January when he will decide the future of the Watergate site. This will mean our comments only go into an appendix. They will not feed into the consultation itself or the officers main report to the Mayor. It also means that our concerns about access - detailed in Simon Raper's speech at the Mayor & Cabinet meeting on 6.10.11 - will not have been addressed as part of the consultation process despite the Mayor's specific request.

On the subject of the Council's traveller needs assessment conducted by *Local Dialogue* on which the Mayor based his decision to consult on Church Grove...

Mr Gough's consultation letter of 4.11.11 stated,

'Earlier this year an independent needs assessment recommended the provision of between four and nine pitches...to meet the current need of the borough's Traveller population.'

We have an email chain in which Simon Raper (a statistician accredited by the *Royal Society of Statisticians*) repeatedly asks *Local Dialogue* to provide a response to his proof that the need assessment was not only completely lacking in statistical robustness, it could not even be said to 'point to' a level of need. *Local Dialogue* refused to comment (unsurprisingly – very few research organisations would want to try to defend a piece of work based on an opportunity sample of 11), despite being asked by Simon to clarify the status of their findings to London Borough of Lewisham. They responded only by saying that they had forwarded his emails to LBL. Mr Raper will be making a formal complaint about the work of *Local Dialogue* to the *Market Research Society* which regulates research organisations. In summary we have repeatedly shown that the Council's traveller needs assessment is totally invalid and Council officers, copied into Mr Raper's emails, are aware of that fact. They have made no effort to conduct another needs assessment or apologise for the misleading information they sent out to the public.

On the subject of FOIs, we intend to complain to the *Information Commissioner's Office*. Over 8 weeks is a totally unacceptable length of time to wait for a Freedom of Information request.

We have concrete evidence to prove every one of the 8 specific complaints I have made here about Council officers and the invalidity of this consultation process. At the very least there must be another consultation. We will pursue this through our solicitors if necessary.

However, a better outcome would be for the Council to drop this proposal altogether. We will continue

to make legitimate demands that a new, properly conducted, statistically robust traveller needs assessment should occur. Lewisham's traveller community deserve this. This would necessitate a restart of the whole process beginning with a proper site search (as opposed to the most recent pin-the-tail-on-the-donkey affair conducted by planning officers) and leading into a proper consultation with the settled community as well as the traveller community.

I do not suppose much of my letter will be going into Council officers' report to the Mayor. I will also be sending it as part of a formal complaint to the Council and then, probably, on the Council Ombudsman.

Yours faithfully

Clare Brynley-Jones

David Hutchens
18 Church Grove, SE13 7UU

15.12.11

I have a number of objections, both to the 'consultation' and the proposal.

Your 'consultation' is a sham. How can a consultation on one option have any meaning?

Significantly, the decision to go to 'consultation' on a single option was done furtively, and residents only found out about the proposal via a local journalist. It is put to Church Grove residents that this was an unfortunate oversight (a common theme from the previous application when similar promises were routinely broken), but both council officers and councillors had undertaken to keep residents informed and one can only conclude that it suited Lewisham council to keep the project a secret from the Church Grove community as long as possible. It seems that members of the travelling community had been told about the proposal months before the settled community. This is clearly bad practice and against guidance that people from the affected settled community should be involved at the same stage as travellers.

One of the Lewisham Central councillors assured Church Grove residents that the process of site search and appraisal had been carried out by external consultants, in an unbiased fashion. He has since acknowledged that this is not the case, and that the process was handled by Council officers. I believe this was done in such a way as to minimize inconvenience for the Council, and with no real thought for the needs of either the settled community or the Traveller community.

Site search – a cut and paste job from the previous application with the decision to choose Church Grove already made on the basis of previous planning consent (given several years previously under very different circumstances, both in terms of travellers circumstances and relevant guidance/legislation).

Options appraisal – this is enough to make a cat laugh. It looks like this was done back to front i.e. having decided on Church Grove (on the basis of previous planning consent) the criteria and assessment was then tweaked to justify the decision already made.

Needs assessment carried out by Local Dialogue—given the feebleness of this survey and the tiny number of people engaged with, it is astonishing that such a document could be used as a basis for any significant decision making.

The letter sent by Steve Gough to local residents about the 'consultation' is based entirely on previous application and related surveys. Concerns raised by residents about access situation on many occasions were completely ignored and consequently misleading and inaccurate information has been circulated to the local community.

Looking back to 2007, when the travellers site was first proposed, it is striking how the terms of the council's presentation have shifted. Then, it was all about an identified community of Thurston Street residents who were being made homeless by Lewisham council as a result of the Gateway development. Church Grove residents who expressed any concerns about the proposal were routinely patronised by both council officers and councillors with statements about 'non-travelling travellers' who were a 'matriarchal community' and that everything would be fine because they never went anywhere; and people who challenged this were labelled racist and Nimby. Nevertheless, at the drop-ins it was routinely acknowledged that Church Grove was a far from ideal site—because of its location, access, flood plain etc—but that it would have to do because of the extreme urgency of the situation.

Having obtained planning permission, the Thurston Rd travellers then disappear with no explanation offered to the Church Grove community (rumours that money changed hands to give up licenses) and the planning consent is allowed to lapse.

Several years later the situation is very different: there are no travellers living outside of conventional housing in the Borough, and yet we find the same sense of desperate urgency in the process, with Church Grove being touted as the only possible solution etc. Mr Gough was questioned during one of the drop in sessions about the number of planning guidelines that are broken in the Church Grove plan. His answer was, 'They are just that—guidelines'. It had to be pointed out to him that the guidelines exist to prevent stupid decisions.

Given the council has a statutory obligation to 'respect the interests of the settled community' the 'consultation process' has served only to reinforce the widely held view that the Church Grove Travellers site proposal is 'lazy and stupid planning' and reflects badly on the council and its officers. By proposing a site that is completely unsuitable for traditional nomadic lifestyles the Council clearly does not have the interest of the Traveller community at heart.

Given that the Council informed Church Grove residents on more than one occasion that the previously granted planning permission would be allowed to lapse, it is surprising (to say the least) that the Council is asserting the right to make use of this previously granted permission now. I have heard it argued that Council officers were themselves ignorant of the legal situation and that they now believe they have an additional year in which this planning consent is valid. If this is true, it reflects poorly on the competence of everyone involved. And given the time that has elapsed since planning consent was given and the very different circumstances that now pertain, the original plan is now hopelessly out of date and surely cannot be used. If the Council tries, I would have thought a legal challenge is certain to follow.

Throughout the consultation local residents have outlined clearly the very many reasons that Church Grove is not suitable as a location for a travellers' site.

- There is only one point of access into and out of the site. This creates safety concerns and potential friction and conflict between the traveller and settled community both of which have to share the same tiny road.
- Access down Church Grove (a narrow single lane cul de sac) is not wide enough for lorries, fire engines or caravans to drive down without mounting the pavement.
- It is on a flood plain next to the river Ravensbourne,
- No one currently living in Church Grove can take out new buildings insurance, due to perceived flood risk. Travellers are unlikely to be able to insure their homes.
- It suffers noise pollution from the railway line and Council depot opposite
- It is contaminated with toxic cadmium and other heavy metals
- It is simply too small. Previously Lewisham was required to provide 16 pitches and so it cannot now hide behind an inadequate needs assessment to claim that five pitches between 490 travellers in the borough is sufficient.
- It immediately abuts a conservation area.

You will find a much more detailed and coherent account of the Church Grove community's concerns and objections in Mr Terry Edge's response, which you will have already received.

Finally, I would like to draw your attention to the submission from the Ladywell Village Improvement Group, for an independent perspective on this whole sorry mess:

The Council has behaved in a high-handed manner and all recent evidence suggests it is set on ignoring local concerns. The Council's apparent determination to push through this proposal highlights a lack of a strategic vision for the neighbourhood and LVIG invites the Council to embark on a broad, more meaningful consultation with residents about the future of the Ladywell area.

Quite.

8 Church Grove
Lewisham
London
SE13 7UU
Friday 16th December 2011

Dear London Borough of Lewisham,

I object to the proposal for a traveller site on the old Watergate school site, Church Grove on the following grounds:

1. The previously granted planning permission is no longer appropriate or relevant.
2. Planning permission was 'withdrawn' from the Council's planning website then re-entered as 'granted'. This was misleading and illegal.
3. The decision to consult on Church Grove was based on an independent traveller needs assessment. We have shown that no inferences can be made from this inadequate study. No need for a traveller site in Lewisham has been proved.
4. Church Grove is completely unfit for the purpose of access to a traveller site.
5. Though unsuitable as a traveller site, the Watergate site is suitable for many other purposes such as education or sheltered housing (which, unlike a traveller site, the Council has a statutory obligation to provide)
6. Placing a travellers site such an inappropriate place inflates the cost of the site and thus ends up delivering far less value for money

I also believe that Lewisham Council officers' conduct during the consultation has been appalling and the entire consultation process was entirely inadequate. During the so-called 'consultation' Council officers:

1. Failed to keep Church Grove residents informed of developments relating to the Watergate site despite spoken and written assurances that they would do so.
2. Posted and gave out written information to all consultees that was incorrect and misleading.
3. Then continued to give out this information to the public despite residents' complaints.
4. Ignored the Mayor's request [minuted 6.10.11] that residents' concerns about access and the traveller needs assessment be properly addressed. At the time of writing they have not been addressed by the Council at all.
5. Persistently ignored important questions (both spoken and in writing) from residents relating to safety issues, access, the validity of the traveller needs assessment (on which the Mayor had based his decision to consult) etc
6. Admitted that their ill-thought-out plan involved breaking the law on two counts.
7. Withheld key documents about access from residents throughout the consultation process without giving them any reason for doing so.
8. I have two Freedom of Information Act requests relating to the consultation that are now more than four weeks overdue (that's four weeks after the 20 days allowed). I have been forced to complain to the Information Commissioner.

To remedy the situation a new traveller needs assessment should be conducted and the consultation should be run again. Also members of the public who were given incorrect, misleading information should receive an apology from the Council along with the correct information.

Irwin Mitchell solicitors, representing Church Grove residents, agree that this consultation is completely invalid and should be run again.

The information below used by residents in their correspondence about caravan widths etc is

supported in an independent report conducted by *Sanderson Highway Consultants*. Residents' concerns about Church Grove being totally inadequate to give access to a traveller site is also completely upheld and supported in an independent report by *Boyer Planning Consultants*.

BACKGROUND

13.2.09 Following the granting of planning permission for a traveller site on the old Watergate site at the end of Church Grove and a subsequent legal battle between the Council and Church Grove residents - 3 residents (Clare Brynley-Jones, Terry Edge & Kim Horwood) attended a breakfast meeting with Councillor Andrew Milton, Heidi Alexander (Deputy Mayor & Cabinet Member for Regeneration), Malcolm Smith (Executive Director for Regeneration). The general content of the meeting was subsequently summarised in an email to me from Heidi Alexander. She ended her email,

'...at the meeting this morning we did agree that the council would keep resident representatives updated as the site search progresses.'

30.11.10 Church Grove residents received a letter from Steve Gough (Director of Lewisham's Programme Management) saying,

"I would confirm that the Council is not intending to implement or make an application to extend the existing planning permission for the Church Grove site between now and 3rd April 2011. This means that the existing planning permission will expire on 3rd April 2011."

THE 'CONSULTATION'

4.10.11 - a local newspaper reporter told Church Grove residents that the Mayor was to look at Church Grove being consulted on again as the only proposed site for travellers. Despite assurances from Malcolm Smith & Heidi Alexander (above) that we would be kept informed this was the first we had heard on this subject since our breakfast meeting.

6.10.11 - I was allowed to speak for 2 minutes at the Mayor and Cabinet meeting on behalf of Church Grove residents. The main concerns I raised were about inadequate access for traveller vehicles up Church Grove (the only access to the Watergate site) and, as a statistician, I vehemently questioned the validity of the Council's traveller needs assessment. Although he agreed to another consultation for the Watergate site, the Mayor acknowledged residents' concerns saying he wanted the issues of access and the validity of the needs assessment addressed and he would be prepared to extend the consultation process to do that if necessary.

5.11.11 Church Grove residents received a letter from Steve Gough saying, *"...planning permission for the Church Grove site is still capable of being implemented until 3 April 2012."* and demonstrating that the Council was intending to implement it. [directly contradicting his previous letter to residents 30.11.10 quoted above]. Despite previous assurances from Malcolm Smith & Heidi Alexander [quoted above] that residents would be kept informed of the site search processes the first information local residents got from the Council was this letter – the start of formal consultation with the Watergate site as the *only* site option. The letter told us there had been a site search, *'undertaken earlier this year [which] resulted in a shortlist of seven sites [from which] Council officers recommended Church Grove as the preferred site.'* This letter also particularly angered residents because it totally dismissed their concerns about the two issues the Mayor had said should be addressed - access and the needs assessment.

9.11.11 Clare Brynley-Jones wrote an email to the Mayor reminding him of his public request at the Mayor & Cabinet meeting (5.10.11) that residents' concerns about the needs assessment and access be properly addressed and that he said he would be prepared to extend the consultation period in order to do this. She told him that in fact his words had,

...“been completely ignored by council officers. On 5th November residents received a letter about the 'consultation' on Church Grove. It dismisses both issues. It says that access was 'previously dealt with in the last planning permission'. On needs assessment we are just told that, 'an independent assessment [was] undertaken in 2011' and that Church Grove is 'being recommended as the preferred site to meet the current need'. Simon Raper was also told in an email dated 4th November that a '6 week consultation period is perfectly adequate'. So firstly I would like to ask that you insist on your requests being addressed.

The consequence of your requests being ignored is that the entire community is now being deliberately misled by the Council's consultation letter.

Eg regarding caravan width: the letter claims that 'touring caravans are 2.2m wide'. You know how relevant this is because the useable access width of Church Grove is 2.6m. The Department for Transport; the National Caravan Council and every other expert organisation we have spoken to say that touring caravans are frequently 2.55m wide (some of the supporting documents are on our website www.savechurchgrove.com). This fact has been brought to the attention of the Council officers in writing and in Simon's speech. So my second request is that you will now take action to address the 'misinformation' that has been circulated to the local residents of Ladywell.”

12.11.11 The misleading, incorrect information was still being handed out to the public at the Council-run 'consultation' drop-in. We have a video recording of Steve Gough admitting that he still had no idea how wide caravans are or how they were going to get up Church Grove. On the same video there is footage of angry residents telling Steve Gough that the information he sent out was wrong and asking what he is going to do to set things right.

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23.11.11 The Mayor visited Church Grove. Again he voiced his concerns about access. Again residents said how angry they were that incorrect, misleading information was still being given out to the public. Finally Steve Gough apologised for this misleading information being given out and said that it would not be given out at the drop-in the next day. It wasn't but local people have never been apologised to or sent out correct information.

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As this letter shows, we have concrete evidence to prove every one of the 7 specific complaints I have made here about Council officers and the consultation process. We will pursue this through our solicitors if necessary.

Regards

Simon Raper

Whilst travellers have some rights to a site, I think that Church Grove is unfeasible because of health and safety risks to Travellers and residents of Church Grove. I refer you to the web site www.savechurchgrove.com for details of these risks. Please consider all the information on this web site as reflective of my own person views. This means that I do not have to waste more time repeating what I have said many times before or cutting and pasting from the web site.

Without going into the technicalities - these are available on the web site however - I consider the way that Church Grove residents have been treated by the Council both last time this site was proposed and this time, to be appalling. I am a local resident and my health has suffered as a direct consequence of the stress that this has brought about both last time and now again this time. It is important that this is taken into account along with the destruction of the local community that it has caused. I feel that residents of the street were literally just starting to recover from the previous proposal and beginning to organise social events together - something that had completely stopped, when we heard from a reporter that it was all on again and that there was a Mayor and Cabinet meeting in 2 days time. Since then (in October) - residents in the street have had to fight against what we believe to be completely wrong. This has been time-consuming to say the least and hugely stressful. Residents have jobs and other responsibilities they have to focus on. Residents are not immune to other stresses - such as redundancy, serious physical ill-health and stress-related conditions - all of which are going on at the same time and are worsened by the appalling lack of respect the Council have shown us. Some examples of this are (in no particular order);

Council staff making suggestions of racism and "nimbyism" to individuals (especially during the last consultation),

not sticking to promises made e.g. that Church Grove would not be considered again for a Travellers site and we would be informed if there was any change to this,

taking away our parking bays just before the new consultation started and delaying on re-painting them. Once repainted, we discover that are clearly narrower than previously - very underhand. Not only that, when re-painting, we were not notified in advance by any means and a crane was sent along to lift each car up to paint around it, without owners' permission. Never mind a lack of respect, is this even legal?

An indifferent response to the fact that residents have pointed out that inaccurate information has been used to justify the whole proposal and consultation - especially regarding the widths of caravans and mobile homes used by travellers now and in the future - no apology and no amended letters sent out.

Not meeting a simple request made by residents to move the public meeting as it clashed with another local meeting - (Ladywell Assembly) which prevented residents from attending the second meeting and others from attending the public meeting. - this has been acknowledged now by Damian Egan, but as there seems no justifiable reason not to have changed the meeting time in the first place, this is another example of the lack of respect towards us.

It would seem that the day after the public meeting - where local residents and everyone else present were in opposition to the idea and was obviously very stressful for local residents - Damian chose to show the Traveller Liaison Officer around the street. This beggar's belief - can it not be appreciated just how stressful this is for local residents? As I understand, he did not contact anyone in advance about this - which is strange as there has been a lot of liaison about other arrangements. It shows a massive lack of sensitivity in my

view - we are local people who vote and expect our Councillors to support us as local citizens.

Information has not been openly shared with us. There is a lack of transparency. Responses to Freedom of information requests are delayed. Steve Gough is not prepared to share the draft Access report with us - even to the extent of indicating the conclusion of it - presumably the main findings and conclusion are not going to significantly change between draft and final version? This just adds to the stress experienced by local residents.

we have felt insulted by the lack of common sense, the very poor statistical justifications and the inept reasoning that has been applied to this whole issue. Why on earth was access to the site not considered before carrying out (a very inadequate) options-appraisal on potential sites - as, if access is not feasible then all the other criteria applied are invalid. But no, an (inadequate) options- appraisal is carried out first and lo and behold Church Grove gets full marks! This then rules out all other options and the consultation process is applied only to Church Grove. Oh and then it is thought useful to carry out an Access assessment to see if caravans and mobile homes can fit down the street -insulting and again hugely stressful for residents.

The recommendation of a previous independent Consultant, of Lawrence House car park being the preferred option, was declined by Lewisham Council. We were informed it was because the Travellers did not want to go there. It is insulting to us, as human beings, that their views can so easily alter the final decision; going against the recommendation of an expert paid for by tax payer's money, yet our views seems to count for nothing.

Residents were encouraged by the Council, following the turn-around the last time this was going ahead (i.e. Travellers suddenly decided they wanted to be housed instead) - to pursue their idea of a temporary Community Garden on the site, to the extent of carrying out a lot of preparatory work and gaining written support from local primary, local secondary schools and local nursery, stating that they would be able to put the garden to great use in the school curriculum. The Council then at the last minute pulled the plug on this, without a proper explanation. (It has never been clear what prompted the Travellers to change their minds about wanting a site and preferring housing – we had wondered if they were given a financial incentive, which might explain the change).

The fact that Church Grove is a key part of St. Mary's Conservation Area, seems to count for nothing. On the one hand, the Council produce a lovely glossy brochure about it and impose specific requirements on the home owners of the mid 1800's 2 bed cottages that we must comply with; then on the other hand are happy for the very narrow street to become the driveway for mobile homes, travelling caravans and large vehicles for the Travellers site - ridiculous!

There has been some suggestion that the parking bays in the street may be removed if necessary – yet another example of the lack of respect towards local residents. It is not even clear if doing that will mean the road is wide enough for mobile homes anyway. If it was, then local residents lose parking (paid for by annual permit) to allow for mobile homes, caravans and large cars/vans belonging to Travellers – our parking would be taken away to allow access for the Travellers' to park their vehicles in their dedicated spot which will be provided for them!

I could go on and on and on - it is a disgrace and this whole process should stop and be replaced by something much more robust and unbiased. An independent Consultant should be brought in to do this, not answerable to Lewisham Council. This has all been a shocking waste of time and tax payers' money. I am sure the Press (in its many forms) will be very

interested in these points. I believe you are meant to be taking into account the views, needs and welfare of local residents in such a plan.

In respect of other potential sites – I think the one's put forward should be looked at again using a better set of criteria and using a more sophisticated approach where Access is fundamental to process. I think that access should be looked at, not only on what current caravan/mobile home widths are but also taking into account future trends for larger vehicles – as all vehicles are getting bigger not smaller. My knowledge of local sites is limited to what is publicly known so it is difficult to comment on specific sites. I suggest an independent review of the sites by someone not answerable to the Council, to ascertain the specific merits and constraints of the various sites.

I trust I have made my views clear.

15th December 2011

Our Ref: NJG/PP/11.179

Mr S. Gough
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Regeneration & Asset Management Division
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Dear Mr Gough,

Re: Consultation on Proposed Gypsy & Traveller Site in Church Grove, Ladywell

We refer to your letter to residents dated 4th November 2011.

Boyer Planning was appointed by the Residents of Church Grove, Ladywell to prepare representations in respect of the planning issues arising from the proposed gypsy and traveller site. As you are aware, the residents are opposed to this scheme, and from our assessment we believe that there are sound planning reasons as to why this is not an appropriate site for a gypsy and traveller use. We have set out our comments in the attached document, which we have submitted electronically to your email address.

We would be grateful for acknowledgement of receipt of the representations.

Yours sincerely,



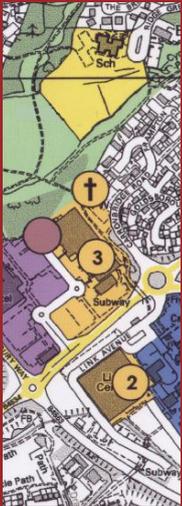
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**LEWISHAM: CONSULTATION ON PROPOSED
GYPSY AND TRAVELLER SITE,
IN CHURCH GROVE, LADYWELL**

**REPRESENTATIONS ON BEHALF OF
CHURCH GROVE RESIDENTS**

December 2011
11.179

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SECTION ONE – INTRODUCTION AND EXECUTIVE SUMMARY

- 1.1 Lewisham Council is conducting a consultation exercise with regards to the allocation of the former Watergate school site on Church Grove for a five pitch Gypsy and Travellers site. Boyer Planning has been instructed to make representations on behalf of residents of Church Grove with regards the Council's proposal.
- 1.2 The replacement London Plan published in July 2011 no longer sets targets for the provision of Gypsy and Traveller pitches. The amount of provision is up to the discretion of the Borough.
- 1.3 Government policy seeks to ensure fair and equal treatment of Travellers, in a way that supports the traditional and nomadic way of life of Travellers "*while respecting the interests of the settled community*". This latter point is an important factor in our approach to the representations on your behalf.
- 1.4 Government guidance also states that a credible evidence base requires statistically significant results. The sample used by Council is statistically too small to be of any value. The assessment also raises the question of whether there is a need to provide Gypsy /Traveller sites or a greater need to provide more accessible social housing for the Gypsy /Traveller population.
- 1.5 There is now no pre-existing Gypsy /Traveller community in Lewisham that needs an immediate new site, which was the reason why the Church Grove site was first chosen as a Gypsy /Traveller site. It was intended to house Travellers from an existing authorised site at Thurston Road which was to be redeveloped. In the end the Church Grove site was not needed for its intended use.
- 1.6 In our opinion the Council has not properly assessed the implications for access to the site. In our submission the road, with parked cars, is totally inadequate for the intended purpose. In addition to the amenity implications for trailers with large caravans passing residents' homes, there is the high risk that such an activity may result in damage to residents' cars, parked legally on the road.
- 1.7 We also consider that the scoring in relation to the seven potential sites investigated by the Council has not been properly applied. The existence of an



extant planning consent (albeit one that expires in the very near future) should not be afforded great weight, and the access problems should be afforded far greater weight, in respect of the Church Grove site.

1.8 We also consider that, as the proposed travellers' site requires access via Church Grove which is part of St Mary's Conservation Area, the Council has not properly considered central government and local policy in respect of "*preserving or enhancing the character and appearance of a conservation area*".

1.9 It is considered that the Church Grove site should not be chosen as a site for Gypsy and Traveller families.



SECTION TWO – PLANNING POLICY BACKGROUND

2.1 Planning for Traveller sites

2.1.1 As part of the National Planning Policy Framework process, the Government has consulted on revised planning policy advice for “Planning for Traveller sites”. The consultation closed on 6th July 2011. This is with a view to superseding the existing advice, in particular that contained within Circular 01/2006. The Government considers that this is outdated due to its broader changes to the planning system. In particular the DCLG has cited its desire for more local decision-making. The draft policy wants to ensure fair and equal treatment of Travellers, in a way that supports the traditional and nomadic way of life of Travellers “while respecting the interests of the settled community”. This latter point is an important factor in our approach to the representations on your behalf.

2.1.2 As things stand, the approved policy is Circular 01/2006. We note that the approved policy however includes the above approach. Paragraph 12, intention (d), states:

“To recognise, protect and facilitate the traditional travelling way of life of Gypsies and Travellers, whilst respecting the interests of the settled community.”

(our emphasis)

2.1.3 It is also important, as noted at Clause (e) of paragraph 12, that needs are assessed at regional and sub - regional level and for local authorities to develop strategies to ensure that needs are dealt with fairly and effectively.

2.1.4 Taking the above approach, it is for the local authority to identify specific site allocations through its LDF process. We note that the current consultation purports to be part of this process. The consultation refers to a shortlist of seven sites being considered by Council, and we refer to these in more detail in Section Five.

2.1.5 In this connection it is relevant to note the DCLG guidance document, “Gypsy and Traveller Accommodation Needs Assessments”. This stresses the importance of



having a credible evidence base if there is a prospect of a judicial review.

Paragraph 51 states:-

“In the event of challenge or judicial review during the LDF process or planning appeals, it is essential for a planning inspector to have access to a properly conducted assessment of Gypsy and Traveller accommodation needs, and a clear picture of the basis on which the local authority is intending to address it. This will help to ensure that the local authority's actions and decisions are defensible in the circumstances otherwise there is a risk that appeals could be lost simply on the grounds of insufficient evidence or a lack of demonstrable effort in providing suitable authorised site accommodation elsewhere.”

2.1.6 The above guidance makes it clear that a credible evidence base requires statistically significant results. Paragraph 73 states that the survey should be conducted on a statistically representative proportion of the Gypsy and Traveller community. Paragraph 74 goes on to note where larger or more widespread Gypsy and Traveller communities are concerned it will be necessary to strike a more realistic balance between coverage and economy of scale. We address the issue of need in the following section.

2.1.7 Turning to Lewisham's recently adopted Core Strategy (CS), CS Policy 2 refers to Gypsies and Travellers, and specifically to the process of identifying suitable sites. It states that a site will be identified through the Site Allocations DPD. It goes on to note that proposals for additional and alternative Gypsy and Traveller sites will be assessed having regard to six criteria. Of these we consider that the following are directly relevant to Church Grove:-

b. They are safe and have reasonably convenient access to the road network.

c. They have provision for parking, turning, service and emergency vehicles.

f. They are designed and landscaped to a high standard which facilitate the integration of the site with the surrounding environment and amenity of the occupiers adjoining the site.



2.1.8 For the reasons which we set out in this statement we consider that the site does not have a safe and convenient access to the road network, it has inadequate arrangements for turning, service and emergency vehicles and is not designed, therefore, in such a way that allows for its proper integration with the surrounding community, as it would adversely affect the amenities of occupiers of properties adjoining the site. It fails to comply with CS policy 2.

2.2 Conservation Area Policy

2.2.1 *Planning Policy Statement 5: Planning for the Historic Environment, 2010.* PPS5 sets out the Government's objectives in relation to the protection of the historic environment. The Government considers that "*planning has a central role to play in conserving our heritage assets and utilising the historic environment in creating sustainable places*" (Para. 6). Although the PPS generally applies to more substantial historic assets which are of national or regional interest, the approach taken is also applicable to smaller schemes.

2.2.2 The Government's objectives for planning in relation to the historic environment include ensuring that "*decisions are based on the nature, extent and level of the significance of heritage assets, investigated to a degree proportionate to the importance of the heritage asset*" (Para. 7). As a result the importance given to the impact of the development on the heritage asset should be proportionate to the scale of the impact. The accompanying Practice Guide provides further advice on this matter.

2.2.3 In respect of Conservation Areas, the advice in PPS5 is set in the context of the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 72, subsection 1 states:-

"In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."



2.2.4 *The London Plan, 2004 (consolidated with alterations February 2008)*. Although The London Plan is a strategic document, there are a number of policies which can be considered relevant.

2.2.5 *Policy 4B.11: London's Built Heritage* seeks to ensure that the historic environment of London is both protected and enhanced. The policy therefore recognises that the historic environment is not a static feature and changes to it can help to enhance its character.

2.2.6 *Policy 4B.12: Heritage Conservation* states that Boroughs should,

“ensure that the protection and enhancement of historic assets in London are based on an understanding of their special character, and form part of the wider design and urban improvement agenda, including their relationship to adjoining areas, and that policies recognise the multi-cultural nature of heritage issues.”

2.2.7 The policy therefore highlights that an understanding is needed of the particular elements which are key to the special character of the area. It is these elements which require protection to ensure that the character of the area is enhanced and preserved.

2.2.8 *Lewisham Core Strategy*. Policy 16 seeks to ensure that the value and significance of conservation areas will continue to be monitored, reviewed, enhanced and conserved according to the requirements of government planning policy guidance, the London Plan policies, local policy and English Heritage best practice.

2.2.9 *Proposed Travellers Site, Ladywell, Lewisham - Conservation Area Assessment, November, 2007*. In the summary, para 2.16 states:-

“From the above the national, regional and local policy and guidance it is clear that a proposal for the Former Watergate School site will need to demonstrate that it preserves or enhances the setting of the St Mary's Conservation Area, in particular its character and appearance along Church Grove.”



SECTION THREE – NEED

- 3.1** Lewisham Council commissioned Local Dialogue to prepare a needs assessment for the provision of Gypsy and Traveller sites.
- 3.2** The report accepts that it is difficult to establish the need for Gypsy and Traveller pitches in Lewisham. It is estimated by the Council that there are approximately 100 Traveller families (around 500 individuals) in the Borough. Local Dialogue was only able to gather 11 returns to its needs survey. This sample is statistically too small to be of any value, but notwithstanding this point, Local Dialogue confirmed that, even though within the sample group there was a perceived high demand for the provision of pitches within the Borough, demand is not the same as need.
- 3.3** It should be noted that only two of the respondent group lived in social housing. The rest of the sample group, apart from one individual, were living in private rented accommodation. It could be equally concluded from the report that the demand for pitches was due to the lack of good quality private rented accommodation and the lack of social housing. Therefore the question that has to be asked is whether there is a need to provide Gypsy /Traveller sites or is there a greater need to provide more accessible social housing for the Gypsy /Traveller population.
- 3.4** The Local Dialogue report confirms that there are no particular problems in Lewisham from unauthorised encampments. Therefore it can be argued that there is no need to provide a Gypsy /Traveller site to overcome a specific problem such as high levels of unauthorised encampments. From the same report it can be questioned whether there is any need for pitches generated by the resident Gypsy /Traveller population.
- 3.5** It is not clear from the consultation document which part of the Gypsy /Traveller community the site is meant to cater for. Is it for the resident population, which now lives in bricks and mortar or the transient population? There is now no pre-existing Gypsy /Traveller community in Lewisham that needs an immediate new site, which was the reason why the Church Grove site was first chosen as a Gypsy /Traveller site. It was intended to house Travellers from an existing authorised site at Thurston



Road which was to be redeveloped. In the end the Church Grove site was not needed for its intended use.

- 3.6** There appears to be little evidence of a need for the existing population to find pitches, and the only conclusion is that the site is intended for the transient population. If this is the case this will result in considerable harm to the well-being of the residents of Church Grove due to the inappropriate access facilities to the site. We elaborate on this issue in the next section.



SECTION FOUR - ACCESS

- 4.1** There are two matters for consideration in relation to the access that is proposed to the site. Firstly, there is the issue of amenity to residents and potential damage to vehicles. Secondly, the siting of caravans on the edge of St Mary's Conservation Area, together with the passage of those caravans through the Conservation Area, does not meet the tests of preserving or enhancing the character and appearance of a conservation area.
- 4.2** Church Grove is a narrow cul de sac. The Council claims that it is 4.6m wide but residents have measured it to discover that it is in fact 4.56m wide.
- 4.3** It was argued, by the Council, during the determination of the last application of the former school site for a 5 pitch Gypsy /Traveller site, that traveller's touring caravans are only 2.2m in width. Therefore even if the access road is only 4.6m wide, and taking into account parked cars on the street, located in official parking areas nominally 2m wide, the Council considered that the 0.4m clearance would be sufficient for the safe passage of caravans along the street. Unfortunately there is no margin of error. It is understood that the widths of a continental style caravan, as often favoured by Gypsy and Traveller communities, are 2.44m and 2.55m. If the road is 4.6m wide, as the Council claims, this will only allow a 2.05m wide space for parked cars leaving a margin of error of only 5cm. If the road is only 4.56m wide the margin of error is reduced to 1cm. The problem would be compounded in poor weather conditions where vehicles may slip in the wet, snow and ice which would potentially exaggerate the "sway" of a caravan if a towing vehicle has to brake suddenly or correct a skid.
- 4.4** The above calculations do not however take into account the need for vehicles towing caravans to have wing mirrors which project a minimum of 250mm on either side, bringing the total width to 3.05m (bearing in mind that the law requires that lorries/trucks must pull caravans over 7m in length). In addition, the Council has failed to take into account the fact that UK law changed in 2010, to bring it in line with EU law. Before, in the UK, cars could pull caravans only up to 2.3m width; now, cars can pull caravans up to 2.55m width (as said, however, if over 7m in length - as many travellers prefer - a lorry/truck is required). It is relatively easy for UK



citizens to buy new and second-hand continental caravans so, clearly, the number of wider caravans in the UK is going to continue to increase, making it even more likely they will want to access the Church Grove site.

- 4.5** The Council claims that if there is a need for caravans which are more akin to mobile homes, which are approximately 3m wide, to be manoeuvred along Church Grove, then temporary orders would need to be served. This would be in order to stop cars parking on Church Grove, whilst the caravan is being moved into place, to allow for the transportation of the mobile home to be carried out safely and without damaging parked cars.
- 4.6** This seems a wholly disadvantageous position for local residents, given the potentially transient nature of the occupants of the site and therefore the likelihood that caravans will need to access and egress the site on a regular basis. Should the proposed Gypsy /Traveller site be in any part used for the transient Gypsy /Traveller community then there is a greater potential for conflict between the resident population and the Traveller community due to the restricted access on Church Grove. The Council has acknowledged the difficulty of contacting every owner of a parked car in Church Grove - given that the parking zone in effect there covers many other surrounding streets - and suggest it would have to use a crane to remove some. The problem for the Council in contacting owners is compounded by the fact that not every car parking on Church Grove is owned by a resident or by someone visiting a resident. The Council has also acknowledged that the removal of cars is an illegal act. Clearly, the Council cannot propose a solution to a regularly occurring problem that requires it to break the law to enact.
- 4.7** Regarding touring caravans, it would be unrealistic to expect a transient Traveller to wait until traffic orders are in place to remove parked cars from the road should their caravan be marginally wider than the usable carriageway width. For ease they are likely to attempt to manoeuvre the caravan, with the risk that such an activity may result in damage to residents' cars, parked legally on the road. This would therefore have legal implications between, not only the Travellers and residents, but also between residents and the Council, and Travellers and the Council, as it would be as a direct result of the Council's actions as owner of the site as well as Local Planning Authority that the Traveller site is located at Church Grove. Should



residents' cars and property be damaged as a result of the inadequate access to the site, the Council would potentially be equally liable.

- 4.8** In relation to the policy requirement to preserve or enhance the character and appearance of the St Mary's Conservation area, we note that the Conservation Area Assessment (November 2007) of the site concluded that this test was met. The study was undertaken by consultants on behalf of the Council. Their conclusion is their opinion.
- 4.9** In Section 6 of the Conservation Area Assessment and throughout the document, emphasis is placed on the comparison between the former school buildings (which existed at the time of the report) and the proposed development. The position has now changed, in so much as the school buildings have been removed. We therefore urge the Council to commission a further study to ensure that an up-to-date Conservation Area Assessment is made in respect of current circumstances before making a decision, in any event, about the appropriateness of the site.
- 4.10** We also note that an application for Conservation Area Consent was submitted in November 2007 for the demolition of part of the boundary wall and gates fronting Church Grove on the site of the former Watergate School (Ref.:07/67611). This was not determined as it was withdrawn by the applicants. It is further evidence, however, of the potential impact of the proposals on the Conservation Area and the residents would clearly wish to be closely involved in any future application for the demolition of the wall.



SECTION FIVE – REVIEW OF THE SEVEN POTENTIAL SITES

- 5.1** Of the seven sites which were short listed for further consideration for the Gypsy and Traveller site in Lewisham, The Laurence House Lorry Park at Canadian Avenue was historically considered more appropriate as a Gypsy/ Traveller site. We disagree with the Council's assessment of the Laurence House Lorry Park and Greenvale School (Perry Rise) sites. The Council has put too much weighting on these sites with respect to alternative corporate uses and planning constraints compared to the Church Grove site. The primary reason why Church Grove scores better than the other sites in terms of planning constraints is because there is an extant consent on the site for a Gypsy/Traveller site. However, as discussed above, the access to the site is not fit for purpose and as a result due weight should be given to this fact in terms of the scoring for planning constraints.
- 5.2** It is argued that Church Grove has been selected ahead of the other shortlisted sites in terms of alternative corporate use because it has a lower financial value to the Council than the other sites. It can be argued that because the Council considers that it has a problem with respect to providing a Gypsy /Traveller site it has chosen a site which has least financial value to it rather than making a proper planning decision having regard to the effect the proposal will have on the amenities of neighbouring residents.
- 5.3** The site could be considered for housing which could include an element of affordable housing and assist the Council in fulfilling its statutory duty to provide sheltered housing for the elderly. This would help to meet the needs of the wider community as well as the Gypsy/Traveller community, which, from the Council's own research, has indicated that one of the demand reasons for having a gipsy /Traveller site is the poor quality of the private rented accommodation they have to occupy and the lack of access to social housing.



15 December 2011

Mr Terry Edge
9 Church Grove
Lewisham
London
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david.colley@sandersonassociates.co.uk

Our ref :6450/DJC/002

Dear Terry

Re: Proposed Travellers Site Church Grove Lewisham

I refer to our recent discussions with respect to the above proposal and would now formally set out our findings so that you can relay these to the Local Planning Authority as part of your objections to this proposal.

We have examined the suitability of Church Grove from a technical perspective to accommodate the type and size of vehicles that are likely to be generated by the proposed development and how this may impact on the daily operation of Church Grove and Ladywell Road, the classified road B236, in terms of highway safety.

It should first be acknowledged that although the proposed site was formally occupied by a special needs educational unit, this unit has been demolished and as such the site does not generate any traffic and is very unlikely to do so in its current state under its lawful planning use.

With this in mind all traffic associated with the proposed development will be new to Church Grove and no netting off of its impact against an operational lawful use should be considered.

Church Grove is narrow for a traditional estate road (comprising of a carriageway and two footways) where to accommodate the two way passage of traffic (a service vehicle and a private car) a width of 4.8m is normally required. This standard is drawn from Manual for Streets which is the latest national guidance on street design and the appropriate extract is attached. Church Grove has no formal turning facility at its end. I understand that the Council have indicated that the carriageway width is 4.6m and from your measurements it is 4.56m with the footway on the western side being 0.94m wide.

In addition this situation is aggravated by the lack of off street parking arrangements for residents and their visitors to existing dwellings whereby both are required in the main to park on street. These difficulties are acknowledged by the Local Highway Authority as a Traffic Regulation Order is in place which limits on-street parking to part of the eastern side of Church Grove with restrictions on both sides around its head to ensure that access into the development site and some semblance of turning facilities are maintained. The marked width of the parking bay area is 1.8m and many cars are wider than this.

Given this situation it is likely that a vehicle associated with the development, which from experience tend to be light rigid trucks or large vans, would potentially overrun the western footway to gain entry or exit. Any slight miss parking of vehicles on the relatively narrow width of the carriageway of Church Grove could seriously increase this potential which will be to the obvious detriment of pedestrians, especially children, on the western footway. I am advised that some of the residents of Church Grove own 4 x 4 vehicles which, as expected, are wider than a "standard car" and that including wing mirrors these vehicles can be 2.2m wide. This would leave between 2.36m to 2.4m available between the widest vehicle and opposite kerb line assuming it is parked as close to the kerb as possible. If potential damage to these vehicles is to be avoided their owners may attempt through necessity to park them part on the eastern footway of Church Grove to the detriment of pedestrian movement, especially where prams, push chairs or wheel chairs are used.

Sanderson Associates have produced highway evidence at public inquiries into the refusal of planning permission for Traveller's and Travelling Show Person's sites and evidence has been accepted by the Planning Inspectorate of the level of daily traffic that is likely to be generated by a "pitch".

Evidence accepted by consultant's representing Travellers at a recent public inquiry, Inspectorate reference APP/M2325/C/10/2134060-74 and APP/M2325/A/2134042 was that from figures drawn from the TRICS database system (the industry standard for assessment) a level of 10 trips per pitch was to be expected in a 24 hour period. This level of use is higher than that of a normal dwelling which is in the order of 8 trips and lower, per house per day. As such the 5 proposed pitches would generate 50 vehicle movements per day, all of which traffic would be new to Church Grove. The proposals for the development site show 5 pitches with a 9m x 3.5m space for a "static" mobile home in addition to a space for a "touring" caravan. Some typical sizes of touring caravans by Hobby are shown on the attached sheet which can be up to 2.5m wide. It should be noted that those over 7m in length should be towed by a vehicle over 3.5t in weight. As indicated previously the available width between parked cars could be as low as 2.4m passing a 4x4 type vehicle or for a smaller family car such as a Vauxhall Astra this could be typically 2.56m to 2.6m which at best is only 50mm either side of a 2.5m wide caravan and does not take into account wing mirrors on the towing vehicle.

Vehicle movements into the proposed Travellers site would be composed of vehicles delivering to the static homes, vehicles towing the travelling caravans and the daily movements of the traveller's vehicles to and from the site when they are "settled". As stated previously experience is that this final series of movements tends to be of vehicles which are used in connection with the travellers trades and primarily are not private cars.

With regard to the ability of Travellers vehicles to access Church Grove from Ladywell Road, we have undertaken swept path analysis of vehicle combinations and have examined both the tracking generated by a rigid hgv truck and a 4 x 4 type vehicle towing a 2.5m wide twin axle caravan. Movements both into and from Church Grove from Ladywell Road have been considered. The attached sketches 1 to 4 show the swept path of a 4 x 4 type vehicle towing a twin axle caravan entering and leaving Church Grove, sketches 9 to 12 show the swept path of a longer twin axle caravan (9.49m including tow bar) towed by a 7.5t lorry and sketches 13 and 14 show the same vehicle entering and leaving the development site. It

should be noted that this vehicle combination when leaving the site would be obstructed by a car parked in front of number 6 adjacent to the existing kerb build out. In addition sketches 5 and 6 show a large rigid 10m long entering and leaving Church Grove.

Ladywell Road forms part of the classified road B236 and acts as a local distributor road carrying what would reasonably be assumed significant volumes of traffic through the day. As such it is particularly important to protect its function in the hierarchy of road types and as such the ability of vehicles to safely and conveniently leave and enter the B236 from side roads and access points must be considered.

The carriageway of Church Grove enters Ladywell Road at the same general width as that set out above and junction kerb radii are small. As a result it is clear from the swept paths (again undertaken by industry standard software) that vehicles cannot enter or leave the junction without either encroaching onto the opposing lane of Ladywell Road, overrunning the footways of Ladywell Road as they enter Church Grove and possibly damaging street furniture. It should be noted that there is a street sign and street light in the eastern footway only a short distance from the kerb line of Ladywell Road which inhibits the opportunity of vehicles to overhang the footway on this side. Also large vehicles entering Church Grove do override the footway radius. In addition there is a photograph of a refuse vehicle on the resident's website www.savechurchgrove showing this vehicle overriding the western kerb. Such a vehicle will need to collect refuse from the development site and highlights the difficulties of accessing the development site by larger vehicles. Reference should also be made to Sketches 5 and 6 which show a large 10.m long rigid vehicle entering leaving Church Grove.

Church Grove lies near the local centre of Lewisham and shopping facilities are close for the surrounding residential area. Public passenger bus stops lie again close to the Church Grove junction on Ladywell Road. In these circumstances pedestrian use of the Ladywell footways is significant at certain times and as such pedestrians would be placed at risk by vehicle overrun. In terms of using the opposing traffic lane, encroachment into this would give rise to conflicting traffic movements as vehicles signalling would not match the driver movement and delay to following traffic as the driver holds back for a gap in oncoming traffic on the main road.

With regard to the delivery of the static caravans it is reasonable to expect that this can only be achieved if residents' vehicles are removed from Church Grove where, subject to the TRO, they are lawfully entitled to park. Movement of the static homes will not be subject to the control of the Local Planning Authority and as such as the residents have no other reasonable areas to park – and competition for spaces is already high, then this is an imposition on the residents over which they too have no control. This is a factor which should be taken into consideration as part of the overall suitability of the site.

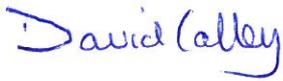
In conclusion it is considered that Church Grove is totally unsuitable as a means of access to this site and the use has the potential to materially affect the safety of residents and the general public on the public highway. These concerns are specific and cumulative and in our opinion are of such weight to materially affect the safe operation of Church Grove.

Finally it should be recognised that there can be a fear and intimidation generated by the passage of traffic and that this is dependant on the volume, its hgv composition, its proximity

to people or the lack of protection caused by factors such as narrow pavement widths. The *Guidelines for the Environmental Assessment of Road Traffic* notes that there are no commonly agreed thresholds for estimating levels of danger, or fear or intimidation. As such the level of intimidation and fear rests with the receptor and the quality of life for residents of Church Grove, especially those with children who may play out in the street, is likely to be detrimentally affected by this proposal.

The above information outlines those traffic related matters which are of concern to local residents and I trust will be taken into consideration when assessing the acceptability of the development proposals.

Yours sincerely



David Colley
Associate Director
Sanderson Associates (CE) Ltd

Chapter aims

- Advise how the requirements of different users can be accommodated in street design.
- Summarise research which shows that increased visibility encourages higher vehicle speeds.
- Describe how street space can be allocated based on pedestrian need, using swept path analysis to ensure that minimum access requirements for vehicles are met.
- Describe the rationale behind using shorter vehicle stopping distances to determine visibility requirements on links and at junctions.
- Recommend that the design of streets should determine vehicle speed.
- Recommend a maximum design speed of 20 mph for residential streets.

7.1 Introduction

7.1.1 Several issues need to be considered in order to satisfy the various user requirements detailed in Chapter 6, namely:

- street widths and components;
- junctions;
- features for controlling vehicle speeds;
- forward visibility on links; and
- visibility splays at junctions.

7.2 Street dimensions

7.2.1 The design of new streets or the improvement of existing ones should take into account the functions of the street, and the type, density and character of the development.

7.2.2 Carriageway widths should be appropriate for the particular context and uses of the street. Key factors to take into account include:

- the volume of vehicular traffic and pedestrian activity;
- the traffic composition;
- the demarcation, if any, between carriageway and footway (e.g. kerb, street furniture or trees and planting);
- whether parking is to take place in the carriageway and, if so, its distribution, arrangement, the frequency of occupation, and the likely level of parking enforcement (if any);
- the design speed (recommended to be 20 mph or less in residential areas);
- the curvature of the street (bends require greater width to accommodate the swept path of larger vehicles); and
- any intention to include one-way streets, or short stretches of single lane working in two-way streets.

7.2.3 In lightly-trafficked streets, carriageways may be narrowed over short lengths to a single lane as a traffic-calming feature. In such single lane working sections of

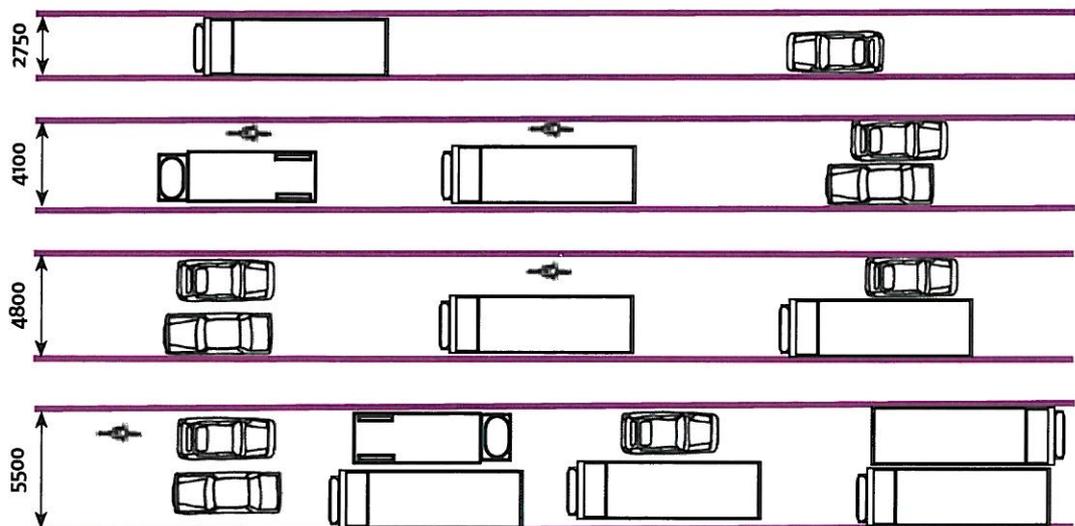
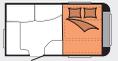
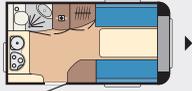


Figure 7.1 Illustrates what various carriageway widths can accommodate. They are not necessarily recommendations.

FIXED BED

380 TB



De Luxe
L: 569cm B: 220cm
G: 1.100kg



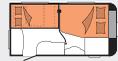
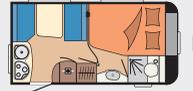
400 SF



De Luxe
L: 590cm B: 220cm
G: 1.200kg



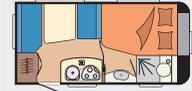
400 SFe



De Luxe
L: 593cm B: 230cm
G: 1.200kg



410 SFe

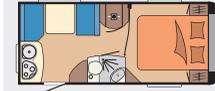


Excellent
L: 614cm B: 230cm
G: 1.200kg



QUEEN SIZE BED

490 SFf



Excellent
L: 700cm B: 230cm
G: 1.400kg



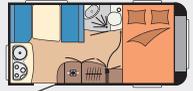
440 SF



De Luxe
L: 626cm B: 230cm
G: 1.200kg



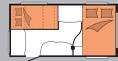
440 SFr



Excellent
L: 626cm B: 230cm
G: 1.200kg



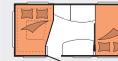
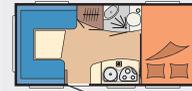
440 SFr



Premium
L: 668cm B: 230cm
G: 1.500kg



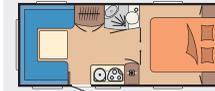
455 UF



Excellent
L: 661cm B: 230cm
G: 1.350kg



560 UFf



Excellent
L: 762cm B: 250cm
G: 1.600kg



460 UFe



De Luxe, Excellent
L: 676cm B: 230cm
G: 1.350kg



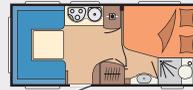
460 UFe



Premium
L: 715cm B: 230cm
G: 1.500kg



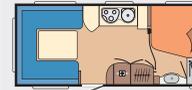
495 UFe



Excellent
L: 688cm B: 230cm
G: 1.400kg



540 UFe



Excellent
L: 738cm B: 230cm
G: 1.500kg



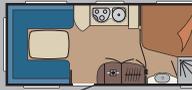
650 UFf



Premium
L: 882cm B: 250cm
G: 1.900kg



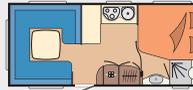
540 UFe



Premium
L: 774cm B: 230cm
G: 1.750kg



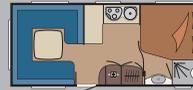
560 CFe



De Luxe, Excellent
L: 762cm B: 250cm
G: 1.600kg



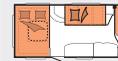
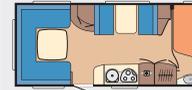
560 CFe



Premium
L: 801cm B: 250cm
G: 1.750kg



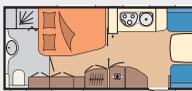
650 UMFe



Prestige
L: 843cm B: 250cm
G: 1.900kg



650 WFU



Prestige
L: 843cm B: 250cm
G: 1.900kg



770 CFe



Landhaus
L: 913cm B: 250cm
G: 2.300kg



DESIGN

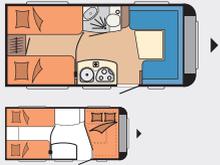
- F Fixed bed
- K Children's bed
- L Single bed
- M Central seating unit

- S Side seating unit
- B Forward seating area
- T Compact shower room
- U Circular seating unit

- C 3/4 couch seating group
- W Washroom
- f free-standing
- e external bathroom

SINGLE BEDS

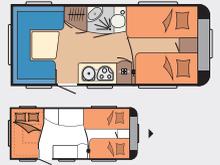
460 LU



Excellent
L: 661cm B: 230cm
G: 1.350kg



495 UL



De Luxe, Excellent
L: 724cm B: 230cm
G: 1.400kg



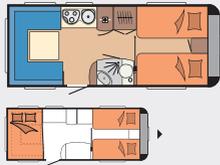
495 UL



Premium
L: 763cm B: 230cm
G: 1.600kg



540 UL



De Luxe
L: 741cm B: 230cm
G: 1.500kg



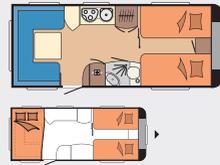
540 WLU



Excellent
L: 738cm B: 230cm
G: 1.500kg



560 UL



Excellent, Prestige
L: 762cm B: 250cm
G: 1.600kg



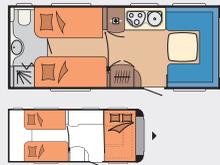
560 UL



Premium
L: 801cm B: 250cm
G: 1.750kg



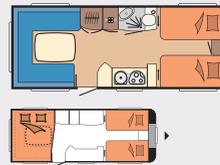
560 WLU



Prestige
L: 760cm B: 250cm
G: 1.600kg



610 UL



Prestige
L: 810cm B: 250cm
G: 1.900kg



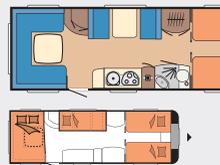
610 UL



Premium
L: 844cm B: 250cm
G: 1.900kg



720 UML



Prestige
L: 915cm B: 250cm
G: 2.000kg



720 UML

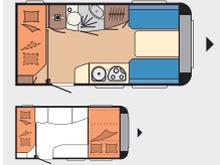


Premium
L: 949cm B: 250cm
G: 2.300kg



CHILDREN'S BEDS

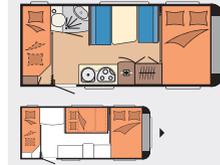
420 KB



De Luxe
L: 620cm B: 230cm
G: 1.200kg



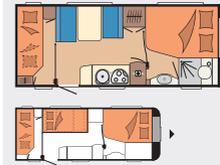
490 KMF



De Luxe
L: 700cm B: 230cm
G: 1.400kg



540 KMFe



De Luxe
L: 755cm B: 230cm
G: 1.500kg



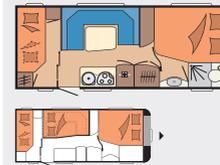
545 KMF



De Luxe
L: 753cm B: 250cm
G: 1.600kg



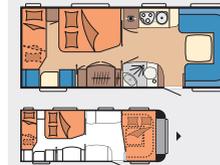
560 KMFe



De Luxe, Excellent
L: 762cm B: 250cm
G: 1.600kg



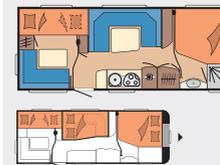
650 KFU



Prestige
L: 848cm B: 250cm
G: 1.900kg



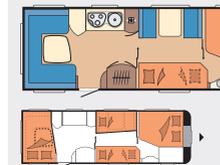
650 KMFe



De Luxe
L: 843cm B: 250cm
G: 1.900kg



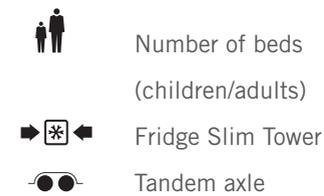
720 UKFe



Prestige
L: 914cm B: 250cm
G: 2.000kg



EXPLANATION OF SYMBOLS



TECHNICAL DATA

L: total length
B: total width
G: Technically permissible gross weight

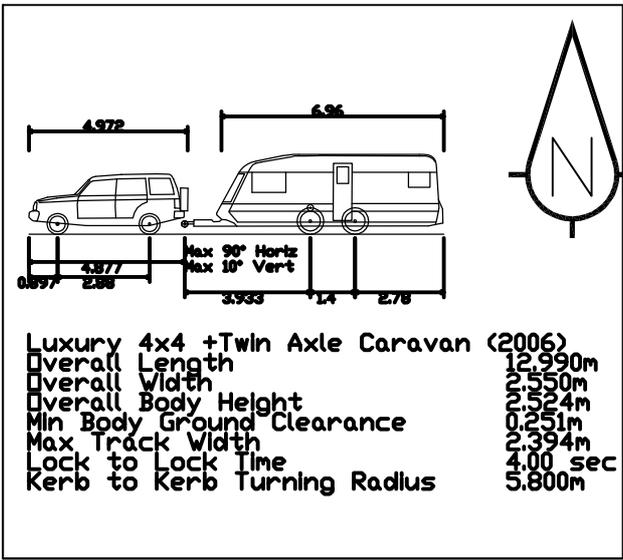


Luxury 4x4 +Twin Axle Caravan (2006)
 Overall Length 12.990m
 Overall Width 2.550m
 Overall Body Height 2.524m
 Min Body Ground Clearance 0.251m
 Max Track Width 2.394m
 Lock to Lock Time 4.00 sec
 Kerb to Kerb Turning Radius 5.800m



Church Grove, Lewisham
 Left In Swept Path

Drawn SB	Scale 1:200	
Checked DJC	Date Nov 2011	
Approved DJC	Drawing Number Sketch 1	Size A4

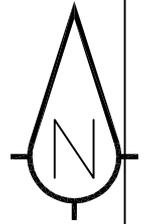
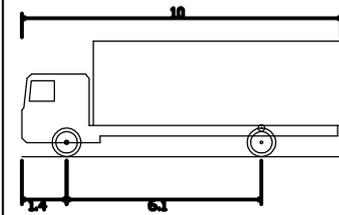



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Church Grove, Lewisham

Left Out Swept Path

Drawn SB	Scale 1:200	
Checked DJC	Date Nov 2011	
Approved DJC	Drawing Number Sketch 2	Size A4



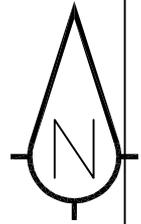
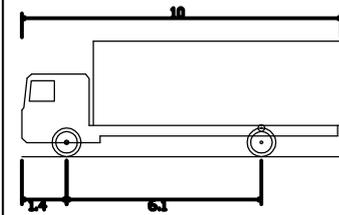
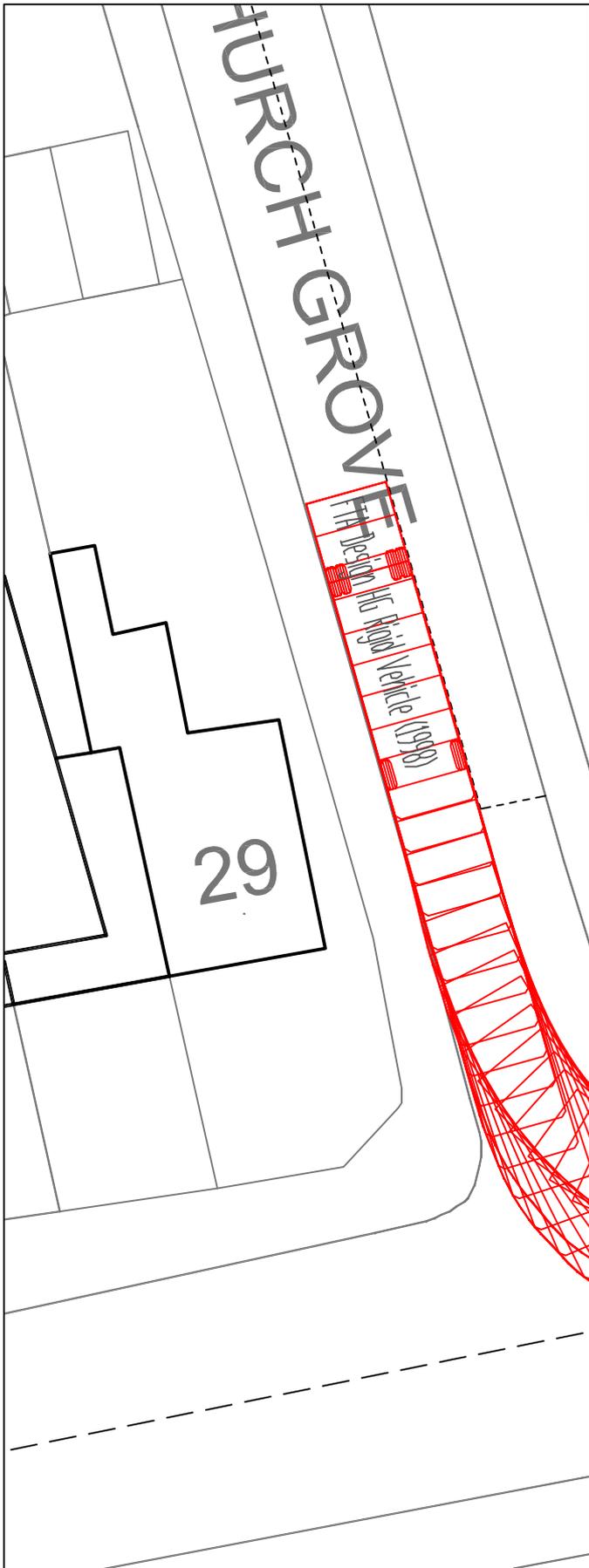
FTA Design HG Rigid Vehicle (1998)
 Overall Length 10.000m
 Overall Width 2.500m
 Overall Body Height 3.645m
 Min Body Ground Clearance 0.440m
 Track Width 2.470m
 Lock to Lock Time 3.00 sec
 Kerb to Kerb Turning Radius 11.000m


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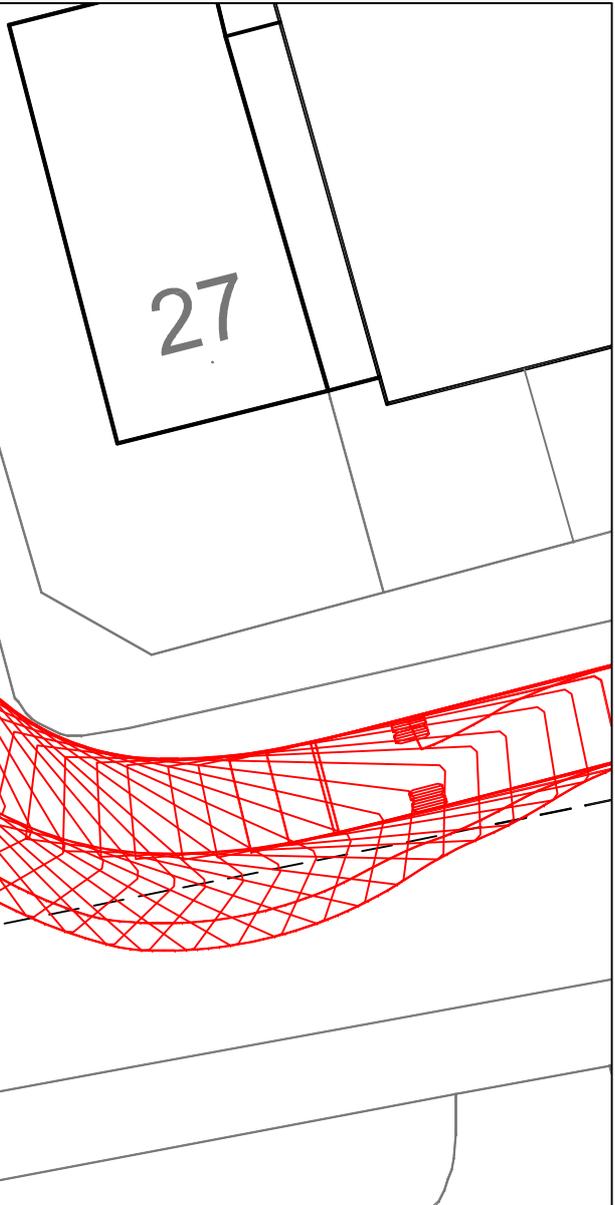
Church Grove, Lewisham

Left In Swept Path

Drawn SB	Scale 1:200	
Checked DJC	Date Nov 2011	
Approved DJC	Drawing Number Sketch 5	Size A4



FTA Design HG Rigid Vehicle (1998)
 Overall Length 10.000m
 Overall Width 2.500m
 Overall Body Height 3.645m
 Min Body Ground Clearance 0.440m
 Track Width 2.470m
 Lock to Lock Time 3.00 sec
 Kerb to Kerb Turning Radius 11.000m

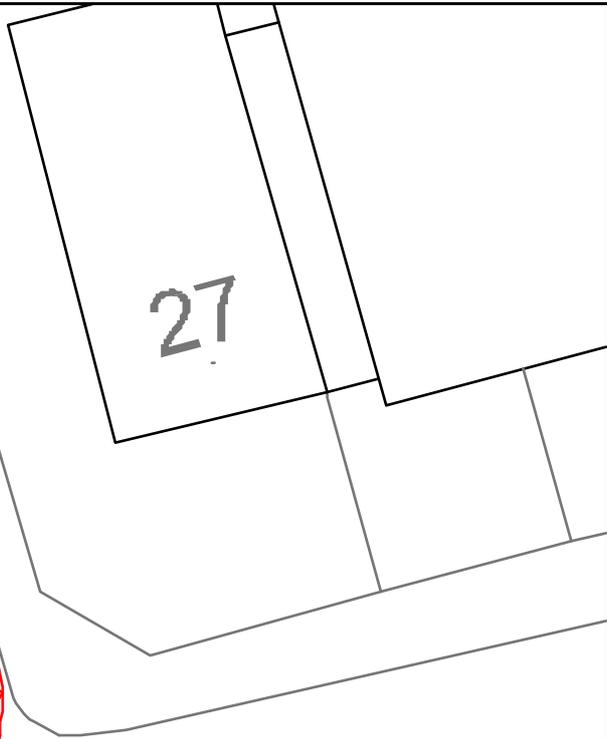
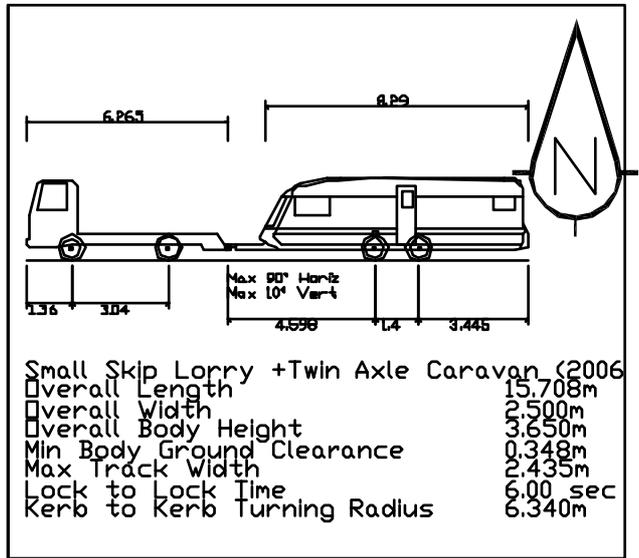



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Church Grove, Lewisham

Left Out Swept Path

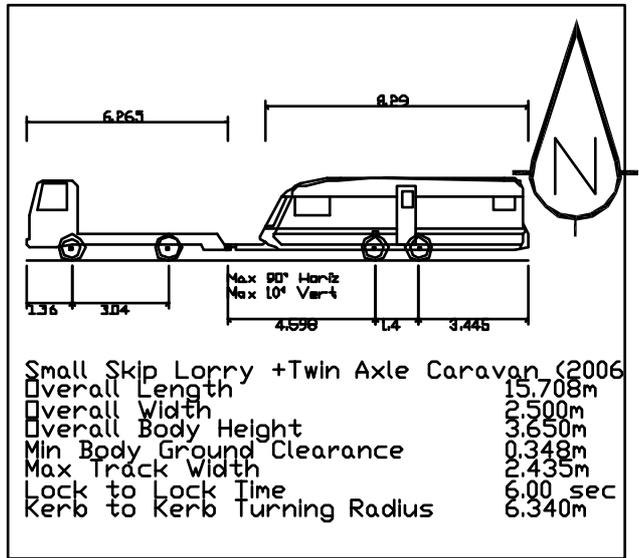
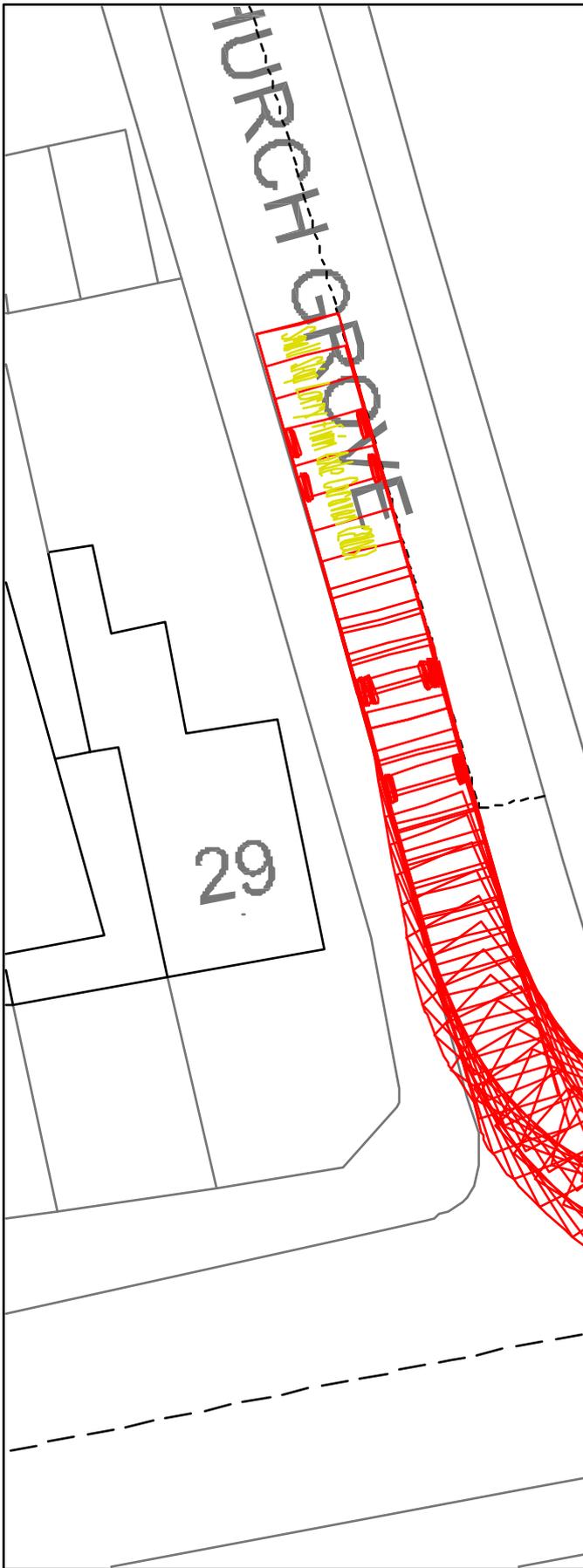
Drawn SB	Scale 1:200	
Checked DJC	Date Nov 2011	
Approved DJC	Drawing Number Sketch 6	Size A4



Church Grove, Lewisham

Left In Swept Path

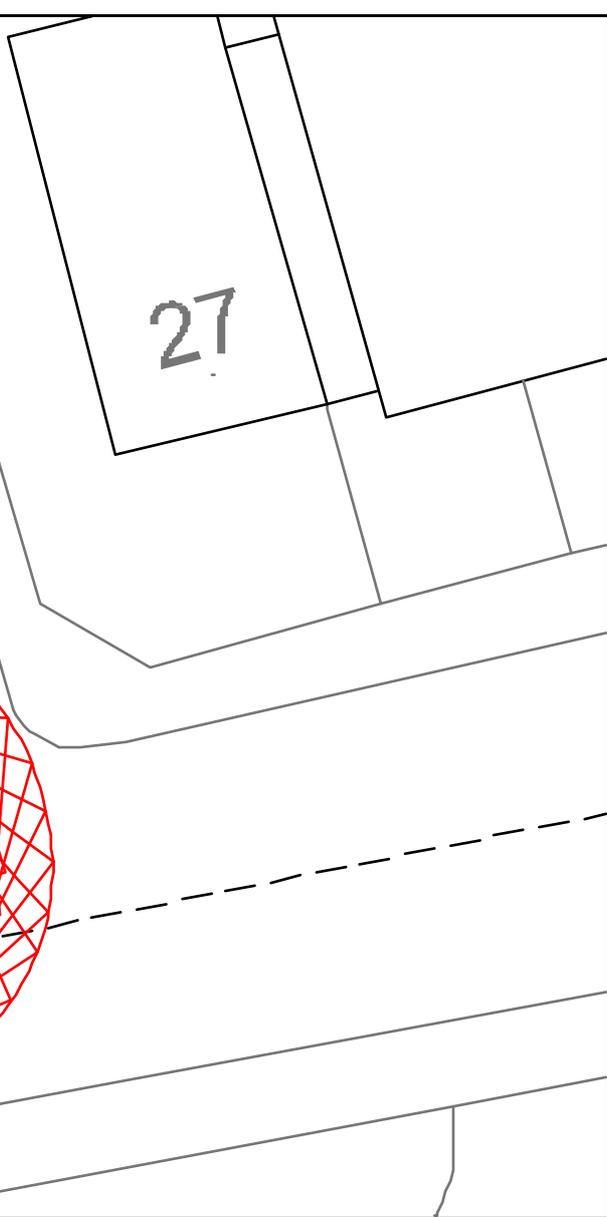
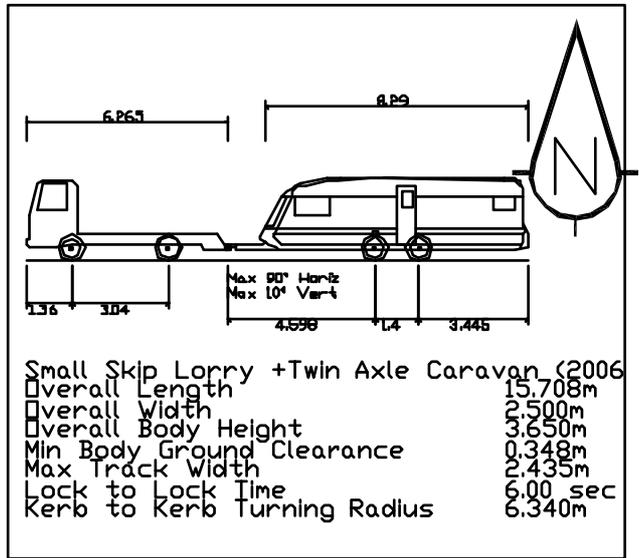
Drawn DH	Scale 1:200	
Checked DJC	Date Dec 2011	
Approved DJC	Drawing Number Sketch 9	Size A4



Church Grove, Lewisham

Left Out Swept Path

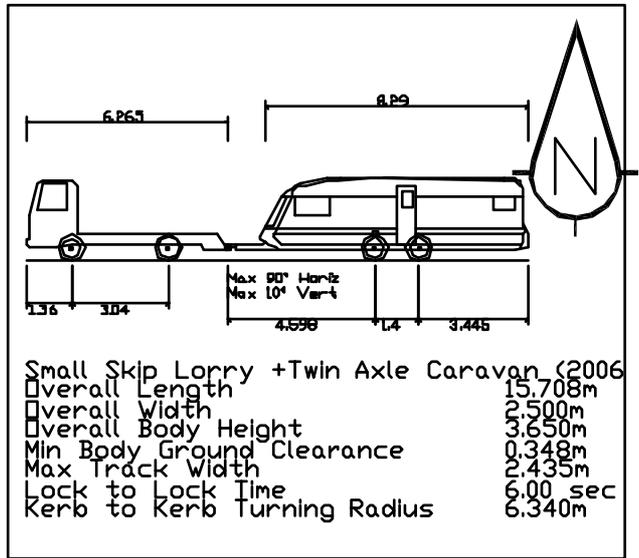
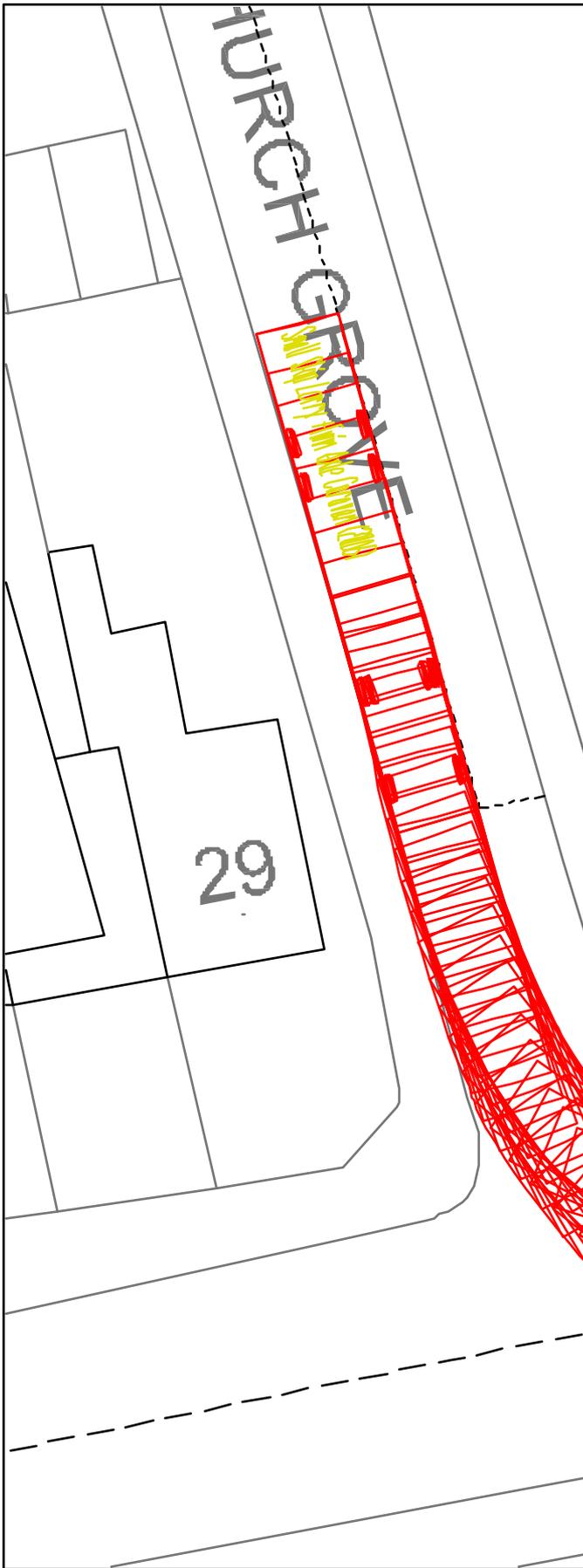
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Checked DJC	Date Dec 2011	
Approved DJC	Drawing Number Sketch 10	Size A4



Church Grove, Lewisham

Left In Swept Path

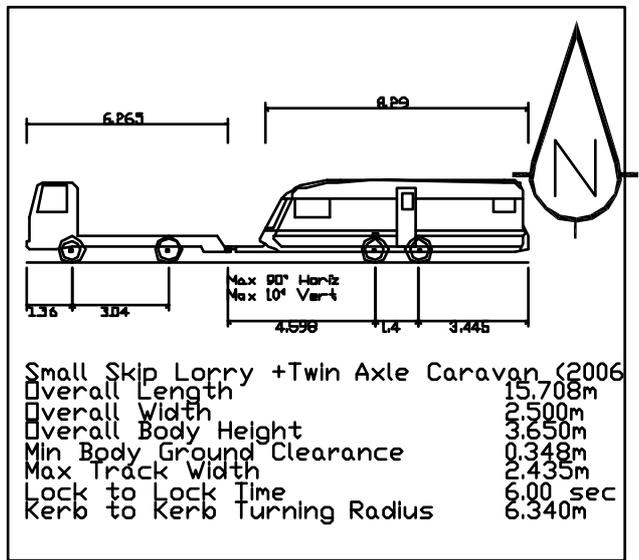
Drawn DH	Scale 1:200	
Checked DJC	Date Dec 2011	
Approved DJC	Drawing Number Sketch 11	Size A4



Church Grove, Lewisham

Left Out Swept Path

Drawn	Scale	
DH	1:200	
Checked	Date	
DJC	Dec 2011	
Approved	Drawing Number	Size
DJC	Sketch 12	A4



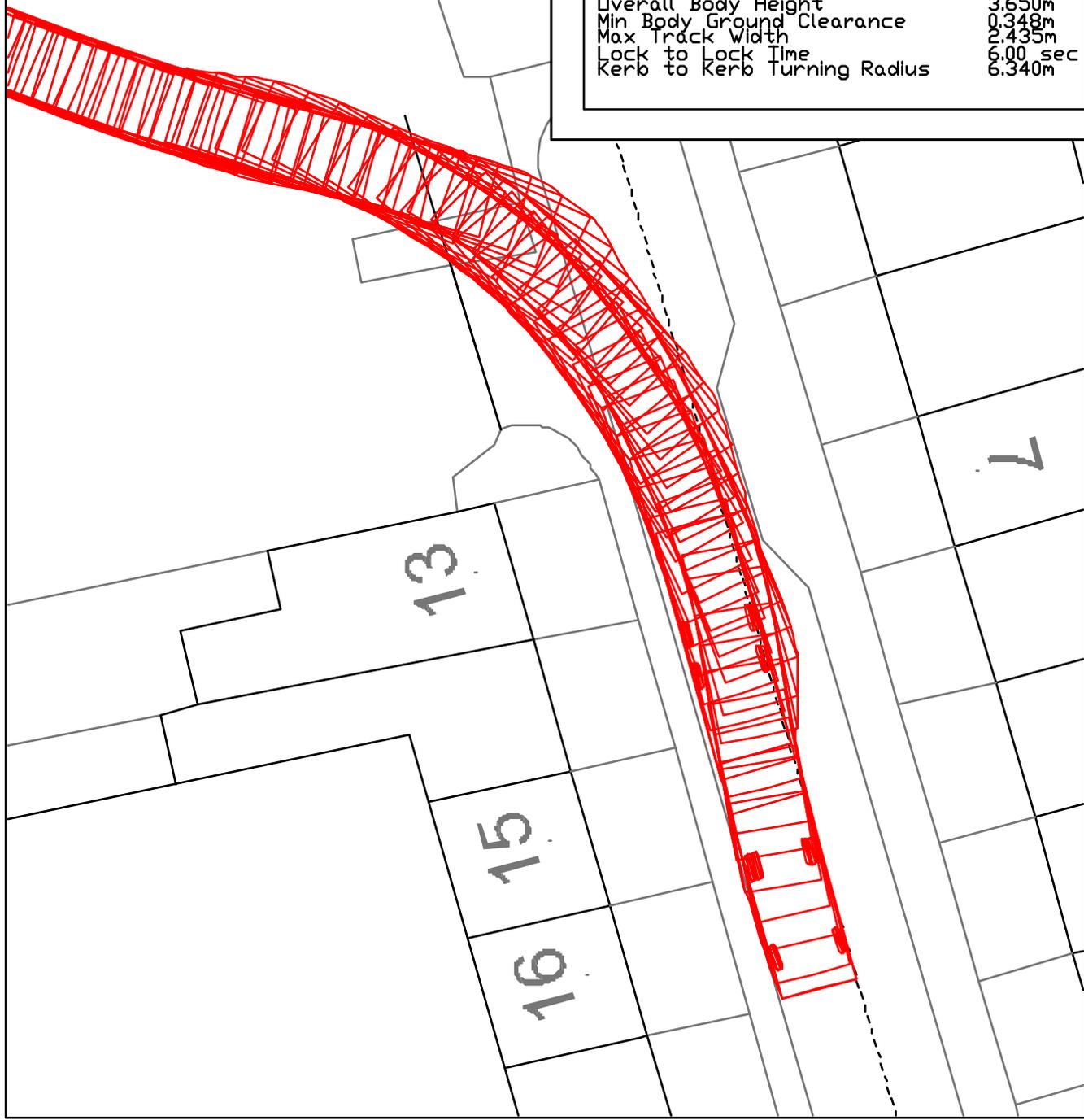
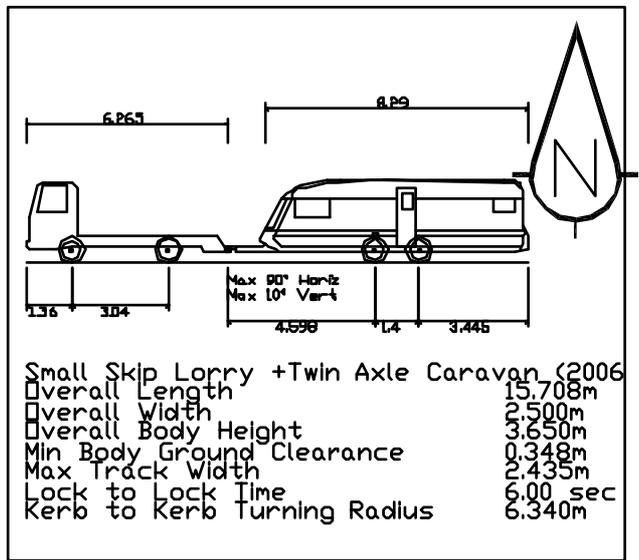
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Church Grove, Lewisham

Left Into Site Swept Paths

Drawn DH	Scale 1:200	
Checked DJC	Date Dec 2011	
Approved DJC	Drawing Number Sketch 13	Size A4



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Compilation of on-line responses to consultation		
1	I believe that Lewisham council not only has a legal duty to re-home travellers in Lewisham but a moral responsibility too. Since Thurston rd was closed some time back the ground has remained empty and is an eyesore. I believe that the proposed site is ideal for their needs.	se137jj
2	Access is too limited and there is not enough space to accommodate caravans, I for one object to this development.	SE4 1JR
3	The site is too small. The road is too narrow and it will be difficult to navigate caravans and lorries up and down. the site is prone to flooding. There is a very large lorry park behind the town hall - this can accommodate a larger number, room to navigate and is not prone to flooding. perfect.	SE4 1Jp
4	I don't have any serious objections to the development of this site for Travellers. However the street does look very, very narrow. I think the council should certainly have a good look to make sure that this site really is the best option in light of that and the issue of access for the emergency services.	SE13 7JD
5	Inappropriate for the area. The area is a conservation area.	SE4 1YL
6	I'm not happy about the travellers site being situated on Church Grove in Ladywell. It is situated off a main road which is congested at the best of times. Adding more traffic around there could be catastrophic to the area. I also feel that Ladywell is beginning to come up in the world. We've had a few new shops opening like El's Kitchen and Slater and King and putting a travellers site in the area will just bring it down again and lower house prices.	SE13 7JU
7	The access to the site is too narrow for the community to be able to move their homes in and out acceptably. I live in a road where a fair size development is taking place and access into the site is restricted, meaning that lorries are left double parked in the road. The area should be a conservation zone (if it is not already one) so the siting of a Gypsy and Traveller Community next door does not seem to be the most appropriate development for the area.	SE13 7AT
8	I am totally opposed to this suggestion. The access to this site is too narrow, and unless you are planning to demolish the houses on one side of the street, it cannot be widened to meet the needs of travellers and their caravans. I am curious as to why this problem was not solved before the closure of the Thurston Road site, and I cannot help wondering where the travellers apparently made homeless by the closure of this site are currently residing.	SE13 7AD
9	The road leading to the site is very narrow that it won't be able to cope with the traffic. Also the site is very small for the community.	SE13 7XQ
10	Thank you for the opportunity to comment on this proposal. The former Watergate school site on Church Grove is available for redevelopment. There is the potential for redevelopment for a number of different purposes that could help meet the need of the Lewisham's residents - one group of residents being the Gypsy and Traveller community. However, the needs of all the residents of Lewisham need to be considered and that the outcome is fair. I believe there are two questions Councillors and officers should consider when assessing this proposal: 1) Meeting the needs of local residents : Is the redevelopment of the site to meet the	SE4 1AQ

	<p>accommodation needs of the borough's Gypsy and Traveller community the optimum use of the space available given the housing needs of Lewisham residents? 2) Fairness between service users : Central Government has imposed cuts on the formula grant payments to the borough. When compared to other possible uses for the site, would redevelopment to meet the accommodation needs of the Gypsy and Traveller community result in greater cuts to essential frontline services for other users than would otherwise be the case? Meeting the needs of all Lewisham residents The Housing Act 2004 requires Local Authorities to 'carry out an assessment of the accommodation needs of gypsies and travellers residing in or resorting to their district' (Housing Act (2004) 225:(1). This is not an absolute. Clearly space within the borough available for redevelopment is limited. Do the Gypsies & Travellers residing in Lewisham at the time of the assessment have an equal or greater housing need than other residents for which the site might be redeveloped? The proposal is to redevelop the site to provide up to nine pitches for travellers. According to the Local Dialogue (2011) 'Lewisham Gypsy and Traveller Future Needs Assessment' report to the Council over 100 traveller families live happily in bricks and mortar accommodation in Lewisham. Those who previously occupied the site in Thurston Road are already in accommodation provided by the Council. The latest DCLG Traveller Caravan Count (2011 Table 2) does not indicate there is any 'need' for caravan accommodation in the borough. Could a redevelopment of the site into a higher density mix of private and social housing over several stories provide more homes for the 536 homeless households in the borough or the 6,777 (across all tenures) identified by the Core Strategy (7.11) than redevelopment into Gypsy and Traveller accommodation? This is simply a question of priorities between competing ends. Ensuring fairness The Council has decided to make savings of £88million over the next four years. Under these circumstances provision for one group of service users must be very carefully assessed against the impact on others. Would higher density housing provision on the site, above the up to nine traveller sites proposed result in the Council receiving higher Council Tax income and therefore have more money available to spend on frontline services than under the current proposal? The evidence base The assessment of the future needs of Gypsy and Travellers suggested a need for between 14-9 pitches (Local Dialogue (2011) 'Lewisham Gypsy and Travellers Future Needs Assessment') is concerning. For example, the report assessment of need included 'New Age Travellers' this group is not defined as Travellers by the Department for Communities and Local Government. "All families who have officially registered an interest in living on a pitch site are Irish Travellers, with no Roma Gypsies, English Gypsies and New Age Travellers living in the borough expressing a specific interest in living on a pitch site." (p.4) The term 'Gypsies and Travellers' is defined in DCLG Guidance (October 2007) as: 1. persons with a cultural tradition of nomadism or living in a caravan; and 2. all other persons of a nomadic habit of life, whatever their race or origin, including a) such persons who, on grounds only of their own or their family's or dependant's educational or health needs or old age, have ceased to travel temporarily or permanently; and b) members of an organised group of travelling show people or circus people (whether or not travelling together as such). (p.10) The report was prepared based on interviews with 'Travellers' and Council officers (pp.11-12) but not apparently other residents of the Borough. Why was it felt necessary to exclude other local residents? For example those on the housing waiting list? Why does the report not attempt to quantify the costs and benefits of alternative uses of the site or alternative sites within or outside of the borough? Many thanks for the opportunity to comment</p>	
11	<p>This land is totally unsuitable as a traveller's site. The road is too small to negotiate larger vehicles - it is hard enough in a car. Parking in this road is bad enough for residents anyway - this was one of the main reasons this was rejected before</p>	SE13 7AA

12	I see no benefits whatsoever in having the site as proposed, it make no contribution to turning Lewisham a better a place and quite on the contrary the Council is trying hardest to make Lewisham one of the worst place to live for residents in London. If Lewisham is falling behind every other boroughs in healthcare, education, public service, then look into this completely ridiculous and unjustified proposal. If this is the Council's intention to bring down Lewisham, then please say it loud and call an immediate local re-election. The proposal should be rejected immediately without wasting more of tax payers money. Â is an oblf this is Rather than encouraging residents to working	SE4
13	There's a big cost implication to have such developments in London Zone 2. There are dozens of better choices in terms of location out there and would be a big mistake to go ahead with such poor idea. It would certainly make the biggest joke in London. The revenue for such activity is small and not attractive at all. Lets face it, a plan should at least work financially. This will reflect the how shallow Lewisham Council is. Cleary there is a big need for some level headed business minds to run the council.	SE4 1SY
14	No thank you. Insufficient access, space, infrastructure or social services (school places etc) to support this.	SE13 7JQ
15	This should be used for social housing rather than a traveller site. With local needs this would be a more valuable resource to the area.	SE4 1RA
16	I think it's a really bad idea	se6
17	This is obviously quite a contentious issue and to house these people it needs to be done properly. I am afraid i am not seeing that the council has put proper though into it and hasn't thought of the consequences, particularly on access, health and safety, fire access etc. The homes will simply not fit the measurements down Church Grove. Lewisham Council needs to do this properly and choose a space that does fit all the requirements. Furthermore, to give these people a fair chance of integrating, don't start on a bad foot with residents by disregarding their views.	SE13 7UW
18	I cannot think of a more inappropriate position for such a site. Inadequate access, too much work needed to make the clear the existing site and too close to an existing community. All of this in a designated conservation area. Further, this was a site which had ALREADY been declared wholly unsuitable in the previous consultation. A view shared and agreed by the various Traveller groups approached, local residents and local council and parliamentary representatives. Seems as if the council is simply conveniently deciding not to listen. All of this while the previous site cleared in Thurston Road remains vacant and undeveloped. Maybe there is some benefit in admitting past mistakes and returning to the Thurston solution. This idea is wrong, poorly thought through and the council should save our time, our money and our patience and show some leadership.	SE13 7DG
19	I can see nothing positive about the proposed plan. The site could be put to much better use by creating affordable and desirable permanent accommodation for some of Lewisham's existing population. Ladywell as an area will suffer, as such a plan will have negative effect on the area's reputation. Also Church Grove is not a wide enough road to accommodate caravan traffic.	SE13 7AW
20	I am currently looking to buy a flat in Ladywell, first time buyer and just read about the proposed plans and this puts me off greatly to think that if I buy a place a traveller site might be likely to devalue my possible property. I think this will put off young first time buyers like myself moving to the area.	N19 3ju
21	I attended the exhibition and displays on Sat. 12th at the St Mary Centre and spoke with a council officer staffing the event. I fully support the proposal. It is vital and essential that Lewisham seeks to meet the housing needs of all those in our community.	SE6 4JW

22	There is only one way to decide this major issue and that is for the residents of Ladywell to be given the democratic right to vote on the outcome but we know that won't happen don't we? Reasons? Well the council will trot reasons on the lines of, no.1 it would be it would be far too expensive no2. there's no suitable time 'window' for it to be organised and no. 3 there's no other suitable site. Of course the real reason being the overwhelming vote against it couldn't be manipulated and interpreted by the council to provide a favourable 'Yes' vote as their 'consultations' can as we remember from their 'consultations' on the new school on the Leisure centre site, Ladywell CPZ, Ladywell Conservation Area and 20mph Zone issues. A Democratic ballot is the only fair way to decide and the sooner the better! Ken Starkey [Algernon Rd. resident of some 34 years]	SE13 7AN
23	My view is that this proposal is completely inappropriate. It is welcome that the council is taking steps to meet it's duty to provide pitches for traveller families, however, Church Grove is not the right site. The extremely narrow access road makes it utterly unsuitable as a site for touring caravans of up to 2.5m width to gain access without causing likely hazard to pedestrians, damage to other vehicles and the pavement etc, as well as disruption to the lives of residents. This proposal has serious potential to create a highly charged and difficult relationship between local residents and the traveller community, as the inappropriate nature of the site regarding access will cause friction and difficulty. I therefore regard it as a deeply misguided proposal that could damage relations between the settled and traveller communities. I am also deeply concerned at the inadequate information the council has based this decision on. Basing the decision on the input of 11 travellers (out of nearly 500) is unrepresentative and no basis for making a decision on the desires of the traveller community in Lewisham. The council should withdraw this ill-advised proposal and reconsider other more suitable sites.	SE4 1HQ
24	Lewisham is a traditional 'home' for Romany travellers and appropriate space to meet their needs must be to be found within the borough. I am saddened by the kinds of objections raised to the proposal by various online forums. Without a doubt the Romany / Traveller community face a level of discrimination and prejudice that would result in outrage & successful legal challenge if faced by other groups. I hope the council meets its moral and legal duty to be inclusive of all groups in the borough not just homeowners.	SE23 2JW
25	If they are travellers then why do they need amenity blocks? How much rent & council tax will they pay for these blocks? You state that there are provisions for a certain amount of plots, what happens if more travellers turn up then there are plots? Who polices this? How did you come to this conclusion when Catford Dog track is clearly a better site	se13 7un
26	As I understand it the site will be very small. I am not against it, but I do think that it's important that those people living there are not treated with 'kid gloves' and are expected to adhere to the same norms of behaviour that other local residents are, i.e. limits on numbers of dogs, noise, methods of waste disposal etc. Will they be expected to pay council tax?	SE4
27	I consider there is a huge and important issue over access. I also consider that the fact that the site borders on a conservation area is of extreme importance. If this is ignored, then it makes a mockery of the whole idea of "Conservation areas". As the site will only provide five pitches, I consider that a larger area of land should be sought. I consider the former Catford dog site to be far more suitable.	SE13 7UT

28	<p>I cannot think of a more inappropriate place for such a site. The road is way too narrow; the emergency access problem must be a concern and the cost of creating the site extortionate in a time when every bit of cash is vital. The consultation process has made a joke of Lewisham council and the fact that the site was previously declared inappropriate just compounds the complete waste of time and money. Lewisham is 14 square miles in size, are we really saying that this is the best place in one of Inner London's largest boroughs? What was wrong with Thurston Road, what is wrong with the lorry park behind Laurence House? There are plenty of other unused sites in Lewisham which could easily be used or is it simply because the Church Grove site cannot be sold off to the highest bidder for housing development? The welfare of the people is the first great law! The welfare of the people in Church Grove seems to have been disregarded as well as the welfare of those intended to use the site. This is big government at its absolute worst. Listen to the people who elect you and pay you.</p>	SE13 7DG
29	<p>The Ladywell Village Improvement Group is opposed to the Council's plans for a traveller site at the end of Church Grove. It believes this constrained site with inadequate access arrangements is unsuitable for the proposed development and urges the Council to look again at alternatives in the Borough that will better enable it to deliver its statutory obligations. LVIG is appalled at the way Church Grove residents have been treated, having been told in the last year first that they could set up a community garden on the site, then that the site would instead be put to educational use. News that the site had once again been identified for a Traveller Site came as a complete shock. Whilst there were seven sites on the shortlist put to Mayor and Cabinet, the somewhat arbitrary selection criteria were skewed to favour a Council-owned site with existing planning permission even though recent history suggests there is little or no urgency. Furthermore the Council has conveniently ignored the access shortcomings and other suitability issues in national guidance and the fact that 5 units will go no significant way to meet the Council's own assessed demand for a minimum of 17 units by 2012. Inexplicably consultation is only taking place in relation to one site, the smallest of the seven: if in reality this has already been chosen why insult residents with this charade of consultation? LVIG, which campaigns for improvements to the neighbourhood and strives to encourage more investment in a poorly-managed conservation area, believes the proposals for the site will not boost the area's regeneration or promote the profile of a neglected part of the borough. The fact that this will be a Council-managed site gives no reassurance that it will be well-run and any sort of asset to the area. The Council has behaved in a high-handed manner and all recent evidence suggests it is set on ignoring local concerns. The Council's apparent determination to push through this proposal highlights a lack of a strategic vision for the neighbourhood and LVIG invites the Council to embark on a broad, more meaningful consultation with residents about the future of the Ladywell area.</p>	SE13
30	<p>As someone who has lived in Ladywell for 20 years I am outraged by the decision to consult only on this site - not because of any nimby prejudice against travellers - but because of the amateurish way this has been handled and the weakness of the case for the Watergate School site which is unsuitable for any number of reasons, access and size being the most obvious. One the one hand the Council has identified a need for 17 pitches by 2012, on the other it has gone for the smallest of the potential sites purely (as far as one can tell) because it is Council owned so can be delivered quickest. This is the wrong site and the Council must go back to the drawing board. There is no urgency (there has been no travellers site in Lewisham for over 2 years) so why not make sure the right site is selected that will meet the identified need/demand, even if it takes a little longer?</p>	SE13 7AW
31	<p>Not appropriate in such a small local centre - it would completely alter the social make-up of the area. Also unfair on the Church Grove residents when they live on such a small street.</p>	SE4 1JY

32	<p>I oppose Lewisham Council's intention to site a traveller community in a location which puts both traveller families and local residents at risk because... I am opposed to the potential development of the former Watergate School site on Church Grove as a traveller site because... The Council's November-December 2011 'consultation' of Ladywell / Lewisham residents has been an utter farce and is completely invalid. The Council began by 'consultation' process by lying to residents in writing!!!!!!!!!!!!!! The Council does not have a clue what the needs of the borough's Gypsy and Traveller community are: it's just trying to fit up church Grove - again. THE SITE IS UNSUITABLE FOR TRAVELLERS The Watergate site is as disastrous a choice for travellers as it is for local residents because: it is completely overlooked by Church Grove residents & Council offices it is contaminated with toxic cadmium (ex foundry) it is on a flood plane next to the river Ravensbourne it has noise pollution from the Hayes railway line and heavy Council vehicles in the Council depot opposite it has only one point of access into and out of the site access down Church Grove (a narrow cul de sac) is not wide enough for fire engines or caravans to drive down. CARAVANS CAN'T GET INTO THE SITE Travellers often use touring caravans (not to be confused with static caravans which aren't moved) that are 2.55m wide. In order to tow a 2.55m wide caravan the towing vehicle legally must have wing mirrors that protrude a further 25cm on each side taking the full width of vehicle and caravan to 3.05m. By the Council's own measurements the usable width of Church Grove is only 2.6m. In order to avoid scraping the parked cars on one side the driver would be forced to mount the pavement on the other. Mounting a pavement is an offence because it is dangerous but in Church Grove risk is increased because the Victorian pavement is only 96cm wide and most residents have hedges so they have no peripheral vision as they walk on to the pavement. COMMUNITY RELATIONS DISASTER If this insane plan goes ahead relations between the travellers who tow the caravans and the settled community who own the parked cars and live along the tiny pavement of Church Grove will be a complete disaster from day 1. At best - the Council is setting up Church Grove as an access battle zone between the 2 communities. At worst - a serious accident will occur. NO VALUE FOR MONEY The site is adjacent to the St Mary's conservation area so the Council has been forced to budget £1.8 million of tax payers money so far to create accommodation for only 5 traveller families. The recently published Council Needs Assessment for Travellers claims that there are 490 travellers living in Lewisham. If this is true why are they not considering a bigger, more appropriate site? GOVERNMENT GUIDELINES IGNORED I would also like to know why Lewisham Council is content to break so many 'essential' Department for Communities and Local Government guidelines on a site that meets neither the needs of travellers nor the settled community. In summary, through laziness and mismanagement, Lewisham Council is letting down both the traveller community and the residents of Ladywell.</p>	SE13 7UU
33	<p>I am very much opposed to the proposal of redeveloping the Church Grove site. We local people have worked hard to improve our immediate neighbourhood and with much success. We really do consider Ladywell to be our inner-city 'village' and are fiercely proud and protective of it. Within the 'village', the Church Grove residents themselves are a small and tight-knit community, which would be totally destroyed with the coming of the Travellers Site. I had heard rumours that the space would be put to use as an allotment/community garden which much better fits the wants and needs of the existing local people...something for the whole community to get behind, and to further improve the area. The increased traffic flow (of not only vans, but cars and even people) would be, at best, disruptive and at worst, dangerous. We are told that the site will house 5 families, with no mention of exactly how many people each 'family' comprises. I may be wrong, but I suspect it will be more than the average '2.4'. There are already often problems at the weekends with vehicles from The Saint Mary Centre using Church Grove and Ladywell Road to park,</p>	se13 7ut

	<p>causing inconvenience and noise to us local residents - in attracting more people to the area, the problem is bound to become worse. This is not to mention the width of Church Grove and the access problems this would cause - presumably parking would have to be suspended to allow the caravans to pass which is unfair and inconvenient to residents. On a personal note, I only bought in the area 2 years ago at which point I was informed that our local Councillor had assured Church Grove residents that the site would not be redeveloped for travellers. At the time, my surveyor said that if it were to happen then the value of the property would almost certainly be affected (negatively). I think it is highly unfair that the site be placed in an area that has worked hard to improve and smarten itself up, through groups like the Ladywell Village Improvement Society. We, the residents, potentially stand to gain nothing and lose a lot, both financially and socially if the site arrives on our doorstep and I would urge the Council to consider other options as the atmosphere is already highly charged in the area about this decision and I doubt the arrival of the Travellers would be met with enthusiasm.</p>	
34	<p>I think it's fraught with potential pitfalls due to the narrow road and limited access to the site and the likely width and length of vehicles that may need to access the site. I feel strongly that the Council does need to fulfil its responsibility to make provision for the travelling community, but think that they would stand a much better chance of success if they looked to integrate it within a new development, eg Catford Dog Stadium or Convoys Wharf.</p>	SE4 1JN
35	<p>The site is unsuitable for travellers as it is in a flood plain, it is in a conservation area, access down Church Grove is not wide enough to accommodate fire engines or caravans to drive down. Not to mention it is a waste of money costing £1.8 million pounds for 4 or 5 families at a time when huge public sector cuts are taking place. I think it is an idiotic decision and if it goes ahead will create huge tensions between the settled community and the travellers. Please rethink this plan as it is not right for the travellers, the residents of Church Grove and Ladywell.</p>	se13 7xd
36	<p>The proposed development on the Watergate school site is totally inappropriate, both in terms of meeting the needs of the traveller community, and in respecting the interests of the settled community. I quote from the Government document on policy for the provision of Travellers site's: "...to recognise, protect and facilitate the traditional travelling way of life of Gypsies and Travellers, whilst respecting the interests of the settled community." In Lewisham's recently adopted Core Strategy (CS), CS Policy 2 refers to Gypsies and Travellers, and specifically to the process of identifying suitable sites. It states that a site will be identified through the Site Allocations DPD. It goes on to note that proposals for additional and alternative Gypsy and Traveller sites will be assessed have regard to six criteria. Of these I draw your attention to the following 3 points which are directly relevant to Church Grove:- " b. They are safe and have reasonably convenient access to the road network. c. They have provision for parking, turning, service and emergency vehicles. f. They are designed and landscaped to a high standard which facilitate the integration of the site with the surrounding environment and amenity of the occupiers adjoining the site." I consider that the site does not have a safe and convenient access to the road network, it has inadequate arrangements for turning, service and emergency vehicles and is not designed, therefore, in such a way that allows for its proper integration with the surrounding community, as it would adversely affect the amenities of occupiers of properties adjoining the site. It fails to comply with CS policy 2. Church Grove is a narrow cul de sac. The Council claims that it is 4.6m wide but residents have measured it to discover that it is in fact 4.56m wide. This small difference between how wide the road is supposed to be and how wide it actually is, is very important, as the road is to be the sole access for the arrival and departure of caravans, in the absence of the second access point</p>	SE13 7UU

	<p>that DGLC says is a requirement for a site in this situation. It was argued, by the Council, during the determination of the last application of the former school site for a 5 pitch Gypsy /Traveller site, that the average width of a caravan is 2.2m. Therefore even if the access road is only 4.6m wide, and taking into account parked cars on the street, located in official parking areas nominally 2m wide, the Council considered that the 0.4m clearance would be sufficient for the safe passage of caravans along the street. Unfortunately there is no margin of error. It is understood that the average width of a continental style caravan, as favoured by Gypsy and Traveller communities, is 2.55m. If the road is 4.6m wide, as the Council claims, this will only allow a 2.05m wide space for parked cars leaving a margin of error of only 5cm. If the road is only 4.56m wide the margin of error is reduced to 1cm. These calculations do not for example take into account the need for vehicles towing caravans to have wing mirrors which project a minimum of 250mm. on either side. The Council claims that if there is a need for caravans which are more akin to mobile homes, which are approximately 3m wide, to be manoeuvred along Church Grove, then temporary orders would need to be served. This would be in order to stop cars parking on Church Grove, whilst the caravan is being moved into place, to allow for the transportation of the mobile home to be carried out safely and without damaging parked cars. This seems a wholly disadvantageous position for local residents, given the potentially transient nature of the occupants of the site and therefore the likelihood that caravans will need to access and leave the site on a regular basis. Should the proposed Gypsy /Traveller site be in any part used for the transient Gypsy /Traveller community then there is a greater potential for conflict between the resident population and the Traveller community due to the restricted access on Church Grove. The council have not thought through the impact of a site of this nature in this situation. In addition, the criteria under which the needs assessment has been produced to mark the suitability of Church Grove as a potential site takes no account of the above, and should therefore be considered invalid, as it is based on the original consent for planning, which likewise did not give adequate consideration to the access issues. I also query the validity of the needs assessment, based on data gathered by Local Dialogue: of the 100 or so traveller families in the borough only 11 have been interviewed. This number is too small to be of value. Within that sample group demand for pitches was high, but this is not the same as Need. The conclusion from this report could equally indicate the need for good quality social housing and rented accommodation, as this is the source of the travellers dissatisfaction with their current accommodation. My final point relates to best practise with regard to existing travellers sites. Most well functioning sites that have the minimum social problems, and problems in relations with their surrounding settled communities, have in place a designated specialist management team . Lewisham council have made no provision for this in the form of a concrete proposal for ongoing management of the site, to deal with potential issues and conflicts, (which would surely arise in the light of the dangerous access situation, as just one example of potential problems relating to this site). I would like a reply addressing the above points in clear and precise detail please to : richardhansell@aol.com Richard Knott, December 5th 2011</p>	
37	<p>Lewisham is in desperate need of primary school places. This is a school. How can it be at all cost effective to force costly renovations on existing school buildings to meet this demand when there are existing buildings? Surely there are more appropriate sites for Travellers and their families?</p>	SE6 2AB
38	<p>We are residents of Wearside Road, the proposed development will back directly onto our garden. My wife and I are both 76 years old and in poor health. My wife had a stroke 3 years ago and has still not recovered, she has now been diagnosed with Cancer and is in the middle of Chemotherapy. I am my wife's' carer and was myself diagnosed with Kidney cancer in November 2010,</p>	SE13

	<p>having already spread to my Stomach, Lungs, Liver and Brain. We have lived in our house for 50 years next year and apart from being on the doorstep of the Wearside Road Council yard is has been a pretty peaceful place to live. We have become used to the noise and pollution at the front of the house and learn to live with it as the yard has grown and grown over the years. When we bought our house the land behind was almost farmland, with just an old man living in a small hut, some years later the school was built and the playful noise of the children at Watergate was welcomed, our five children used to chat to the Watergate children over the fence. There was no problem with unwanted noise or pollution from cars or rubbish. We had peaceful evenings and weekends to spend in our garden. Our garden is quite some way back from the front street and is a haven from the noise and traffic pollution of the front. We are opposed to the site being used for the purpose of travellers and are extremely worried about the noise and upset this could cause my wife and I. We are in the twilight of our lives and in poor health and in need of the peace the rear of our house brings both the garden and the rear bedrooms where we sleep to escape the noise from the front. I appreciate we have the option to sell up and move to a quiet location, but this is not something we could cope with at the present time and if your plan goes ahead the value of our house will drop so far we would not be able to afford to move in the future. My wife and I have worked all our lives, and paid tax, we have raised 5 children who all, have jobs and pay 40% tax, we also have 8 grandchildren, 4 of whom are grown up and pay tax, two of them at 40%. We feel very strongly that we have done more than our bit over the years to support both our Country and our community; we would like some consideration at this time in our lives. Apart from the above personal concerns, we also believe that the site would not meet the needs of the travellers, the area is too small and access is near impossible. There would be Health and Safety risks on the site that concern us, if a fire were to break out our property could be affected and as we all know a Fire engine could not get access to the site. This planned proposal is both unfair and unrealistic for both the residents and the travelling community; we implore you to rethink this proposal.</p>	
39	Totally against the potential redevelopment due the impractical location	se13 7hu
40	Opposed on the grounds that the site is not suitable. Access is a problem, the site is on the flood plain, it's too small a site for many caravans, the main road is already congested so further traffic joining the main road from Church Grove will exacerbate the problem.	SE13 7JU
41	The proposed site is clearly not accessible for caravans. The width of the road is too narrow for caravans to access without either removing all the cars or mounting the very narrow pavement. The inconvenience caused would be immense and the safety risk to residents is high. The turning circle at the end of the road is very tight and the risk of caravans getting stuck is very high, potentially blocking access to three or four homes. As a car driver who regularly accesses that street to visit my parents, even I have trouble trying to park my car in such a narrow road and find it difficult to turn my car around at the end of the street.	se41jn
42	The site itself could be perfect for travellers; however the road leading to the site is a narrow pass that would struggle to accommodate both local residents parking facilities and intense passing by traffic. This will create problems not only for residents but also for the rest of the local community due to traffic blockages on a road.	se13 7uz
43	It is not suitable. Not only is the access width an issue for the typical traveller caravan, but the site is very small and I believe it will quickly be occupied by a great number of vehicles and residents than it can reasonably take.	SE4 1QD
44	Response on Consultation Having attended the meeting at St Mary's Centre on 6 December, I am aware that the Council are currently unsure whether Church Grove will be wide enough for the caravans and is currently carrying out other investigations. If	se13 6qz

	<p>Church Grove proves to be wide enough for the vehicles, I would be grateful if you could consider three other issues before making a final decision: 1) Will the traffic flow in Ladywell Road be disrupted when caravans enter and leave Church Grove (e.g. will traffic have to stop to allow large vehicles in and out). Congestion and queues near Ladywell station are already having a significant knock-on effect on the A21 so I am concerned that problems at the entrance to Church Grove could make this worse. In particular, I am aware that TFL and Lewisham Council are struggling to resolve the dangerous situation for pedestrians at the entrance to Courthill Road because of the importance that they place on keeping traffic moving on the A21. Would going ahead with the Traveller reduce the chance of a solution for Courthill Road? Has TFL been formally consulted about the Council's plans for Church Grove prior to a decision being made? 2) When the Council looks at available spaces in the borough, does it ever consider whether the land that it currently uses for 'council activities' could be used more efficiently? Has all of the council's space been externally reviewed/audited (even if it is currently being used) to determine whether space could be used more effectively if 'everything was on the table'. Having looked at Wearside Depot from the train, it does not appear to be efficiently used. For example, there are a large number of private cars parked there during the day by council employees. Are council employees offered parking on-site and, if so, is there any justification for this given the cost and scarcity of the land in Lewisham Borough? Could this land be released? Similarly, could space be changed to accommodate 2-3 storey buildings rather than just on one level to release space. If land could be used more efficiently on council-used sites, it is possible that a more suitable site could be identified for the Travellers on existing Council land (e.g. places like Wearside depot or the Surrey Quays Waste Disposal site?) where this better access. 3) Given that the railway land is so close to Wearside and inaccessible from anywhere else, could land be rented and used by the Wearside depot - hence releasing other land for the travellers?</p>	
45	<p>The site has massive access issues. For Travellers to access their area with caravans a big operation will be needed to move all the residents' cars. How will you do this? Every time? Can you guarantee everyone's safety? Can you guarantee that the cars will be protected? This is just a recipe for conflict in my doorstep. NO ONE WANTS THIS. The site is also no in keeping with the local conservation area.</p>	se13 7ut
46	<p>The site has massive access issues. For Travellers to access their area with caravans a big operation will be needed to move all the residents' cars. How will you do this? Every time? Can you guarantee everyone's safety? Can you guarantee that the cars will be protected? This is just a recipe for conflict in my doorstep. NO ONE WANTS THIS. The site is also no in keeping with the local conservation area.</p>	se13 7ut
47	<p>As a resident of Malyons Road, Lewisham, I would like to voice my support for the proposed redevelopment of Church Grove. All councils have an obligation to provide appropriate sites. There is nothing inappropriate about the Church Grove site, and I believe it should be used for this purpose. Dr Ben Pitcher</p>	SE13 7XF

48	<p>Whilst travellers have some rights to a site, I think that Church Grove is unfeasible because of health and safety risks to Travellers and residents of Church Grove. I refer you to the web site www.savechurchgrove.com for details of these risks. Please consider all the information on this web site as reflective of my own personal views. This means that I do not have to waste more time repeating what I have said many times before or cutting and pasting from the web site. Without going into the technicalities - these are available on the web site however - I consider the way that Church Grove residents have been treated by the Council both last time this site was proposed and this time, to be appalling. I am a local resident and my health has suffered as a direct consequence of the stress that this has brought about both last time and now again this time. It is important that this is taken into account along with the destruction of the local community that it has caused. I feel that residents of the street were literally just starting to recover from the previous proposal and beginning to organise social events together - something that had completely stopped, when we heard from a reporter that it was all on again and that there was a Mayor and Cabinet meeting in 2 days time. Since then (in October) - residents in the street have had to fight against what we believe to be completely wrong. This has been time-consuming to say the least and hugely stressful. Residents have jobs and other responsibilities they have to focus on. Residents are not immune to other stresses - such as redundancy, serious physical ill-health and stress-related conditions - all of which are going on at the same time and are worsened by the appalling lack of respect the Council have shown us. Some examples of this are (in no particular order); Council staff making suggestions of racism and "nimbyism" to individuals (especially during the last consultation), Not sticking to promises made e.g. that Church Grove would not be considered again for a Travellers site and we would be informed if there was any change to this, taking away our parking bays just before the new consultation started and delaying on re-painting them. Once repainted, we discover that are clearly narrower than previously - very underhand. Not only that, when re-painting, we were not notified in advance by any means and a crane was sent along to lift each car up to paint around it, without owners' permission. Never mind a lack of respect, is this even legal? An indifferent response to the fact that residents have pointed out that inaccurate information has been used to justify the whole proposal and consultation - especially regarding the widths of caravans and mobile homes used by travellers now and in the future - no apology and no amended letters sent out. Not meeting a simple request made by residents to move the public meeting as it clashed with another local meeting - (Ladywell Assembly) which prevented residents from attending the second meeting and others from attending the public meeting. - this has been acknowledged now by Damian Egan, but as there seems no justifiable reason not to have changed the meeting time in the first place, this is another example of the lack of respect towards us. It would seem that the day after the public meeting - where local residents and everyone else present were in opposition to the idea and was obviously very stressful for local residents - Damian chose to show the Traveller Liaison Officer around the street. This beggar's belief - can it not be appreciated just how stressful this is for local residents? As I understand, he did not contact anyone in advance about this - which is strange as there has been a lot of liaison about other arrangements. It shows a massive lack of sensitivity in my view - we are local people who vote and expect our Councillors to support us as local citizens. Information has not been openly shared with us. There is a lack of transparency. Responses to Freedom of information requests are delayed. Steve Gough is not prepared to share the draft Access report with us - even to the extent of indicating the conclusion of it - presumably the main findings and conclusion are not going to significantly change between draft and final version? This just adds to the stress experienced by local residents. We have felt insulted by the lack of common sense, the very poor statistical justifications and the inept reasoning that</p>	SE13 7UU
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	<p>has been applied to this whole issue. Why on earth was access to the site not considered before carrying out (a very inadequate) options-appraisal on potential sites - as, if access is not feasible then all the other criteria applied are invalid. But no, an (inadequate) options- appraisal is carried out first and low and behold Church Grove gets full marks! This then rules out all other options and the consultation process is applied only to Church Grove. Oh and then it is thought useful to carry out an Access assessment to see if caravans and mobile homes can fit down the street -insulting and again hugely stressful for residents. The recommendation of a previous independent Consultant, of Lawrence House car park being the preferred option, was declined by Lewisham Council. We were informed it was because the Travellers did not want to go there. It is insulting to us, as human beings, that their views can so easily alter the final decision; going against the recommendation of an expert paid for by tax payer's money, yet our views seems to count for nothing. Residents were encouraged by the Council, following the turn-around the last time this was going ahead (i.e. Travellers suddenly decided they wanted to be housed instead) - to pursue their idea of a temporary Community Garden on the site, to the extent of carrying out a lot of preparatory work and gaining written support from local primary, local secondary schools and local nursery, stating that they would be able to put the garden to great use in the school curriculum. The Council then at the last minute pulled the plug on this, without a proper explanation. (It has never been clear what prompted the Travellers to change their minds about wanting a site and preferring housing - we had wondered if they were given a financial incentive, which might explain the change). The fact that Church Grove is a key part of St. Mary's Conservation Area, seems to count for nothing. On the one hand, the Council produce a lovely glossy brochure about it and impose specific requirements on the home owners of the mid 1800's 2 bed cottages that we must comply with; then on the other hand are happy for the very narrow street to become the driveway for mobile homes, travelling caravans and large vehicles for the Travellers site - ridiculous! There has been some suggestion that the parking bays in the street may be removed if necessary - yet another example of the lack of respect towards local residents. It is not even clear if doing that will mean the road is wide enough for mobile homes anyway. If it was, then local residents lose parking (paid for by annual permit) to allow for mobile homes, caravans and large cars/vans belonging to Travellers - our parking would be taken away to allow access for the Travellers' to park their vehicles in their dedicated spot which will be provided for them! I could go on and on and on - it is a disgrace and this whole process should stop and be replaced by something much more robust and unbiased. An independent Consultant should be brought in to do this, not answerable to Lewisham Council. This has all been a shocking waste of time and tax payers' money. I am sure the Press (in its many forms) will be very interested in these points. I believe you are meant to be taking into account the views, needs and welfare of local residents in such a plan. In respect of other potential sites - I think the one's put forward should be looked at again using a better set of criteria and using a more sophisticated approach where Access is fundamental to process. I think that access should be looked at, not only on what current caravan/mobile home widths are but also taking into account future trends for larger vehicles - as all vehicles are getting bigger not smaller. My knowledge of local sites is limited to what is publicly known so it is difficult to comment on specific sites. I suggest an independent review of the sites by someone not answerable to the Council, to ascertain the specific merits and constraints of the various sites. I trust I have made my views clear.</p> <p>Â Â Â</p>	
49	<p>people should be aloud to live like the settled community. as many travellers like myself are very stressed and don't want to live in houses. and would like to live in a sit with other travelling people. and not judge for what they are. and where or how they live.</p>	se26 4su

50	<p>Response to Consultation regarding former Watergate school site for Travellers I object to these proposals under three main headings 1) Access and Planning Guidance 2) Consultation/Communication and 3) Use of Taxpayers' money and alternative uses for the Site. Access and Planning The report sent before the Mayor and cabinet on October 6th was very poor. It failed to even mention access. Church Grove should not have even made it onto the shortlist of seven sites (let alone come top of the matrix of sites) because it fails to meet the basic Government planning guidelines for building a Traveller's site. Please look up section four of guidance for design of sites for Gypsies and Travellers DCLG 2007. Church Grove fails four guidelines on access which the document says are essential the 2 most relevant are the road width should be a minimum of 3.7 metres and all roads must allow easy access for emergency vehicles. Without removing residents car parking the carriageway width is 2.6 m. Removing parking altogether in Church Grove would be a serious loss of amenity to residents of CPZ B. In the misleading letter sent out to begin the consultation it mentions that Traveller's touring Caravans are 2.2m wide. Residents of Church Grove know that in fact they can be up to 2.55m width, not accounting for wing mirrors. This is not possible to get down the street without mounting the narrow western pavement (0.8m.) Another factor is gaining access to Church Grove from Ladywell Road, difficult enough in a car without mounting the pavement or swinging onto the opposite carriageway, let alone a caravan towed by a large vehicle. Safety of pedestrians on Ladywell Road and Church Grove will be compromised if these proposals go ahead as planned. Other planning guidance ignored pertains to : not building a site on a floodplain. (Remedial work proposed to raise the site by 1 m increase the flooding risk to existing residential properties nearby) :Contamination. No proposals to remove the contamination. :Conservation Planning rules. This proposal flouts Lewisham planning guidance for the St May's Conservation area in so many instances. Please look up the planning guidelines and adhere to them. :Noise. Adjacent to railway and council depot. Also plans show that the proposed pitches abut 3 properties 11 and 13 Church Grove and 57 Ladywell Road. The manager of the site in Hackney visited by some residents said there should be a buffer of 3 metres around a site for safety in case of fire or emergency. With the flood buffer insisted upon by the Environment Agency would the site be viable for 5 pitches. Consultation and Communication The manner in which residents found out about this proposal can be described in no other terms than a disgrace. This has resurrected feelings in the community that this process is a farce and that the decision to use this site has already been made. The fact that that consultation with the Traveller community had begun in June with no such consultation offered to Church Grove and Ladywell residents is biased and unfair and leads one to the opinion that this is not a fair and balanced process. Lewisham council also failed to show a need for this site with the meaningless statistics contained in the Mayor's report. (11 responses from 490 proves nothing). Why can the residents not see the interim transport report? Is it a case of changing the report until it says what the council wants? Value for money and Better Alternative sites Five pitches on a valuable central site like this is not good value for money. Apparently it may house just one family for a cost of 1.8 to 2 million. As these families are currently housed, would this money not be better spent on providing homes for the 18.000 people currently on Lewisham's housing list? In conclusion this site should not have been included on the site selection in first place because of access. The other sites with better access should be revisited. Most favourable would appear to be the Catford Dog track site, which is much bigger, has proper access and the site could be included in a new development, which is the Government's favoured policy. The Watergate site has much more potential for housing, sheltered housing or educational needs in these difficult financial times.</p>	SE137uu
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51	Inappropriate and tiny site. Â Difficult and dangerous single access and exit. Â Poor information to and consultation with affected residents whos views have been ignored or dismissed	se63nx
52	I think it is a very bad idea. The access to the site is clearly not suitable for large vehicles. The site is way too small to meet the needs of the gypsy/traveller community in the borough (by the Council's own estimates), so would be no more than a token gesture. We all aim to be inclusive and non-prejudiced but it is a fact proven by experience that gypsy/traveller sites are much for successful for ALL concerned when they are slightly apart from settled communities. The lifestyles are different. I am not a property developer but it seems to me that there are numerous sites more suitable in the borough - bigger, better access etc eg the area of vacant land next to Sainsbury's Bell Green, the large vacant plot behind Laurence House, the plot at the corner of Baring Road, numerous underutilised small industrial estates that could be converted and made suitable for residential use.	SE23 2JB
53	It seems utterly crazy to propose this use for a site in a central location close to good transport links, in a conservation area, in a residential neighbourhood and with very poor access. A medium density, car free residential development as on other nearby sites in Ladywell would appear to make good use of the potential of the site without imposing unreasonably on the access, the neighbours or the conservation area. The council is not obtaining good value from the site landing the travellers with a long term access problem, compromising the urban design of the area whilst antagonizing the adjoining owners. No good will come of this idea and an opportunity is being lost.	Previous resident of Church Grove
54	I support the provision of a travellers site in the borough, but not in Church Grove (the old dog track site in Catford would surely be better). The road is too narrow for travellers caravans and for emergency vehicles, it is in a conservation area and costs too much at a time of budget cuts. I also object to the heavy handed approach of the Council to this proposed development and the lack of communication and engagement with residents.	SE23 2AR
55	Location choice seems not thought through. As a local resident the street is now and straight off a very busy road where traffic is often bad a rush hour. Being a relatively new residents to the area, this needs serious thought and if it is to go ahead more information needs to be given to state the facts as lots of hearsay is about. Overall against, but only because I do not have all facts.	SE13 7AN
56	I strongly disagree that this is a suitable site for accommodating a Gypsy and Traveller community.	SE13 7AW
57	Inappropriate - the traffic will increase, and based on previous sites there will be rubbish and waste all over the site	se13 7at
58	I feel that looking at potential sites considered this is not the ideal site. The road that leads up to the site is very narrow and although it is stated that "vehicles will rarely travel in and out of the site" any movement into and out of the site would be likely to involve cars on the street being moved out, which would lead to annoyance and animosity between existing residents and the new residents. The sites either at old Deptford Green site or Catford Dog track would seem much better for movement of vehicles in and out. Additionally, as other local building projects (i.e. redevelopment of Ladywell Police station) had it made explicit that there was to be no parking on-site nor parking permits for any of the residents of the new site, it then seems unreasonable that a newer local building project will have parking, etc.	SE13 7UW
59	I am in favour of the proposal.	SE4 1YR

60	I am strongly opposed to the Council's plans for a traveller site at the end of Church Grove. I think this constrained site with inadequate access arrangements is unsuitable for the proposed development and I urge the Council to look again at alternatives in the Borough that will better enable it to deliver its statutory obligations. I am appalled at the way Church Grove residents have been treated, having been told in the last year first that they could set up a community garden on the site, then that the site would instead be put to educational use. News that the site had once again been identified for a Traveller Site is a complete shock. The Council has conveniently ignored the access shortcomings and other suitability issues in national guidance and the fact that 5 units will go no significant way to meet the Council's own assessed demand for a minimum of 17 units by 2012. Inexplicably consultation is only taking place in relation to one site, the smallest of the seven: if in reality this has already been chosen why insult residents with this charade of consultation?	SE13 7DG
61	Its access road is too narrow for towed caravans. The site is too small for the number of pitches needed.	SE13 7XE
62	I am against it. The site is not accessible - the road is too small and narrow. The site is surrounded by historic houses and is not an appropriate site.	Se137ag
63	I think it is very important that every London borough provides good quality sites for gypsy and traveller communities.	SE4 1UN
64	I strongly disapprove. The site is inappropriate and the council really need to give the residents down there a break from years of hassle. An apology would be a great start. Then find the travellers a site that is far more suitable. This seems like desperate box ticking and is an insult to local residents and the traveller community. Both deserve better treatment.	SE13 7HZ
65	I would like to register my opposition to the proposal on several grounds, all of which have been well documented by fellow opposers and in commissioned reports. 1. Access considerations - see Sanderson Associates report. 2. Health and Safety - the site is bounded by both a railway and a river. Latter poses a flood risk. 3. Conservation issues - documented in solicitor's report. 4. Assessment of needs - documented in solicitor's report. 5. Expense - vast sums of tax payers money being expended which could be put to better use. 6. Flawed consultation process - also documented in solicitor's report - inaccurate published information, information withheld. 7. Alternative uses of the site which would be more appropriate eg. primary educational/nursery sheltered/elderly housing community garden	SE13 7UU
66	I think that a small, residential cul de sac with narrow access onto Ladywell Road, which is frequently blocked with traffic, is a poor place to site a travelling community. They will necessarily have large vehicles coming and going. This will make life difficult for them and for the residents in Church Grove and probably lead to conflict.	SE 13 7AW
67	Why not haven't they got the right the same as anyone else in the borough to provide a stable life for their children. I think the site is a great idea. There is a lot of rumours going on about caravan sizes and how unsuitable they are for that road if this is the case why not just put in little cabins the same as was in Lewisham before then? Gypsies or not every one has the right to be treated fairly. The main problem here I see is that residents are worried about the prices of their homes decreasing and not what is good for their fellow man. I find this to be discriminating	se137jj
68	The access to Church Grove is very narrow so any large vehicle would need to take a wide sweep (ie, across the opposite lane of traffic) and disrupt the existing poor flow of traffic. Should an emergency occur fire tenders would not be able to enter the site due to the restricted width, thus putting life and property at risk.	SE4 1JX

69	<p>I think that although travellers do require places to stay, they should be on sites that do not interfere with other residents. I have watched over the years at Lewisham station the mess that the travellers left when they were housed near Matalan and the council did nothing to clear this up. It was an eyesore and a health hazard and you are asking people to now live next to that. I don't think a traveller site should be situated in a residential area, the council is forcing this upon the residents of Church Road and the stark facts are that they will no longer be able to sell/rent their houses because no one is going to want to buy a place or live that near to the traveller site. While travellers have every right to live how they chose, this should not be forced on anyone else. The area that the travellers have been moved from was ideal as it was in an industrial area and did not interfere with people who did not approve of the traveller's way of life. The fact is that the council saw a potential for making money by developing that area previously used by the travellers and have not given any thought to where the travellers should go. It is pure greed that motivated the council, not once did they think of the people, residents or travellers.</p>	se13 7xq
70	<p>Impractical and poorly reasoned. Dangerous access issues for settled and travelling community who both deserve better. Access issues will impact traffic flow on Ladywell Road - already a nightmare at peak times. Lewisham in desperate need for green/social/sheltered/disabled housing - this site would be much better suited to this purpose as access issues would not arise. Or better still - use for educational purposes - Labour promised to retain educational land for education use - don't make this an empty promise! Lewisham Council is not following Conservation Area guidelines, nor government guidelines for Gypsy and Traveller sites. Traveller site located on Church Grove is an expensive option that benefits no one.</p>	SE13 6JE
71	<p>travellers need to travel yes it fine to settle for Christmas .or have a permanent plot in a site .but you need answers to travellers settling here there and every where . answer you need lot of transit site that you can only book your family in for 1 or 2 weeks then they can go to another one for a week or 2 less wasting money on tax payer this way</p>	
72	<p>Validity of the consultation I refer to the Report entitled Travellers' Site - Needs Assessment and Site Consultation which recommends consultation with the residents of Church Grove site. The document is not one of consultation as is stipulated since it is stated (point 2.3) that the purpose of the report is to " agree to consult on the Church Grove site as the preferred site to meet" To agree to consult implies that the original planning application made in 2008 and the abandoning of that proposal (Steve Gough's letter to Simon Raper dated 30/11/10) is being resurrected, particularly since there is no new consideration being given to alternative sites. Therefore, Church Grove cannot be preferred over others until a full consultation is carried out. The situation now is different from that of 2007/2008 and this changes the basis of any consultation. It also implies that there is pressure to meet a deadline of April/May 2012 which would necessitate a side-stepping of adequate wide-reaching consultation that a proposal of this nature requires. Had Lewisham Council acted in good faith in its consultations with all residents of Church Grove and the surrounding area it would have provided a wide range information at the drop-in sessions, have given answers to questions in an unambiguous way and had more officers of sufficient seniority with a breadth of knowledge available to demonstrate its commitment to the involvement of local people. In 2007 residents were invited to an exhibition of the planning proposal and to meet officers, architects, management services, travellers liaison officers, and an independent advisor/trainer. The deputy mayor was also in attendance. Having been told clearly and unambiguously that the Planning Application would not be renewed, the Council ignored its own recommendations that residents be involved at a very early stage (Statement of Community Involvement) and allowed Church Grove residents to learn about the resurrection of the plan by way of a local journalist, thus giving us two days</p>	SE13 7JU

notice in which to get ourselves informed and involved. Government Circular 01/2006 states that the interests of the settled community have to be respected in the planning for traveller sites. As a community we have carried out many of the responsibilities the Council has in affording that respect. This would include the demand for a public meeting, research into caravan widths, legal requirements for road and pavement widths, vehicle access assessments, meeting with travellers, regulations on fire and emergency services involvement in planning and providing information to the wider public of Ladywell on Conservation Area obligations. In our attempts to ensure that the Mayor is presented with a fair and accurate representation of residents' views upon which he will make his decision whether to proceed or not, we have been forced to demand co-operation when it has not been forthcoming; hardly affording the respect we are entitled to. I therefore challenge the validity of the Consultation is on the grounds that accurate, up-to-date information is not provided to the public upon which it can make informed comment. In saying that, the Church Grove community has got itself informed and my response is based on that. Access The problem regarding access was highlighted during the previous consultation process 2007/2008 and no updating of information nor research had been done when the Report was presented to the Mayor and Cabinet. The validity of the consultation can be challenged on the key point of access since no assessment had been done and yet was used as a determinant in the list of site options, thus distorting the weighting. Had this be included and the emergency services consulted (which they were not) it would have made clear that the accessing to the site by vans towing caravans puts pedestrians at risk and disrupts traffic flow in a busy main road, assuming of course that there was no illegal parking at the junction of Church Grove and Ladywell Road when access would be impossible anyway. As this is the only point of access to the proposed site (against DCLG guidance on planning traveller sites) I am left wondering why this particular location is tailored, in the report to the Mayor, to the perceived need for a traveller site at all. Pedestrians would be put at risk at several points. Ladywell Road is used by people walking from Ladywell Station and Ladywell Village, being particularly busy at peak travel times in the evening. There is a bus stop immediately opposite the entrance to Church Grove which services four north bound bus routes. Access assessment using the current measurements for most widely used caravans indicates that towing vehicles may well need to use the lane in which buses stop in order to manoeuvre and would also approach pedestrians waiting at the bus stop itself. In not bringing itself up-to-date with information on caravan widths and the legal requirements under EU law changed in 2010 for towing vehicles, the consultation makes a nonsense of the Council's duty to make informed decisions in the interests of both travellers and the existing community. It adhered to 4.5 year old figures regarding caravan sizes, as well as the vague, unsubstantiated comment that Lewisham travellers rarely travel. It cannot, and should not, be stated as the November letter to residents does, that static caravan movements would lead to "limited inconvenience to residents". This simplifies and underplays what would be a major disruption to all users of Controlled Parking Zone B, not just Church Grove residents as stated in this letter. The term "in reality" is used in this connection when the Council cannot know what the reality is or likely to be in future. Half of the houses in Church Grove are fronted with small gardens and an illegally narrow pavement. The residents of these houses, including young children, are required to use the road to walk along. It is here where it is necessary for vehicles of 2.6m and above to mount the pavement in order to complete their journey and where wing mirrors are at adult head height. The 2.6m measurement does not include wing mirrors - essential when towing. Photographic evidence shows that the road camber can, according to the vehicle height, add to the risk of possible impact. An access assessment would have revealed these dangers. Needs Assessment The letter dated 4/11/11 circulated to residents

outlines briefly Lewisham Council's duty under the Housing Act 2004 to undertake regular assessments of gypsies and travellers accommodation needs. Had these assessments been carried out regularly it would have been known exactly what the need was without resorting to the commissioning of an independent needs assessment upon which the decision was taken to build a site for travellers and to hastily consult'. The letter goes on to refer to "a site search undertaken earlier this year which resulted in a shortlist of seven sites". This is untrue and simply a regurgitation of the site search made in 2007. If it had been conducted as was said the Council had a responsibility to inform residents, which it did not. I refer now to the Report to the Mayor and Cabinet dated 5th October 2011 in my response to the needs assessment. The acknowledged fact (point 6.2 "The aim of the study was to establish links and to engage members") is that regular assessments of accommodation needs were not carried out as stated in the same letter. It would seem that since the original five families from Thurston Road had relinquished their licences, travellers remaining in the Borough were housed in social housing or privately rented accommodation. The commissioned assessment of needs report is based on flawed and poor research. It is acknowledged that there was difficulty (point 6.4) in determining the number of traveller families in the Borough and of the approximation of 100 families, 12 engaged in the survey. Of these three were satisfied with their current accommodation, six were unsatisfied but not because they were living in bricks and mortar and three said they were experiencing health problems due to living in housing. Whilst this may be of concern it cannot be the basis of an informed choice to provide between four and nine pitches. As the Report says demand does not equate to need. I can only conclude from this that the pitches are intended for transient travellers with a need for pitches, with the consequences of increased traffic movement along Church Grove, difficulty in site management and the building of relationships with the settled community. Conservation area considerations Drop-in sessions and the public meeting did not disclose in full detail the relationship between the proposal and the fact that the site is located on the boundary of St Mary's Conservation Area. The only reference to it was on an A4 sized sheet showing a map. This was left lying on tables alongside site plans which in themselves gave no indication that the CA boundary existed at the entrance to the proposed site. I requested at all sessions involved in the consultation that this be included since the Council's own Planning Policy contained in the St Mary's Conservation Area character appraisal states that the Council "has a duty to pay special attention to the desirability of preserving or enhancing the character of such areas". It would seem that by this action the Council is absolving itself of this responsibility and in so doing ignoring central government's planning policy in relation to conservation areas (PPS5: Planning for the Historic Environment). An example of the inconsistency in the Council's attitude to planning can be illustrated in the case of Riley's Pool Hall site. Here a planning application was rejected on the grounds that it "failed to respect the character and appearance of this part of Lewisham High Street" even though Rileys is outside any Conservation Area and is not on the boundary of one. When asked, planners were unable to say how exactly a site for travellers would enhance the CA. Whilst this omission may not be unlawful it again represents a disingenuous attitude towards community involvement in what happens in its locality and the duty it has to respect the needs of the settled community of Church Grove. Community Cohesion The Council must have due regard to the need of "foster good relations between people who share a protected characteristic and those who do not" (Report to Mayor and Cabinet dated 5th October 2011, point 12.4). Fostering good relations begins with the building of trust. Lewisham Council officials have shown the settled community little regard since this current consultation began nor for that matter during the original planning application. We were not informed directly that it was to be discussed at Mayor and cabinet meeting, learning of this from a newspaper reporter after we had been told in writing that the

	<p>Council had no intention to implement or make any application to extend the existing planning permission in November 2010 as previously stated. Lewisham Council's Statement of Community Involvement, under Planning Applications (Point 6.2), states "pre-application discussions can provide considerable benefits in the form of establishing goodwill where the community are fully informed and feel that a proposal has taken into consideration things that matter to them." When questions have been asked about things that matter we have frequently met with shoulder shrugs, vague answers or told that it's only guidance not a requirement. This happened with a question raised of the absence of a fire break around the perimeter of the site which is a requirement and not for guidance only. This is a model of how not to build a solid base on which to build harmonious relationships. The harmonious relationships required for two cultures to share common space is put at risk since I have no faith in the Council's willingness or ability to provide strong management of such a site. I witnessed this in Hackney when it was demonstrated that with the consistent presence of management on the four sites, an engendering of trust between travellers and management occurred . This, and excellent vehicular access contributed to the success of the sites for both travellers and the surrounding community. The problems associated with the narrowness of available road space in Church Grove will inevitably lead to stressful situations especially when caravan movements could be greater in number than anyone can predict with any accuracy. There is no room for chance in the building of a site for travellers on any site in Lewisham. The evidence shows that when such a site is put in place before the surrounding area is developed a successful outcome is much more likely. For this reason the former Catford stadium area which will be developed at some stage, would be much more suitable and the Church Grove site used to meet a clearly defined need. This exists in the Borough without suggesting that people from outside of it are invited in. I urge much more careful consideration of this proposal and that the Council acts responsibly. Jan Cook 15th December 2011</p>	
73	<p>À Terry Edge 9 Church Grove London SE13 7UU À 15th December 2011 À CHURCH GROVE TRAVELLERS' SITE CONSULTATION Please note: I enclose with this letter a copy of the transport report by Sanderson Associates, commissioned by the residents of Church Grove. Their comments are submitted on our behalf as part of this consultation. The Council will also be receiving a report by Boyer Planning, also commissioned by the residents, and submitted on our behalf. In addition, we have been receiving advice from Irwin Mitchell Solicitors, whose early advice is that the planning permission is no longer appropriate, also that the consultation process is seriously flawed and should be at the least re-started. My comments are as below. 1. The previously granted planning permission is no longer appropriate Irwin Mitchell's advice to us is that the Council has only limited scope for revisiting the previously granted planning permission, i.e. it has a duty to reconsider the desirability of implementing it so long after it was granted when circumstances and knowledge have changed. The previous planning permission was granted for known traveller families, living at the Thurston Road site, who had to be re-housed due to the fact the Council's plans for regenerating Lewisham involved demolishing their current site. During the consultation and planning processes, the Council constantly assured Church Grove residents that these particular families had needs which were less onerous than travellers in general, e.g. that they did not travel; their caravans were small; there were no men (i.e. no commercial vehicles entering and leaving the site on a regular basis - although in fact this wasn't true); that Church Grove was better suited than the Council's consultants' first choice - the lorry park in Catford - because these travellers wanted to be closer to their current amenities. But those traveller families gave up their traveller licences and therefore the need disappeared. For this current proposal, the Council has no idea which travellers will be living on the site. Therefore, all their previous arguments against access etc problems - which</p>	SE13 7UU

Church Grove residents didn't accept in any case - clearly now count against Church Grove being a suitable site. Yet there is no evidence in the Council's reasoning for Church Grove to be again the preferred site that this has been taken into account. The key issue of access - which the Council has subsequently admitted, and the Mayor agreed, is a major problem - 'answered' simply by saying that the previous planning permission (dealt with it). 2. The Council has broken its promises to Church Grove residents. After the Thurston Road travellers sold up their rights, Steve Gough informed residents that the then existing plan for Church Grove was no longer required; that planning would be allowed to lapse; and that any further plans for traveller sites in Lewisham would have to be assessed under new criteria for a new planning permission. He also promised to inform us if this changed. He broke this promise by not even telling residents that the plan was being re-proposed to the Mayor: we only found out because a reporter told us two days before the Mayor's meeting to agree the proposal. Once again, and despite the lessons of the previous process, the Council is in breach of government guidance (DCLG) to consult both the traveller and settled community early. Despite knowing how stressed residents were last time, on only hearing of the Council's plans when a letter dropped through our doors telling us the consultation was on, it planned to do exactly the same thing again. Also, the Council's current consultation letter states that it still has permission for the old plan. How can the Council claim - as it appears to be doing - that one planning permission is good for both plans? This is clearly absurd. In other words, the Council is claiming it has planning permission for a site based on now defunct needs. This clearly means the plan is defunct. In short, the Council allowed planning permission to lapse because it no longer required Church Grove for the previous purpose it said existed. It's asking residents to believe it then instigated a new search for sites based on new criteria and that it's nothing more than coincidence that the final figure of required sites - 5 - is exactly the same for both needs assessments! Further support for our belief the Council no longer wanted Church Grove for a travellers' site was supplied in this email: Fri 13th February 2009 Email from Heidi Alexander (then Deputy Mayor, now MP for Lewisham East) Dear Simon Â I am sorry not to reply to your email sooner. I had a meeting with some of your neighbours this morning so it may be that an update has already reached you but if not, the summary is as follows: Towards the end of last year the travellers living on Thurston Rd expressed concerns about moving to a new site on Church Grove and asked the Council if it would consider terms for the surrender of their licences. The travellers, with legal representation, agreed terms and vacated Thurston Rd at the beginning of this month. The Council is now undertaking a site search for an alternative single site of a minimum of 9 pitches and the results will be reported to the Mayor when it is completed. Â Whilst I can't guarantee that a site won't be built at Church Grove (as it will be considered as part of the site search), the need to relocate the long-term residents of Thurston Road due to the town centre redevelopment plans no longer exists and as such some of the factors that affected the selection of Church Grove as the council's preferred site are no longer relevant (i.e. the need to keep the site in the vicinity of Lewisham town centre and the need for a site that could be delivered quickly). London-wide research has also been conducted which suggests that Lewisham requires a minimum of 9 traveller pitches (as detailed above) and this number of pitches would not fit onto the Church Grove site. Â I am sorry I can't provide any more definitive news at the moment. However, at the meeting this morning we did agree that the council would keep resident representatives updated as the site search progresses. Â Yours sincerely Â Cllr Heidi Alexander Deputy Mayor and Cabinet Member for Regeneration Â This clearly shows that the Council thought Church Grove was no longer suitable for a site because the original traveller requirements had changed and because they now needed a site for 9 pitches. It also acknowledges that some of the factors that made Church Grove the preferred site before

no longer existed - yet the Council is still claiming that Church Grove is the first preferred site! Previously, as already stated, the lorry park in Catford was actually scored first, which raises the obvious question of how it's possible for it not to be first again especially in light of Church Grove's now reduced special considerations.

3. Planning permission showing as 'withdrawn' from the Council's planning website, re-entered some months later as 'granted' We believe this may be illegal, and certainly at least raises residents' and other stakeholders' legitimate expectations that the site was not going to be used as a Travellers' site. We know of two residents close to Church Grove who bought properties recently on the basis that their searches showed this permission had been 'withdrawn'. Clearly, this is the very opposite of early consultation.

4. Consultation process flawed, mismanaged and deceptive The consultation letter refers, again, to traveller caravans being only 2.2m wide. When the Mayor visited Church Grove recently, Steve Gough publicly apologised to the residents for getting this fact wrong - he accepted, in front of the Mayor, that Traveller caravans can be up to 2.55m wide with another 0.5m required for extended wing mirrors, and promised that he would instruct his officers to stop informing people at drop-ins wrongly. Clearly, therefore, the consultation is flawed: stakeholders have not been told the full extent of the key problem. The consultation letter has not been reissued or even amended, and the Council's website has simply removed the relevant section, i.e. so there is now no mention of access at all. The consultation letter states that as residents' questions are raised they will be put on the Council website. However, at three days before the consultation closes there are no questions on the website, despite dozens having been raised in writing and at drop-ins/meetings. Also, at the first drop-in session, Steve Gough promised to answer residents' questions during the process: to date, he has answered none of them. This is gross misconduct on the part of the Council and Mr Gough in particular. At the request of the Mayor, Steve Gough has commissioned an independent report into road issues around Church Grove. When asked at the last public meeting why he has not re-started the consultation or at the very least amended it, he said he was waiting for the results of the report. Apart from the fact he had had the report for several days at the time of this meeting, this was a clear lie: he had already admitted the consultation letter was wrong. We now have a situation where it looks as if the key information residents need to respond to this consultation will not be made available until after the consultation has ended. This is in breach of government guidelines on good consultation practice. At the time of writing, the residents have requested several times in writing that Steve Gough impart the content of this report but he has not even answered them. Residents will be putting in a formal complaint about Mr Gough's behaviour in this matter.

5. Traveller consultation As said, government guidance recommends early consultation with both communities. Yet it appears as if the Council has not been able to even find any travellers to consult with about this site, other than two ladies who were kind enough to meet some residents just over a week ago. Those ladies did not express any desire to come to Church Grove. Therefore, the Council has failed to consult its intended population of travellers for this site. Given the Church Grove residents have shown ample reasons why this site is not suitable, where is the Council's evidence that the Travellers' community believes otherwise?

6. No Justification/Need Simon Raper, a resident and statistician, has shown in writing to the Council how the Needs Assessment made by Local Dialogue is seriously faulted. The Boyer report says the same. Common sense alone shows that nothing solid can be deduced from only 11 returns out of an estimated Traveller population of nearly 500. In any case, there was very little need (as opposed to wish) shown in even those eleven returns. I believe the Council may also be guilty of misconduct in this respect. At one of the drop-ins, I pointed out to Kplom Lotsu (Steve Gough's assistant) the lack of evidence in the assessment for need. He assured me that, since the assessment was concluded, the Council has been

working hard to find more travellers who want to come to Church Grove. In other words, the Council is trying to stretch what is now a closed assessment - and which the decision to consult on Church Grove was based on - by actively seeking out and persuading Travellers that they should live there! This seems at least absurd, given the huge shortage of housing in Lewisham required by people with a legitimate need. It also smacks of maladministration.

7. Access The Council is well aware of the issue that Church Grove is too narrow to take regular traveller traffic. I refer you to the reports by Boyer Planning and Anderson Associates which fully support the residents' research to show that, for example, traveller caravans are frequently too wide for the available access, e.g. 3.05m (2.55m plus legally required extended wing mirrors at 0.5m) needing to traverse a 2.6m road space (as measured by the Council). Even if a lorry plus caravan traverses the narrow pavement on the non-parking side (0.9m), it will be in grave danger of causing damage to parked cars, fences/hedges, and indeed to residents who step on to the pavement unsighted. The Council has used the argument that its refuse lorry accesses the street and that is 2.5m wide. We have pointed out to the Council, however, that in fact the lorry rarely comes down the street, but stops close to the Ladywell Road end. On rare occasions when it has come further, it has had to drive along the pavement. The point being that it is much easier to control a fixed base vehicle performing such a manoeuvre than it is to control a lorry pulling a large caravan. The argument the Council used in the first round of planning was that the Thurston Road travellers only had small caravans and "didn't travel", i.e. it's not much of a problem. We dispute even this argument, on the grounds that the Council should not be building a travellers' site that curtails their natural right to travel. Also that in any case there is photographic evidence that the Thurston Road site was host to lorries, i.e. that there would have been daily in/out movement of lorries along Church Grove even under the old scheme. The Sanderson report, however, points out that there is likely to be far greater movement of heavy traffic to and from the Church Grove site, to quote: "Evidence accepted by consultant's representing Travellers at a recent public inquiry, Inspectorate reference APP/M2325/C/10/2134060-74 and APP/M2325/A/2134042 was that from figures drawn from the TRICS database system (the industry standard for assessment) a level of 10 trips per pitch was to be expected in a 24 hour period. This level of use is higher than that of a normal dwelling which is in the order of 8 trips and lower, per house per day. As such the 5 proposed pitches would generate 50 vehicle movements per day, all of which traffic would be new to Church Grove." In other words, the volume of heavy traffic along Church Grove is going to be far higher than the Council has allowed for. This will greatly exacerbate tension between the two communities, which of course works directly against government (DCLG) guidance that Local Authorities must ensure the needs of both communities are catered for. Where static caravans/mobile homes are concerned, the Council agrees that these at least will only be able to transfer down Church Grove if the residents' cars are removed. What the Council does not appear to have considered, however, is how exactly these homes will reach the site. We've spoken to a firm which specialises in moving travellers' static caravans and after looking at the street on Google Maps they didn't believe a flat-bed lorry (required for transporting sections that can be 45ft in length) would have enough space to turn into the street or into the site. Therefore, it would be necessary to park the lorry in Ladywell Road, thereby blocking one lane of a very busy road; then unload the static caravan section, which would then block the other lane too. Then it would be necessary to push the section by hand along Church Grove. We have pointed out to the Council that anyone with a zone B parking pass can (and does) park in Church Grove. Therefore, it's extremely unlikely that the Council will be able to contact the owner of every car, each time a static caravan or mobile home is moving into or out of the site. The Council's own needs assessment states that Lewisham travellers have a high degree of mobility. In other words, families will be

moving in and out of the site perhaps up to 5 times a year, which equates to 10 movements of their buildings, each movement requiring two lorry loads. Even if travellers inform the Council each time they want to move, timings can change at the last minute. Also, the Council will have to arrange in advance for residents' to move their cars . Apart from car owners who are not contactable, the Council is being nerve to say the least if it believes every Church Grove resident is going to willingly comply with this regularly-occurring inconvenience. Astonishingly, at the last public meeting Steve Gough, when this point was put to him, admitted 1) that the Council would have to use a crane to lift some cars off the road, and b) that this is an illegal act! Apart from the fact that such cars would in actuality have to be lifted out of the street - since being placed on the pavement will still not provide sufficient access for a mobile home - the Council cannot possibly suggest a solution to a problem with its plan that requires it to break the law! This issue in particular has proved to residents that the Council cares nothing for residents' well-being and is only interested in fulfilling what it sees to be the cheapest and most convenient solution to a piece of land it has spare. Every single person who's seen the street - from Joan Ruddock to guests to the residents' website (www.savechurchgrove.com) - has expressed the common sense view, usually accompanied by a mixture of horror and amusement, that this is a totally unsuitable road to provide access to a travellers' site. We are in the absurd situation where for four years, neither Mr Gough, nor any Council official, nor various councillors, has been apparently able to pick up a telephone and contact a caravan authority (details of which have been supplied by the residents to the Council on numerous occasions) or spend 15mins on the internet to discover that traveller touring caravans are frequently 2.44-2.55m wide and not only the 2.2m that the Council believes (although Mr Gough has since admitted he got this wrong). The situation has been exacerbated by a change in the law in 2010, regarding towing. Before, cars were allowed to pull caravans only up to 2.3m in width. Now, they can pull caravans up to 2.5m in width (as long as they're under 7m in length: longer caravans, preferred by travellers, still need to be pulled by lorries) - bringing the UK in line with the rest of the EU. In other words, there will clearly now and in future be an increase on UK roads of wider caravans, and therefore an increase in these bigger vehicles coming to and from Church Grove. This, incidentally, is one of many changes in situation/law that invalidates the Council re-visiting the planning permission.

8. Conservation The original plan was in clear breach of the Council's own rules for a Conservation Area (which Church Grove is in), i.e. that any nearby developments should be in keeping with the area. Previously, the Council failed to explain how caravans and mobile homes can be in keeping with a conservation area. It promised to spend more than the usual amount of money on making the utility blocks blend in with the surroundings. This time, it has failed to answer whether or not extra funds are still available, i.e. if as is likely they are not, going ahead with the plan will be in even further breach of conservation rules.

9. ROI considerations With the introduction of the Localism Act on 15 November 2011, the Council no longer has a statutory duty to provide traveller sites. By contrast, it does have a statutory duty to provide more sheltered accommodation, for which there is a great and growing need in Lewisham. The Council has been contacted by The Lewisham Almshouse Charity expressing an interest in the Church Grove site being used for sheltered housing. Given the problems of access and heavy rate of traffic which comes with a traveller site (see the Boyer and Sanderson reports), we believe this would be a much more appropriate and needed use of the site.

10. Bad weather dangers One of the many considerations the Council has failed to make is the additional health and safety risks which will arrive with bad weather (see the residents' commissioned reports). Clearly, the access width on Church Grove is already severely limited; and given that a caravan is hard enough to control in ideal conditions, there is a strong likelihood of damage to cars, property and residents themselves from the frequent movement

	<p>of lorries, along with caravans at times, to and from the site. 11. Nuisance of dogs/quad bikes In its firsts set of plans, the Council stated that it would not install a gate across the entrance to the site. Travellers are well known for possessing more dogs than usual, and their children often have quad bikes. Without a gate, both dogs and bikes are likely to run along the street, potentially endangering residents, particularly the young children who may be crossing it. 12. Lack of good management Councillor Egan took some Church Grove residents to see a well-managed site in Hackney. While the residents were impressed with what they saw (although access is not a problem there: travellers do not have to pass through residents' community space to get in and out), it highlighted another weakness in the Council's plans. The Hackney site is visited every day by an experienced manager, and the travellers living there agree that this is key to the success of the site. The site manager herself insisted this would need to be done at Church Grove too (she also said no site should go ahead here until the access problem is sorted out). Yet the Council has stated that it will not be spending money on this level of management at the Church Grove site. 13. Public and Press Support Support for the residents' position - i.e. not against travellers but against the total unsuitability of the Council's plans - has been virtually unanimous. The online petition at our website has received (at the time of writing) 417 signatures - a very high number considering this is a tiny street of only 19 houses. As mentioned above, Joan Ruddock has publicly expressed her view that Church Grove is totally unsuitable for a travellers' site. I strongly suggest the Council studies our website, including the many public comments expressing shock, surprise and outrage at this proposal. 14. Conclusion It seems incredible to us that our own Council - comprising elected representatives of the people - has over the past four years shown absolutely no interest in our legitimate concerns over this proposal(s). It has shown commendable concern for travellers' needs; however, this has been out of all proportion both to the concern it has shown us and to the current situation where it cannot even find any travellers who want to live at this site. The Council has also ignored key government advice on early and thorough consultation both of travellers' and residents' communities. It has launched a consultation without explaining what the consultation is on . In the consultation letter it provided false information on key elements; later admitted this was the case, promised to put it right but didn't; commissioned an independent transport report (an act in itself which should at least have stopped the consultation) which it subsequently refused to show residents before the consultation closes. Terry Edge</p>	
74	<p>À Kim Horwood 9 Church Grove London SE13 7UU 15th December 2011 CHURCH GROVE TRAVELLERS' SITE CONSULTATION Please note: the Council will be receiving reports by Boyer Planning and Sanderson Associates, commissioned by the residents, and submitted on our behalf. I make references to these in my comments below. In addition, we have been receiving advice from Irwin Mitchell Solicitors, whose early advice is that the planning permission is no longer appropriate, also that the consultation process is seriously flawed and should be at the least re-started. My comments are as below. 1. The previously granted planning permission is no longer appropriate Irwin Mitchell's advice to us is that the Council has only limited scope for revisiting the previously granted planning permission, i.e. it has a duty to reconsider the desirability of implementing it so long after it was granted when circumstances and knowledge have changed. The previous planning permission was granted for known traveller families, living at the Thurston Road site, who had to be re-housed due to the fact the Council's plans for regenerating Lewisham involved demolishing their current site. During the consultation and planning processes, the Council constantly assured Church Grove residents that these particular families had needs which were less onerous than travellers in general, e.g. that they did not travel; their caravans were small; there were no men (i.e. no commercial vehicles entering and</p>	SE13 7UU

leaving the site on a regular basis - although in fact this wasn't true); that Church Grove was better suited than the Council's consultants' first choice - the lorry park in Catford - because these travellers wanted to be closer to their current amenities. But those traveller families gave up their traveller licences and therefore the need disappeared. For this current proposal, the Council has no idea which travellers will be living on the site. Therefore, all their previous arguments against access etc problems - which Church Grove residents didn't accept in any case - clearly now count against Church Grove being a suitable site. Yet there is no evidence in the Council's reasoning for Church Grove to be again the preferred site that this has been taken into account. The key issue of access - which the Council has subsequently admitted, and the Mayor agreed, is a major problem - 'answered' simply by saying that the previous planning permission (dealt with it).

2. The Council has broken its promises to Church Grove residents. After the Thurston Road travellers sold up their rights, Steve Gough informed residents that the then existing plan for Church Grove was no longer required; that planning would be allowed to lapse; and that any further plans for traveller sites in Lewisham would have to be assessed under new criteria for a new planning permission. He also promised to inform us if this changed. He broke this promise by not even telling residents that the plan was being re-proposed to the Mayor: we only found out because a reporter told us two days before the Mayor's meeting to agree the proposal. Once again, and despite the lessons of the previous process, the Council is in breach of government guidance (DCLG) to consult both the traveller and settled community early. Despite knowing how stressed residents were last time, on only hearing of the Council's plans when a letter dropped through our doors telling us the consultation was on, it planned to do exactly the same thing again. Also, the Council's current consultation letter states that it still has permission for the old plan. How can the Council claim - as it appears to be doing - that one planning permission is good for both plans? This is clearly absurd. In other words, the Council is claiming it has planning permission for a site based on now defunct needs. This clearly means the plan is defunct. In short, the Council allowed planning permission to lapse because it no longer required Church Grove for the previous purpose it said existed. It's asking residents to believe it then instigated a new search for sites based on new criteria and that it's nothing more than coincidence that the final figure of required sites - 5 - is exactly the same for both needs assessments!

Further support for our belief the Council no longer wanted Church Grove for a travellers' site was supplied in this email: Fri 13th February 2009 Email from Heidi Alexander (then Deputy Mayor, now MP for Lewisham East) Dear Simon Â I am sorry not to reply to your email sooner. I had a meeting with some of your neighbours this morning so it may be that an update has already reached you but if not, the summary is as follows: Towards the end of last year the travellers living on Thurston Rd expressed concerns about moving to a new site on Church Grove and asked the Council if it would consider terms for the surrender of their licences. The travellers, with legal representation, agreed terms and vacated Thurston Rd at the beginning of this month. The Council is now undertaking a site search for an alternative single site of a minimum of 9 pitches and the results will be reported to the Mayor when it is completed. Whilst I can't guarantee that a site won't be built at Church Grove (as it will be considered as part of the site search), the need to relocate the long-term residents of Thurston Road due to the town centre redevelopment plans no longer exists and as such some of the factors that affected the selection of Church Grove as the council's preferred site are no longer relevant (i.e. the need to keep the site in the vicinity of Lewisham town centre and the need for a site that could be delivered quickly). London-wide research has also been conducted which suggests that Lewisham requires a minimum of 9 traveller pitches (as detailed above) and this number of pitches would not fit onto the Church Grove site. Â I am sorry I can't provide any more definitive news at the moment. However, at the meeting this

morning we did agree that the council would keep resident representatives updated as the site search progresses. Yours sincerely
Cllr Heidi Alexander Deputy Mayor and Cabinet Member for Regeneration

This clearly shows that the Council thought Church Grove was no longer suitable for a site because the original traveller requirements had changed and because they now needed a site for 9 pitches. It also acknowledges that some of the factors that made Church Grove the preferred site before no longer existed - yet the Council is still claiming that Church Grove is the first preferred site! Previously, as already stated, the lorry park in Catford was actually scored first, which raises the obvious question of how it's possible for it not to be first again especially in light of Church Grove's now reduced special considerations.

3. Planning permission showing as 'withdrawn' from the Council's planning website, re-entered some months later as 'granted' We believe this may be illegal, and certainly at least raises residents' and other stakeholders' legitimate expectations that the site was not going to be used as a Travellers' site. We know of two residents close to Church Grove who bought properties recently on the basis that their searches showed this permission had been 'withdrawn'. Clearly, this is the very opposite of early consultation.

4. Consultation process flawed, mismanaged and deceptive
The consultation letter refers, again, to traveller caravans being only 2.2m wide. When the Mayor visited Church Grove recently, Steve Gough publicly apologised to the residents for getting this fact wrong - he accepted, in front of the Mayor, that Traveller caravans can be up to 2.55m wide with another 0.5m required for extended wing mirrors, and promised that he would instruct his officers to stop informing people at drop-ins wrongly. Clearly, therefore, the consultation is flawed: stakeholders have not been told the full extent of the key problem. The consultation letter has not been reissued or even amended, and the Council's website has simply removed the relevant section, i.e. so there is now no mention of access at all. The consultation letter states that as residents' questions are raised they will be put on the Council website. However, at three days before the consultation closes there are no questions on the website, despite dozens having been raised in writing and at drop-ins/meetings. Also, at the first drop-in session, Steve Gough promised to answer residents' questions during the process: to date, he has answered none of them. This is gross misconduct on the part of the Council and Mr Gough in particular. At the request of the Mayor, Steve Gough has commissioned an independent report into road issues around Church Grove. When asked at the last public meeting why he has not re-started the consultation or at the very least amended it, he said he was waiting for the results of the report. Apart from the fact he had had the report for several days at the time of this meeting, this was a clear lie: he had already admitted the consultation letter was wrong. We now have a situation where it looks as if the key information residents need to respond to this consultation will not be made available until after the consultation has ended. This is in breach of government guidelines on good consultation practice. At the time of writing, the residents have requested several times in writing that Steve Gough impart the content of this report but he has not even answered them. Residents will be putting in a formal complaint about Mr Gough's behaviour in this matter.

5. Traveller consultation
As said, government guidance recommends early consultation with both communities. Yet it appears as if the Council has not been able to even find any travellers to consult with about this site, other than two ladies who were kind enough to meet some residents just over a week ago. Those ladies did not express any desire to come to Church Grove. Therefore, the Council has failed to consult its intended population of travellers for this site. Given the Church Grove residents have shown ample reasons why this site is not suitable, where is the Council's evidence that the Travellers' community believes otherwise?

6. No Justification/Need
Simon Raper, a resident and statistician, has shown in writing to the Council how the Needs Assessment made by Local Dialogue is seriously faulted. The Boyer report says the same.

Common sense alone shows that nothing solid can be deduced from only 11 returns out of an estimated Traveller population of nearly 500. In any case, there was very little need (as opposed to wish) shown in even those eleven returns. I believe the Council may also be guilty of misconduct in this respect. At one of the drop-ins, I pointed out to Kplom Lotsu (Steve Gough's assistant) the lack of evidence in the assessment for need. He assured me that, since the assessment was concluded, the Council has been working hard to find more travellers who want to come to Church Grove. In other words, the Council is trying to stretch what is now a closed assessment - and which the decision to consult on Church Grove was based on - by actively seeking out and persuading Travellers that they should live there! This seems at least absurd, given the huge shortage of housing in Lewisham required by people with a legitimate need. It also smacks of maladministration.

7. Access The Council is well aware of the issue that Church Grove is too narrow to take regular traveller traffic. I refer you to the reports by Boyer Planning and Anderson Associates which fully support the residents' research to show that, for example, traveller caravans are frequently too wide for the available access, e.g. 3.05m (2.55m plus legally required extended wing mirrors at 0.5m) needing to traverse a 2.6m road space (as measured by the Council). Even if a lorry plus caravan traverses the narrow pavement on the non-parking side (0.9m), it will be in grave danger of causing damage to parked cars, fences/hedges, and indeed to residents who step on to the pavement unsighted. The Council has used the argument that its refuse lorry accesses the street and that is 2.5m wide. We have pointed out to the Council, however, that in fact the lorry rarely comes down the street, but stops close to the Ladywell Road end. On rare occasions when it has come further, it has had to drive along the pavement. The point being that it is much easier to control a fixed base vehicle performing such a manoeuvre than it is to control a lorry pulling a large caravan. The argument the Council used in the first round of planning was that the Thurston Road travellers only had small caravans and "didn't travel", i.e. it's not much of a problem. We dispute even this argument, on the grounds that the Council should not be building a travellers' site that curtails their natural right to travel. Also that in any case there is photographic evidence that the Thurston Road site was host to lorries, i.e. that there would have been daily in/out movement of lorries along Church Grove even under the old scheme. The Sanderson report, however, points out that there is likely to be far greater movement of heavy traffic to and from the Church Grove site, to quote: "Evidence accepted by consultant's representing Travellers at a recent public inquiry, Inspectorate reference APP/M2325/C/10/2134060-74 and APP/M2325/A/2134042 was that from figures drawn from the TRICS database system (the industry standard for assessment) a level of 10 trips per pitch was to be expected in a 24 hour period. This level of use is higher than that of a normal dwelling which is in the order of 8 trips and lower, per house per day. As such the 5 proposed pitches would generate 50 vehicle movements per day, all of which traffic would be new to Church Grove." In other words, the volume of heavy traffic along Church Grove is going to be far higher than the Council has allowed for. This will greatly exacerbate tension between the two communities, which of course works directly against government (DCLG) guidance that Local Authorities must ensure the needs of both communities are catered for. Where static caravans/mobile homes are concerned, the Council agrees that these at least will only be able to transfer down Church Grove if the residents' cars are removed. What the Council does not appear to have considered, however, is how exactly these homes will reach the site. We've spoken to a firm which specialises in moving travellers' static caravans and after looking at the street on Google Maps they didn't believe a flat-bed lorry (required for transporting sections that can be 45ft in length) would have enough space to turn into the street or into the site. Therefore, it would be necessary to park the lorry in Ladywell Road, thereby blocking one lane of a very busy road; then unload the static caravan section, which would then block the

other lane too. Then it would be necessary to push the section by hand along Church Grove. We have pointed out to the Council that anyone with a zone B parking pass can (and does) park in Church Grove. Therefore, it's extremely unlikely that the Council will be able to contact the owner of every car, each time a static caravan or mobile home is moving into or out of the site. The Council's own needs assessment states that Lewisham travellers have a high degree of mobility. In other words, families will be moving in and out of the site perhaps up to 5 times a year, which equates to 10 movements of their buildings, each movement requiring two lorry loads. Even if travellers inform the Council each time they want to move, timings can change at the last minute. Also, the Council will have to arrange in advance for residents' to move their cars . Apart from car owners who are not contactable, the Council is being nerve to say the least if it believes every Church Grove resident is going to willingly comply with this regularly-occurring inconvenience. Astonishingly, at the last public meeting Steve Gough, when this point was put to him, admitted 1) that the Council would have to use a crane to lift some cars off the road, and b) that this is an illegal act! Apart from the fact that such cars would in actuality have to be lifted out of the street - since being placed on the pavement will still not provide sufficient access for a mobile home - the Council cannot possibly suggest a solution to a problem with its plan that requires it to break the law! This issue in particular has proved to residents that the Council cares nothing for residents' well-being and is only interested in fulfilling what it sees to be the cheapest and most convenient solution to a piece of land it has spare. Every single person who's seen the street - from Joan Ruddock to guests to the residents' website (www.savechurchgrove.com) - has expressed the common sense view, usually accompanied by a mixture of horror and amusement, that this is a totally unsuitable road to provide access to a travellers' site. We are in the absurd situation where for four years, neither Mr Gough, nor any Council official, nor various councillors, has been apparently able to pick up a telephone and contact a caravan authority (details of which have been supplied by the residents to the Council on numerous occasions) or spend 15mins on the internet to discover that traveller touring caravans are frequently 2.44-2.55m wide and not only the 2.2m that the Council believes (although Mr Gough has since admitted he got this wrong). The situation has been exacerbated by a change in the law in 2010, regarding towing. Before, cars were allowed to pull caravans only up to 2.3m in width. Now, they can pull caravans up to 2.5m in width (as long as they're under 7m in length: longer caravans, preferred by travellers, still need to be pulled by lorries) - bringing the UK in line with the rest of the EU. In other words, there will clearly now and in future be an increase on UK roads of wider caravans, and therefore an increase in these bigger vehicles coming to and from Church Grove. This, incidentally, is one of many changes in situation/law that invalidates the Council re-visiting the planning permission.

8. Conservation The original plan was in clear breach of the Council's own rules for a Conservation Area (which Church Grove is in), i.e. that any nearby developments should be in keeping with the area. Previously, the Council failed to explain how caravans and mobile homes can be in keeping with a conservation area. It promised to spend more than the usual amount of money on making the utility blocks blend in with the surroundings. This time, it has failed to answer whether or not extra funds are still available, i.e. if as is likely they are not, going ahead with the plan will be in even further breach of conservation rules.

9. ROI considerations With the introduction of the Localism Act on 15 November 2011, the Council no longer has a statutory duty to provide traveller sites. By contrast, it does have a statutory duty to provide more sheltered accommodation, for which there is a great and growing need in Lewisham. The Council has been contacted by The Lewisham Almshouse Charity expressing an interest in the Church Grove site being used for sheltered housing. Given the problems of access and heavy rate of traffic which comes with a traveller site (see the Boyer and Sanderson reports), we believe this would be

	<p>a much more appropriate and needed use of the site. 10. Bad weather dangers One of the many considerations the Council has failed to make is the additional health and safety risks which will arrive with bad weather (see the residents' commissioned reports). Clearly, the access width on Church Grove is already severely limited; and given that a caravan is hard enough to control in ideal conditions, there is a strong likelihood of damage to cars, property and residents themselves from the frequent movement of lorries, along with caravans at times, to and from the site. 11. Nuisance of dogs/quad bikes In its firsts set of plans, the Council stated that it would not install a gate across the entrance to the site. Travellers are well known for possessing more dogs than usual, and their children often have quad bikes. Without a gate, both dogs and bikes are likely to run along the street, potentially endangering residents, particularly the young children who may be crossing it. 12. Lack of good management Councillor Egan took some Church Grove residents to see a well-managed site in Hackney. While the residents were impressed with what they saw (although access is not a problem there: travellers do not have to pass through residents' community space to get in and out), it highlighted another weakness in the Council's plans. The Hackney site is visited every day by an experienced manager, and the travellers living there agree that this is key to the success of the site. The site manager herself insisted this would need to be done at Church Grove too (she also said no site should go ahead here until the access problem is sorted out). Yet the Council has stated that it will not be spending money on this level of management at the Church Grove site. 13. Public and Press Support Support for the residents' position - i.e. not against travellers but against the total unsuitability of the Council's plans - has been virtually unanimous. The online petition at our website has received (at the time of writing) 417 signatures - a very high number considering this is a tiny street of only 19 houses. As mentioned above, Joan Ruddock has publicly expressed her view that Church Grove is totally unsuitable for a travellers' site. I strongly suggest the Council studies our website, including the many public comments expressing shock, surprise and outrage at this proposal. 14. Conclusion It seems incredible to us that our own Council - comprising elected representatives of the people - has over the past four years shown absolutely no interest in our legitimate concerns over this proposal(s). It has shown commendable concern for travellers' needs; however, this has been out of all proportion both to the concern it has shown us and to the current situation where it cannot even find any travellers who want to live at this site. The Council has also ignored key government advice on early and thorough consultation both of travellers' and residents' communities. It has launched a consultation without explaining what the consultation is on . In the consultation letter it provided false information on key elements; later admitted this was the case, promised to put it right but didn't; commissioned an independent transport report (an act in itself which should at least have stopped the consultation) which it subsequently refused to show residents before the consultation closes. Kim Horwood</p>	
75	I think this is a very bad idea; the road is too narrow and the local community have not been properly consulted.	London SE4 1JX

76	<p>Response to Travellers and Gypsies site proposed for former Watergate School Site NEED The Council sent questionnaires to 100 traveller and gypsies families and 11 replied. The Council admits there is no NEED for housing but three expressed a "desire" to move to the Church Grove site. Statistically this is of no value and should not be used. There was no reassessment of previous sites or potential new sites, i.e. Thurston Road, Catford Dog Track (travellers and gypsy sites are recommended for inclusion in new housing developments by the DCLG), Catford Lorry Park. The Church Grove site must be a transient site as the previous Thurston Road travellers surrendered their licences and live in social/private rented accommodation and have no housing NEEDS. A transient travellers' site will cause an enormous amount of upheaval for the whole of Church Grove because of its inadequate and narrow access. PLANNING The Church Grove site will be a caravan/mobile home park. It will not enhance St Mary's Conservation area as requested in the Lewisham St Mary's Conservation area document. The plans proposed have no architectural merit. The site is on a high risk flood plain, especially dangerous to caravans and mobile homes and is against DCLG advice. Raising the site level as stated in the plans will exacerbate any flooding of residents' houses in Church Grove. The site is contaminated, which is again against DCLG advice. It has very narrow access from Ladywell Road to the site, again against DCLG advice. To date there has been no expert traffic assessment of the feasibility of access to and from Ladywell Road onto the site in Church Grove by vehicles used by travellers. There is no three metre clear area around the site perimeter to act as a fire precaution as required by the DCLG. CONSULTATION The drop-in leaflet distribution was unfair. The natural boundaries to the site are the two railway lines, Lewisham High Street and the footpath between St Mary's Church and cemetery. Distribution to Marsala Road was totally irrelevant. The narrow access problem has been known of since the site was chosen (it's biggest disadvantage stated in the consultant's report) and yet there is still no traffic expert access report after five years. ECONOMICS The Church Grove site is 3,425 square metres in area. It cannot be justified to use this site for just five families when it could provide much needed residential housing for 30-50 families or sheltered homes for elderly people. In conclusion, Thurston Road "became unfit for purpose" because of the Council's neglect and lack of management. We know that if this poorly-thought through and researched proposal goes ahead in five or six years time the site will become an eyesore. This specific site is unfit for this purpose. Response to Travellers and Gypsies site proposed for former Watergate School Site NEED The Council sent questionnaires to 100 traveller and gypsies families and 11 replied. The Council admits there is no NEED for housing but three expressed a "desire" to move to the Church Grove site. Statistically this is of no value and should not be used. There was no reassessment of previous sites or potential new sites, i.e. Thurston Road, Catford Dog Track (travellers and gypsy sites are recommended for inclusion in new housing developments by the DCLG), Catford Lorry Park. The Church Grove site must be a transient site as the previous Thurston Road travellers surrendered their licences and live in social/private rented accommodation and have no housing NEEDS. A transient travellers' site will cause an enormous amount of upheaval for the whole of Church Grove because of its inadequate and narrow access. PLANNING The Church Grove site will be a caravan/mobile home park. It will not enhance St Mary's Conservation area as requested in the Lewisham St Mary's Conservation area document. The plans proposed have no architectural merit. The site is on a high risk flood plain, especially dangerous to caravans and mobile homes and is against DCLG advice. Raising the site level as stated in the plans will exacerbate any flooding of residents' houses in Church Grove. The site is contaminated, which is again against DCLG advice. It has very narrow access from Ladywell Road to the site, again against DCLG advice. To date there has been no expert traffic assessment of the feasibility of access to and from</p>	SE13 7UU
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77	<p>I would like to question the basis for this consultation. I do not believe it should have taken place. I understand that the decision to consult was taken at a Mayor and Cabinet meeting on 5 th October 2011 in response to a report, "Travellers' Site - Needs Assessment & Site Selection", compiled by Council officers. Having read this report, I believe the Mayor and Cabinet were misled on several counts. Site Search The site search reported to the Mayor and Cabinet on 5th October was based on an external report by CB Richard Ellis in 2007. This external report is now nearly five years old. The criteria for suitable sites at the time were: Located within easy travelling distance of Lewisham Town Centre Should avoid fragmentation of existing Traveller community Ready for occupation by the end of 2007 Should accommodate 8 pitches (minimum area 1,800 sq. m) Given that the situation is now very different, if a fresh search was to be conducted the criteria would necessarily be different. The occupation date is different, the size required is smaller and there is no existing community in Lewisham Town Centre. There are also new guidelines about suitability to consider (DCLG, 2008). I don't think we can assume that the results would be the same. Note that the Watergate site was originally thought to be capable of hosting eight pitches but the Environment Agency required a flood protection zone, reducing the number possible to five. If this had been known at the time, it would not even have been shortlisted in 2007. Council officers claim to have updated the 2007 site search, however the criteria they used are not clearly presented. The whole process lacks transparency. It is nevertheless clear from the results that they failed to take into account many of the recommendations of the 2008 DCLG Good Practice Guide to the design of Travellers' sites. They simply define suitability as within 800m of primary school, GP and food shop. Thus it appears to me that the Council has not done a proper site search. It is not objective and does not bear in mind simple criteria such as width of the access road. The fact that the site in Church Grove is shortlisted despite breaking eleven of the essential criteria in the DCLG Good Practice Guide, confirms that these guidelines have been ignored. Option Appraisal In the report the basis for selecting Church Grove is an optional appraisal, which has not been conducted truthfully or objectively. The way the criteria are chosen and defined is peculiar and important facts are ignored. Under 'suitability' issues such as access are not included, even though there are national guidelines about this that clearly make some sites more appropriate than others. For example, Church Grove has a very narrow single access road and yet the way suitability is considered this is ignored. In fact it scored 5/5 for suitability! Under 'availability' it is clear that what was considered is not availability but ownership. The Catford Stadium site is available in that the current owners wish to dispose of it, but the Council do not own it, it has been scored low. I do understand that the Council would have to buy the land, but since the site in Church Grove</p>	SE13 7UU

was previously ear marked for disposal and I have been told has a value of 1.5 million, I can see no reason why the Council can't dispose of an unsuitable site and buy a more suitable one. Under 'alternative corporate use' the fact that the Council's own Primary Places Strategy clearly identifies Church Grove for the establishment of 2 forms of entry of primary provision as recently as April this year is ignored. Instead it is stated that there is no alternative corporate use. Under planning constraints' the fact that previous planning permission was given under very different circumstances is ignored. In discussing the option appraisal with Council officers at the consultation drop-ins, it became clear that Church Grove is simply a pragmatic choice for the Council because planning permission has previously been given. However this position ignores the fact that planning permission was previously given under very different circumstances. It appears to me that this pragmatic' position also prevented an objective process of option appraisal. I believe that a more balanced option appraisal would result in Church Grove scoring much lower and other sites such as Catford Stadium coming to the fore. It therefore seems essential to return to the criteria, ensure that they are chosen and defined appropriately, then begin both the site search and optional appraisal afresh. Needs Assessment The needs assessment done this year is inadequate. It only reports data from 11 survey responses, which hardly provides a proper basis for the significant investment the Council is proposing to make. Given that the report itself acknowledges that there is "difficulty ascertaining the exact level of need", why is the Mayor and Cabinet proceeding? I would suggest that the Council needs to do a lot more work engaging with the local Traveller community before it makes any decisions. Until the actual needs of the population are known, how can any realistic planning take place? There is evidence that small sites work when they are taken by one extended Traveller family. If the Council wish to pursue this approach, they need a comprehensive assessment of the needs of such extended families and to plan several small sites together. Otherwise there can be no fairness in allocating pitches. The current situation leaves open the distinct possibility that the Council could build a small site in Church Grove at vast expense which is not wanted because it cannot be allocated to a family group. Consultation The consultation has been so poorly conducted that the Mayor and Cabinet should require it to begin again. Wrong information was given to stakeholders in the original letter to residents (e.g. width of caravans) which has not been corrected despite Steve Gough admitting it was wrong. An independent report on access was commissioned during the consultation period, which has not been made publically available. Local Dialogue, who did the needs assessment, are refusing to be questioned on their report which provides the key evidence' for the recommendation of five pitches. Participants in the consultation have therefore not had the facts available to them and in some instances have been misled. Existing Planning permission I do not believe that the Council has existing planning permission, although it has claimed to do so throughout the consultation. This in itself has meant that the consultation has been conducted on a false premise and is therefore invalid. The reasons I believe permission does not continue are that The Council wrote to residents stating that they intended to let planning permission lapse in April 2011 Planning permission was labelled as withdrawn for several months after April 2011 The intended use of the site is now very different from when planning permission was originally granted and surrounding guidelines and laws have changed. For these reason, if the Council wished to pursue the proposal to place a Travellers' site in Church Grove, planning permission would have to be sought afresh. Failure to do so would in my view face a legal challenge. Conclusions Throughout the consultation local residents have outlined clearly the very many reasons that Church Grove is not suitable as a location for a Travellers' site. In brief this is because It has only one point of access into and out of the site. This creates safety concerns and potential conflict between the Traveller and settled community both of which have to share

	<p>the same tiny road. Access down Church Grove (a narrow single lane cul de sac) is not wide enough for lorries, fire engines or caravans to drive down without mounting the pavement. It is on a flood plain next to the river Ravensbourne, No one currently living in Church Grove can take out new buildings insurance. Any Travellers moving in probably couldn't insure their homes. It suffers noise pollution from the railway line and Council depot opposite It is contaminated with toxic cadmium and other heavy metals It is simply too small. Previously Lewisham was required to provide 16 pitches and so it cannot now hide behind an inadequate needs assessment to claim that five pitches between 490 Travellers in the borough is sufficient. It is on the boundary of a conservation area, for which the local development plan specifies "a high quality design that preserves the setting of...Church Grove". If the Council was truly committed to providing a high quality Travellers' site, it wouldn't be proposing to make do with Church Grove. It also wouldn't be in such a rush. The Mayor and Cabinet should ask for the whole process of needs assessment, site search and selection to begin afresh in a more objective and well informed manner. A new consultation on the options should then begin, with care taken to conduct it properly. Caroline Cupitt 15th December 2011</p>	
78	<p>David Hutchens 18 Church Grove, SE13 7UU 15.12.11 I have a number of objections, both to the consultation' and the proposal. Your consultation' is a sham. How can a consultation on one option have any meaning? Significantly, the decision to go to consultation' on a single option was done furtively, and residents only found out about the proposal via a local journalist. It is put to Church Grove residents that this was an unfortunate oversight (a common theme from the previous application when similar promises were routinely broken), but both council officers and councillors had undertaken to keep residents informed and one can only conclude that it suited Lewisham council to keep the project a secret from the Church Grove community as long as possible. It seems that members of the travelling community had been told about the proposal months before the settled community. This is clearly bad practice and against guidance that people from the affected settled community should be involved at the same stage as travellers. One of the Lewisham Central councillors assured Church Grove residents that the process of site search and appraisal had been carried out by external consultants, in an unbiased fashion. He has since acknowledged that this is not the case, and that the process was handled by Council officers. I believe this was done in such a way as to minimize inconvenience for the Council, and with no real thought for the needs of either the settled community or the Traveller community. Site search - a cut and paste job from the previous application with the decision to choose Church Grove already made on the basis of previous planning consent (given several years previously under very different circumstances, both in terms of travellers circumstances and relevant guidance/legislation). Options appraisal - this is enough to make a cat laugh. It looks like this was done back to front i.e. having decided on Church Grove (on the basis of previous planning consent) the criteria and assessment was then tweaked to justify the decision already made. Needs assessment carried out by Local Dialogue-given the feebleness of this survey and the tiny number of people engaged with, it is astonishing that such a document could be used as a basis for any significant decision making. The letter sent by Steve Gough to local residents about the consultation' is based entirely on previous application and related surveys. Concerns raised by residents about access situation on many occasions were completely ignored and consequently misleading and inaccurate information has been circulated to the local community. Looking back to 2007, when the travellers site was first proposed, it is striking how the terms of the council's presentation have shifted. Then, it was all about an identified community of Thurston Street residents who were being made homeless by Lewisham council as a result of the Gateway development. Church Grove residents who expressed any concerns about the proposal were routinely patronised by</p>	SE13 7UU

both council officers and councillors with statements about non-travelling travellers' who were a matriarchal community' and that everything would be fine because they never went anywhere; and people who challenged this were labelled racist and Nimby. Nevertheless, at the drop-ins it was routinely acknowledged that Church Grove was a far from ideal site-because of its location, access, flood plain etc-but that it would have to do because of the extreme urgency of the situation. Having obtained planning permission, the Thurston Rd travellers then disappear with no explanation offered to the Church Grove community (rumours that money changed hands to give up licenses) and the planning consent is allowed to lapse. Several years later the situation is very different: there are no travellers living outside of conventional housing in the Borough, and yet we find the same sense of desperate urgency in the process, with Church Grove being touted as the only possible solution etc. Mr Gough was questioned during one of the drop in sessions about the number of planning guidelines that are broken in the Church Grove plan. His answer was, 'They are just that-guidelines'. It had to be pointed out to him that the guidelines exist to prevent stupid decisions. Given the council has a statutory obligation to respect the interests of the settled community' the consultation process' has served only to reinforce the widely held view that the Church Grove Travellers site proposal is 'lazy and stupid planning' and reflects badly on the council and its officers. By proposing a site that is completely unsuitable for traditional nomadic lifestyles the Council clearly does not have the interest of the Traveller community at heart. Given that the Council informed Church Grove residents on more than one occasion that the previously granted planning permission would be allowed to lapse, it is surprising (to say the least) that the Council is asserting the right to make use of this previously granted permission now. I have heard it argued that Council officers were themselves ignorant of the legal situation and that they now believe they have an additional year in which this planning consent is valid. If this is true, it reflects poorly on the competence of everyone involved. And given the time that has elapsed since planning consent was given and the very different circumstances that now pertain, the original plan is now hopelessly out of date and surely cannot be used. If the Council tries, I would have thought a legal challenge is certain to follow. Throughout the consultation local residents have outlined clearly the very many reasons that Church Grove is not suitable as a location for a travellers' site. There is only one point of access into and out of the site. This creates safety concerns and potential friction and conflict between the traveller and settled community both of which have to share the same tiny road. Access down Church Grove (a narrow single lane cul de sac) is not wide enough for lorries, fire engines or caravans to drive down without mounting the pavement. It is on a flood plain next to the river Ravensbourne, No one currently living in Church Grove can take out new buildings insurance, due to perceived flood risk. Travellers are unlikely to be able to insure their homes. It suffers noise pollution from the railway line and Council depot opposite It is contaminated with toxic cadmium and other heavy metals It is simply too small. Previously Lewisham was required to provide 16 pitches and so it cannot now hide behind an inadequate needs assessment to claim that five pitches between 490 travellers in the borough is sufficient. It immediately abuts a conservation area. You will find a much more detailed and coherent account of the Church Grove community's concerns and objections in Mr Terry Edge's response, which you will have already received. Finally, I would like to draw your attention to the submission from the Ladywell Village Improvement Group, for an independent perspective on this whole sorry mess: The Council has behaved in a high-handed manner and all recent evidence suggests it is set on ignoring local concerns. The Council's apparent determination to push through this proposal highlights a lack of a strategic vision for the neighbourhood and LVIG invites the Council to embark on a broad, more meaningful consultation with residents about the future of the Ladywell area. Quite.

79	<p>Peter & Susan Scott-Cooksey 11 Church Grove London SE13 7UU 16 December 2011 CHURCH GROVE TRAVELLERS' SITE CONSULTATION We are writing this letter under duress. We resent being put in a position to protect our community once again from a Council that is truly fully aware of the inappropriateness of Church Grove as a site for Travellers yet continues to manipulate and distort needs assessments, figures, facts, and government guidance in their relentless pursuit of a Travellers site in Ladywell. You will shortly be in receipt of a dozen or so letters from angry residents of Church Grove; the best of neighbours who we personally are indebted to for their time and in-depth research; their open and intelligent manner, their dedication to opposing this proposal for the benefit of Church Grove, Travellers and the wider community. We fully support them. This entire consultation is seriously flawed as it is based on previous planning permission which was subsequently withdrawn (two residents close to Church Grove recently bought their properties on the basis that their searches showed this permission had been withdrawn.) Irwin Mitchell's advice to us is that the Council has only limited scope for revisiting the previously granted planning permission, i.e. it has a duty to reconsider the desirability of implementing it so long after it was granted when circumstances and knowledge have changed. Support for our belief the Council no longer wanted Church Grove for a travellers' site was supplied in this email: Fri 13th February 2009 Email from Heidi Alexander (then Deputy Mayor, now MP for Lewisham East) Dear Simon I am sorry not to reply to your email sooner. I had a meeting with some of your neighbours this morning so it may be that an update has already reached you but if not, the summary is as follows: Towards the end of last year the travellers living on Thurston Rd expressed concerns about moving to a new site on Church Grove and asked the Council if it would consider terms for the surrender of their licences. The travellers, with legal representation, agreed terms and vacated Thurston Rd at the beginning of this month. The Council is now undertaking a site search for an alternative single site of a minimum of 9 pitches and the results will be reported to the Mayor when it is completed. Whilst I can't guarantee that a site won't be built at Church Grove (as it will be considered as part of the site search), the need to relocate the long-term residents of Thurston Road due to the town centre redevelopment plans no longer exists and as such some of the factors that affected the selection of Church Grove as the council's preferred site are no longer relevant (i.e. the need to keep the site in the vicinity of Lewisham town centre and the need for a site that could be delivered quickly). London-wide research has also been conducted which suggests that Lewisham requires a minimum of 9 traveller pitches (as detailed above) and this number of pitches would not fit onto the Church Grove site. I am sorry I can't provide any more definitive news at the moment. However, at the meeting this morning we did agree that the council would keep resident representatives updated as the site search progresses. Yours sincerely Cllr Heidi Alexander Deputy Mayor and Cabinet Member for Regeneration Access Issues The consultation initiated in late 2007 saw the site as an answer to the proposed Thurston Rd development. The circumstances surrounding the initial proposal have changed substantially; a whole new planning application needs to be submitted together with a full consultation giving detailed attention to the access issue that was previously dismissed by Council. Council has subsequently admitted, and the Mayor agreed, that access is a major problem. Joan Ruddock also supports this view. Reports by Boyer Planning and Sanderson Associates, commissioned by Church Grove residents and submitted on our behalf, supports our arguments that Church Grove is unsuitable for increased vehicular traffic and caravan. Sanderson Associates estimate use to and from the site to be 50 vehicular movements per day (based on TRICS database system the industry standard for assessment) all of which would be new to Church Grove. Furthermore it concludes that the use of Church Grove for access has the potential to materially affect the safety of residents and the general public on the public highway.</p>	SE13 7UU
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	<p>No consideration has been given to the effects on access of poor weather conditions or road camber. London has seen progressively colder and icy winters. Church Grove has never received a visit from the gritting lorry or snow plough I suspect access would be a problem. Consultation process flawed, mismanaged and deceptive n Incorrect information regarding caravan widths consistently and intentionally used to mislead the public re access issues n Access Church Grove is too narrow to take regular Traveller traffic which would endanger residents and the general public n Council/Steve Gough refusal to answer resident questions at drop-ins/consultations n Reluctance of Council/Steve Gough to share findings of reports commissioned by council in a timely or unabridged manner n Needs assessment statistically flawed. Government guidance states that a credible evidence base requires statistically significant results. The sample used by Council is statistically too small to be of any value.(Boyer Planning) . Nothing solid can be deduced from only 11 returns out of an estimated Traveller population of nearly 500. In any case, there was very little need (as opposed to wish) shown in even those 11 returns Conservation Central and local government policy ignored with respect to preserving or enhancing the character and appearance of a conservation area. Caravans and mobile homes cannot be considered in keeping with a conservation area. Lack of good management Councillor Egan/Lewisham council took several Church Grove residents to visit sites in Hackney. These sites were well managed by a dedicated team and we were impressed by what we saw. Senior site officer Angela Emmerson, and travellers living there, agree dedicated management is key. Lewisham Council has no resources for a dedicated management team and will leave it with the local housing division who have no practical knowledge of Traveller issues/needs. In Hackney, the robust management team is there to ensure community cohesion and any incidents that arise are dealt with swiftly and fairly with equal weight given to both the Traveller and settled community. Neither of the sites visited had similar access issues to Church Grove; travellers do not have to pass through residents community space to get in and out. Angela Emmerson stated that the access issue needs addressing as a priority before all else. She also claimed the inclusion of a 3 meter fire break/perimeter access road separating the site from neighbouring properties is also of essential importance. Church Grove plans do not allow for this. Conclusion This proposal must be discarded now. It is clearly the wrong site for a development of this nature and with the introduction of the Localism Act on 15 November 2011 the Council no longer has a statutory duty to provide traveller sites. However, Lewisham has a duty to, and would be better served, by Council providing much needed green sheltered accommodation, for which there is urgent and growing demand. We understand the Council has been contacted by The Lewisham Almshouse Charity expressing an interest in the Church Grove site being used for sheltered housing. Given the problems of access and heavy rate of traffic which comes with a traveller site, we believe this would be a much more appropriate and safer use of the land. Peter & Susan Scott-Cooksey</p>	
80	<p>I did not receive any notification about this site for the consultation. I live at SE4 1JW (Chudleigh Road, Ladywell), I think sufficiently close enough that I should have been notified. I object to this, you have inhibited my ability to participate in a community decision. A caravan site is scruffy and will deface the community As a hard working taxpayer I object to having my house value adversely affected by a travellers site. If you must house them you should house them the way other people are obliged to be housed: in houses. As outlined below, I see no reason why these people, who often appear to live entirely off the taxpayer, should be entitled to special treatment. This discriminates against other UK citizens. One often hears that travellers have an above average propensity to petty crime. This may or may not be the case, however, what safeguards have you put in place to ensure that the local community does not suffer any adverse consequences, and if the crime and antisocial behaviour rates do</p>	SE4 1JW

	<p>rise if/when they move in, what guarantee can you give local residents that the perpetrators will have their site rights revoked and be removed in a timely fashion, and at no further cost to local taxpayers? Why do these people have the right to be given land in London, which is very expensive? Can they be housed somewhere cheaper? Any spare land in London should be used to build houses for working people, to help the economy. These people have as much right as everyone else to work and take out mortgages. Do these travellers have historic links with Lewisham? My understanding is that any British people finding themselves without a home in the UK are obliged to apply to the council where they have tenure, not to where they choose. I believe it is used to move on homeless people in London. This does not appear to apply to travellers and it therefore discriminates against ordinary UK citizens. Are any of the people you will settle foreign nationals? I object to my taxes being used to subsidize foreign nationals unless the cash comes out of the international aid budget. Suitability criterion: - within 800m of primary school, GP and food shop. Ordinary UK taxpayers do not have these needs met so why should (often non working, non taxpaying) travellers? This discriminates against ordinary UK citizens. Travellers are given special treatment because they are a race. Every UK/Irish traveller I have seen in the media appears to be Western Caucasian and therefore belongs to the same racial type as other indigenous UK citizens. Romanian gypsies tend to look like other Romanians, so it is a fair assumption they also belong to the same race. Therefore, I disagree entirely with the left wing delusion that we have to give these people special treatment due to their race (and in any case, giving any race special treatment is discriminatory).</p>	
81	<p>I am opposed to it. The area in question is a nice, quiet corner. A caravan site in that location would be unsightly and change the character of the immediate area. Most of all, I do not see the need for it, given all the potential gypsy and traveller families in the borough already have somewhere to live, and have been living in flats and houses for some time.</p>	SE6 4XH
82	<p>I am a resident of Church Grove and disagree with the selection of the former Watergate school site for the Gypsy and Travellers community due the fact it is not practical. Our road is just not big enough. I know that you have received information in droves from Church Grove residence as well as factual information from Boyer Planning and Transport report from Sanderson Associates. They are backing up all the reasons why we have been fighting this whole process. I see little point in repeating everything that others are saying as I feel that they have voiced what I feel loud and clear. Please, please please read all these outstanding submissions. You will be making a huge mistake if you continue with making a Gypsy and Travellers community in our road. We will have to live with the impact on our lives (not you) and the travellers will be on a site they will not be able move in and out of easily or freely. I'm sure that is not accommodating there needs which would be at best embarrassing for Lewisham. You are asking us for our views, but I have little confidence that you will consider our views. Maybe I might be proved wrong, I hope so.</p>	SE13 7UU

Petition opposing the choice of Church Grove as the preferred site to be developed to meet the current accomodation needs of Gypsy and Traveller families in Lewisham

Number	Date	First Name	Last Name	City	State/Province	For more impact, add a personal comment here
1	10/08/2011	Terry	Edge	London		
2	10/08/2011	Clare	Brynley-Jones	London		Stop bullying the residents of Church Grove just because it's a small street and find another site.
3	10/08/2011	Helen	Osborn	London		
4	10/08/2011	Peter	Cartwright	London		
5	10/08/2011	Martyn	Grant	Scarborough		Good luck, I'm with you all the way - as you say its about common sense not about travellers. Peter
6	10/08/2011	Jeffrey	Lincoln	london		
7	10/08/2011	Andrew	Perkins	lake mary	Florida	
8	10/09/2011	Maureen	Klug	london		
9	10/09/2011	Patricia	Brynley-Jones	Royston		
10	10/09/2011	catherine	wilkinson	tauranga		I used to live in Lewisham and I have to say this street is so beautiful and peaceful only problem is the car park due to the very narrow street..Can't imagine how a caravan can enter the street, if with my renault clio used to be not difficult, but had to enter with extra care not to scratch the cars of residents. Have a look at the pictures they talk for themselves!!!
11	10/09/2011	Frode	SÅ,rensen	London		
12	10/09/2011	Caroline	Cupitt	London		
13	10/09/2011	Janet	Cook	London		I will not save Lewisham Council from the shame of not attending to the needs of travellers in 2004 and then to go on to betray residents.
14	10/10/2011	Keith	Jones	London		
15	10/10/2011	Lorenzo	Pugliese	London		Please, make an effort: find a more convenient site. Thank you.
16	10/10/2011	Tim	Richards	Crowborough		
17	10/10/2011	Dominic	Lees	Stansted		
18	10/10/2011	Roshan	Gonsalkorale	London		Why do we accommodate for people who don't pay taxes?
19	10/10/2011	A	Trundle	London		
20	10/10/2011	Martin	Raper	Bury St Edmunds		
21	10/10/2011	Maria	Stamati-Knipe	London		
22	10/10/2011	Annette	Marchini	London		I am an architect who did refurbishmet work in one of the houses in the street. The little road and the area is absolutely unsuitable to lead to a traveller site. Also the drainage situation in this road is dismal and unchartered so that it would be impossible to extend the sewers. I am an ex-resident of Church Grove. This street is a very small road full of small cottages from the 1830's, home to a very diverse but functioning mini-community. They are all very open minded and I am absolutely sure that their objection to the plans about a traveller's site has nothing whatsoever to do with prejudice against travellers. It is simply about the size and number of caravans and trailers trying to squeeze through this small cul-de-sac and the impact this is going to have on the residents. With the best intentions this is going to create frictions, which should not be in anybody's best interest.
23	10/10/2011	Achim	Schwenk	London		Church Grove has a special atmosphere more like a village street than a London one
24	10/10/2011	m	hunt	east grinstead		
25	10/10/2011	Susie	Donnelly	london		
26	10/10/2011	C	Horne	Guildford		
27	10/10/2011	nadine	fathers	london		
28	10/10/2011	Julia	Raper	Bury St Edmunds		
29	10/10/2011	Seth	Carnill	Sudbury		
30	10/10/2011	guy	de vere	marlow		
31	10/10/2011	Robert	Raper	Zurich		Lacks any common sense. if there is a major accident or fire on the site and it cant be reached the council have been clearly warned by numerous people and will have to take full responsibility
32	10/10/2011	Mark	Burford	London		
33	10/10/2011	Vera	Parker	London		
34	10/10/2011	Stefan	Struebind	London		Maintain the character and spirit of this lovely cul de sac! Ridiculous proposal.
35	10/10/2011	Joe	Parker	London		
36	10/10/2011	Susan	Scott-Cooksey	London		
37	10/10/2011	michelle	stevens	london		I can't believe the council have resurrected this. What am I saying? Yes, I can believe that they've done it, it's the sort of underhand thing that they're good at!
38	10/10/2011	Peter	Scott-Cooksey	London		
39	10/10/2011	Penny	Ackroyd	London		I believe this site to be totally innappropriate for the reasons mentioned and unfair on the local residents in the tiny street. I also beleive it has been a rushed response from Lewisham Council because they did not plan properly for the needs of Travellers in the first place when agreeing to the Lewisham Gateway development.
40	10/10/2011	Sue	Manning	Richmond		
41	10/10/2011	Stella	Lewis	London		
42	10/10/2011	Luke	Brynley-Jones	Royston		I'm really shocked that the Council are even considering such a stupid step.
43	10/10/2011	Boz	cerhan	London		
44	10/10/2011	Erica	Thomas	London		

45	10/10/2011	sheila	taylor	london
46	10/10/2011	Rob	May	Chatham

Lewisham council originally looked at church grove as a travellers site as it was close to the childrens school and seemed the best fit at the time. It was never going to be big enough for purpose then and that has not changed so why are they so set on trying to make this small plot a travellers site in a road thats far too small? Outrageous, buoldthe site elsewhere
Lewisham's voters have every right to be angry when a local council crucially goes against its own policies in this unnecessary affair, notwithstanding the majority objection of local residents where, as on so many other issues these days, common sense and logic is sacrificed to the major detriment of the established community.

Policy reversals aside, residents in the immediate and surrounding area alone, will not accept their opinions being ignored additionally, for the benefit of a minority scheme which on the issues raised, does not merit accommodating inside a sensitive and established conservation area, besides the clear H&S considerations already outlined.

The result is more local and uncaring council madness yet again, and of a type so typically divisive and poorly thought-out in particular, to council residents in general over the last decade. This error sees attempts to enforce unvoted-for reforms and changes onto a locally-developed inner London environment of proven history and charm. Such legislation would only succeed in

47	10/10/2011	Garry	O'Keefe	London
48	10/10/2011	sue	holmes	london
49	10/10/2011	Claire	Guest	London
51	10/10/2011	Marie	South	LONDON
52	10/10/2011	kit	Strange	Tottenham
53	10/10/2011	Duncan	Grant	Brighton
54	10/10/2011	szilvia	Budaik	London
55	10/10/2011	jeremy	broome	london

I cannot believe the council have the spare money to waste on this clearly ridiculous proposal...all it would take is for someone to spend half an hour with resident of church grove and a tape measure to realise how flawed the plans are. Then let the poor residents of church grove get on with their lives safely and without all this stress it must be causing them all.

56	10/11/2011	Clare	Ginders	Sawbridgeworth
57	10/11/2011	Louise	Boyce	London
58	10/11/2011	Julie	Marshall	Sandy
59	10/11/2011	Emily	Sandford	London
60	10/11/2011	Bill	Richards	Epping

I live around the corner from church grove - clearly this is an insane idea - I cant believe its back on the agenda - not good for the travellers with their limited access and a nightmare for the residents with the regular traffic going down an already tiny street. PLEASE let sanity win in this case once and for all.

61	10/11/2011	William	South	LONDON
62	10/11/2011	rebecca	myers	bury st edmunds
63	10/11/2011	Michael	Mereborg	London
64	10/11/2011	Douglas	McCabe	London
65	10/11/2011	Mandy	Naumann	Harrow
66	10/11/2011	Renzo	Marchini	London

Disgraceful!

67	10/11/2011	M.	Kulhan	ladywell
68	10/11/2011	P	Bellamy	Penzance
69	10/11/2011	Roisin	McCarthy	Basingstoke
70	10/11/2011	Rachel	Morgan	London
71	10/11/2011	Ric	Bailey	Hove
72	10/11/2011	alex	lewis	london
73	10/11/2011	Gary	Ryan	Hemel Hempstead
74	10/11/2011	Simon	Raper	London
75	10/11/2011	Andrew	Sleightholme	London
76	10/11/2011	Matthew	Marshall	Gamlingay
77	10/11/2011	Tara	Thompson	London
78	10/11/2011	Annie	Fitzgerald	London

Lewisham Council have not been honest with Church Grove, again! This proposal is unrealistic with environmental & safety laws- Support these Ladywell residents!

This is definitely not the right place for a travelling community site.

79	10/11/2011	wil	harding	london
80	10/11/2011	Isabelle	Sene	Emsworth
81	10/11/2011	Nicola	Henshaw	London
82	10/11/2011	Claire	Lee	Newport

All this council back pedalling shows them for what they are. Self serving and without a care for the people that voted them in and those who pay their Council tax whose lives are blighted by the council's ill thought through actions. Well this one will not get through without the mother of all battles.

83	10/11/2011	martyn	u'ren	london
84	10/11/2011	Suzi	Watford	London
85	10/11/2011	veronica	buffoni	zurich

Think of the UK residents who pay their taxes!! Not fair!! Why do we let these people not pay any tax then have to provide a place for them to live - i'm sure many low income families would benefit from the resource. I have lived in an area with such a 'camp site' or should I say rubbish tip and the impact on the local community is irreparable

86	10/11/2011	Emmanuelle	Marvy	London
87	10/11/2011	Boguslawa	Maj	London
88	10/11/2011	Becky	Hanbidge	Pinner
89	10/11/2011	Ines	Ashton	Maidenhead
90	10/11/2011	Alex	King	London
91	10/11/2011	Michelle	Hall-Hussain	Queensbury
92	10/11/2011	Lesley	Turnbull	London
93	10/11/2011	Mick	Belcham	Tunbridge Wells
94	10/11/2011	john	muggleton	london
95	10/11/2011	Jenny	Ackroyd	hebden Bridge

Visited relatives in Church Grove. Road totally unsuitable for such access. Will cause huge problems for current residents, not to mention prospective travellers. Not exactly joined-up-thinking from Lewisham Council....

96	10/11/2011	Fiona	Jardine	Leicester
97	10/11/2011	Marc	Elie	High Wycombe
98	10/11/2011	Laura	Anderson	London

All to do with totally unsatisfactory access and disproportionate intrusion for local residents.

Not only is the site against the Caravan Owners' Club's rules regarding the location of sites without proper access, the Local Authority's own guide lines regarding it being adjacent to a Conservation Area and in a flood plain which would mean that the Travellers' living there would not be able to insure their caravans.

But also, from the Council Payer's point of view it will not accommodate the number of Travellers that the Government has stipulated that the London Borough of Lewisham should provide for Travellers, so the Travelling community, which is made up of extended family groups, would be divided between a minimum of two sites. Using a larger site would be a far more appropriate. Then the land at the end of Church Grove and adjacent to 57 Ladywell Road could be used for a different purpose.

I understand that it has been considered as a site for a primary school and an allotment. for myself I would rather that the land were used to build another swimming bath in the Borough, one with a hydro pool so that disabled people and those who have had an injury could, after they have finished their 6 sessions of hydrothot

99	10/11/2011	Fionna	Wire	London
100	10/11/2011	Jeff	Pywell	London
101	10/11/2011	Alex	Manning	smith town
102	10/11/2011	Donatella	De lesa	London
103	10/11/2011	Sofia	Beckley	northwood
104	10/11/2011	katie	ackroyd	London
105	10/11/2011	Sam	Bould	London

This site was ruled out as unsuitable years ago, to move travellers here contravenes the council's own policies. Totally impractical

106	10/11/2011	jean	branch	london
107	10/12/2011	Val	Master	London
108	10/12/2011	Sarah	hyde	London
109	10/12/2011	Peter	Schofield	London
110	10/12/2011	Ren	Joseph	Catford
111	10/12/2011	BEL	GREEN	london
112	10/12/2011	Shaalinie	Sivalingham	London
113	10/12/2011	darius	ridge	merthyr tydfil
114	10/12/2011	june	broome	london
115	10/12/2011	Amy	Glover	London
116	10/12/2011	L	Gone	london
117	10/12/2011	Earl	Samuels	L:ondon

Have the council just chosen this site for travellers because access is too restricted and the foundations too poor to build another massive block of flats?

118	10/12/2011	elaine	bayley	london
119	10/12/2011	Atli	Gudmundsson	Harrow

I hope that Lewisham Council will find an alternative site that will actually provide the travellers with proper safe access which they deserve on land that is not a conservation area... and that the community of Church Grove are able to retain their safe access, which they equally deserve too.

120	10/12/2011	Alexy	Wilkinson	London
121	10/12/2011	Emma	Edkins	London
122	10/12/2011	Sandra	Shearing	Bournemouth

What a ridiculous place to put it. How are travellers to get their vehicles up there? How are residents to park their cars?

123	10/12/2011	Rosie	Morle	London
124	10/12/2011	Jonathan	Evans	Brockley
125	10/12/2011	kevin	mcmorrow	london

If travellers truly are living by their culture ie travelling, how are they supposed to travel up an down Church Grove whenever the urge to travel takes them? It does not have the access needed. Lewisham Council needs to make a proper decision and stick to it on the basis of safety and suitability. Enough public money has been wasted already. Thatcher's Britain!

126	10/12/2011	Janice	Perkins	Lake Mary	Florida
127	10/12/2011	Robert	Nicol	London	
128	10-13-2011	Richard	Davey	London	
129	10-13-2011	zohra	huda	london	
130	10-13-2011	Angus	Nisbet	Melbourn	
131	10-13-2011	chris	spinks	london	

A very poorly thought out scheme when it was proposed last time, it now makes no sense whatsoever.

132	10-13-2011	David	Hutchens	London
133	10-13-2011	Sophie	Hooper Lea	Bath

134	10-13-2011	piotr	lasek	London
135	10-13-2011	Julian	Norris	Blackheath
136	10-13-2011	Gill	Young	London
137	10-13-2011	S	huthwaite	London
138	10-13-2011	Alan	Patient	London
139	10-13-2011	Robin	Morgan	London
140	10-13-2011	barry	thornton	dagenham
141	10-13-2011	Rita	Smith	Plymouth
142	10-13-2011	Pat	Mitchehall	London
143	10-14-2011	Rupert	Harrison	Sevenoaks

Lewisham Council should seek to bring communities together not to continue to impose their ill thought out plan.

Lewisham Council needs to listen and try to understand why the residents of Church Grove are so absolutely opposed to this scheme

Insane idea from Lewisham Council. Travellers should not expect provision for lifestyle, otherwise why don't Lewisham fund me a house for my chosen lifestyle!

This is not a good site for travellers.

Why waste public money on another enquiry when this site has already been found unsuitable for travellers?

Although I am not a resident of Church Grove my son attended Watergate School when it was located there. Access for school busses and parents' cars was a constant problem causing dangerous situations and understandable tensions between the school and residents. This proposal would create a similar problems, with less predictable traffic flow than with a school.

144	10-14-2011	Lisa	Palin	London
145	10-14-2011	Deborah	Leggett	Perth
146	10-14-2011	chris	jordan	bideford
147	10-14-2011	chris	ward	Beckenham
148	10-14-2011	Adele	Prince	London
149	10-14-2011	Sonia	Forde	London
150	10-14-2011	wendy	mcguire	London
151	10-14-2011	Andrew	Flack	London
152	10-14-2011	Jo	Binding	London
153	10-14-2011	Fleur	Stoppani	London
154	10-14-2011	Nicole	Srinivasan	London
155	10-14-2011	Jonathan	Alpert	Bromley

Its time councils everywhere addressed the Travellers' issue and gave travellers a space which suited their needs, rather than the budgetary needs of the council. Stop taking short cuts, Lewisham Council, and start working at a solution which will suit all concerned: squeezing travellers in to this ridiculously small space is clearly not a solution. You'd think Dale Farm might have given you pause for thought? Good luck with the campaign, guys - thinking of you xx

I do not think the location fits the requirements

Totally stupid idea only Lewisham council could come up with something so daft

I lived in lewisham for over 15 years and it would be a pity to allow this to happen.

This is not the right site for this purpose. Completely appalling location

Road access is utterly unsafe for the travelling community.

Travellers in central London ? !!!

I have looked at the pictures, and it is quite clear that access is a severe problem even for residents' cars, let alone anything bigger. The proposal to give travellers a site here is therefore simply ludicrous.

Access & conservation area issues must be respected. This is the wrong location Absolutely ludicrous.

156	10-14-2011	Helen	Capstick	Southampton
157	10-14-2011	A	Pons	London
158	10-14-2011	ian	richardson	new cross
159	10-14-2011	Colin	Taylor	London
160	10-14-2011	Thomas	Mills	London
161	10-14-2011	G	Mehmet	Sidcup
162	10-14-2011	kathy	Spencer-lewis	london
163	10-14-2011	Gareth	Ellis	London
164	10-14-2011	Michael	Delaney	London
165	10-14-2011	K	Naylor	Margate
166	10-14-2011	Claire	Doyle	High Wycombe
167	10-14-2011	Darren	McCreery	London
168	10-14-2011	Gary	George	London
169	10-14-2011	Barry	L. Smith	London

170	10-14-2011	Susan	Skinner	Richmond
171	10-15-2011	Lucy	Lee	London
172	10-15-2011	Rosemary	Hattersley	London
173	10-15-2011	Adam	Ross	Ladywell
174	10-15-2011	Rachel	Ingram	London
175	10-15-2011	Christine	Watkins	kidderminster
176	10-15-2011	Bev	Crome	London
177	10-15-2011	Deirdre	Hetherington	Beckenham
178	10-15-2011	R	Witheld	London
179	10-15-2011	emma	peck	truro
180	10-15-2011	W	Sargent	London
181	10-15-2011	Carolyn	Harris	London
182	10-15-2011	C	Wilmot	London
183	10-16-2011	Matt	Lowry	London
184	10-16-2011	Anne	Dimuro	London

The access is the problem you will destroy this lovely place for lack of thought

I live very close to Church Grove. This is far from a suitable solution and needs a fair hearing from the public. The council is to serve the residents, please don't forget this.

Road is much to narrow for any access

Lewisham Council is not covering itself with glory here. What a waste of taxpayers' money - why didn't they put the new travellers site behind Laurence House, where there are no access problems?

185	10-16-2011	M	Glover	London
186	10-16-2011	Jo	Brookman	Pembroke
187	10-16-2011	tina	braithwaite	winchester
188	10-16-2011	Florence	McMullan	Winchester

189	10-16-2011	philip	davenport	winchester
190	10-16-2011	Ian	Wheeler	London
191	10-16-2011	Wendy	Lusk	Orpington
192	10-17-2011	chantal	coady	london
193	10-17-2011	o	TRUE	London
194	10-17-2011	sharon	kendall	london
195	10-17-2011	Gabriella	Vear	London
196	10-17-2011	Sue	Youthed	London
197	10-17-2011	Mick	McNeil	Risby
198	10-17-2011	Alexandra	Bono	London
199	10-17-2011	Clive	Brynley-Jones	Walberswick
200	10-17-2011	Doris	Brynley-jones	Walberswick
201	10-17-2011	Jo	Hall	london
202	10-17-2011	G	Harriss	london
203	10-17-2011	Dianne	Smith	Newtownards
204	10-17-2011	Colin	Garvey	London
205	10-17-2011	Richard	Harrison	Needingworth
206	10-17-2011	Robert	Sheppard	London
207	10-17-2011	D	Wailes	Ladywell
208	10-17-2011	Michaela	Wheeler	London
209	10-17-2011	Rebecca	Brown	London
210	10-17-2011	nicholas	cole	london
211	10-18-2011	Graham	Walters	Richmond
212	10-18-2011	Richard	Kernick	Aldershot
213	10-18-2011	David	Johnstone	Petersfield
214	10-18-2011	Gloria	Steemsonne	London
215	10-18-2011	Kelda	Belcham	Tunbridge Wells
216	10-18-2011	Fiona	Pitfield	London
217	10-18-2011	Brenda	King	London
218	10-18-2011	David	Albery	London
219	10-18-2011	Rick	Colls	London
220	10-18-2011	sally	Rogers	London
221	10-18-2011	MARYANNE	BANNON	belfast
222	10-18-2011	Nicholas	Springman	London
223	10-18-2011	Mike	Hurst	Beckenham
224	10-18-2011	nayelli	navarro-pollott	canterbury
225	10-18-2011	Paul	Fowler	Deal
226	10-18-2011	david	montgomery	lewisham
227	10-18-2011	Faye	Barnes	london
228	10-18-2011	E	Thompson	London
229	10-18-2011	Felice	Callans	Venice
230	10-18-2011	Emily	Mendleton	High Wycombe
231	10-18-2011	Shaun	Bertram	London
232	10-18-2011	Valerie	Weber	London
233	10-18-2011	chris	staples	london
234	10-18-2011	Jemma	Couchman	London
235	10-18-2011	Ellen	Broome	Sowerby Bridge
236	10-18-2011	Jordan	Colls	London
237	10-18-2011	O	Blanchet	London
238	10-19-2011	philip	bliss	London
239	10-19-2011	Brenda	Lanham	London
240	10-19-2011	Tom	Ellard	London

This proposal was nuts the first time around when it was eventually thrown out. Nothings changed

This is not an appropriate location for a site for anyone, the access is too narrow and the land liable to flood.

Part of this poor proposal is that there was a travellers site already in Lewisham, that got closed down by Lewisham for the building of flats. I guess the flats bring in a greater Council Tax take. You can't build flats in a conservation area or flood plain.

This is absolutely the wrong location for the site. Another example of Lewisham Council ignoring residents concerns and views.

it is ridiculous. It would be tricky to get my little hyundai amica into church grove never mind a caravan

Once again the Council is behaving in an amateurish way. This site fails the test on any number of grounds, including the common sense test. Time for local Councillors to step up to the plate and demonstrate some community leadership. I was against it last time and nothing has changed Anyone with a brain can see that this site is completely ridiculous for everyone, I can't believe the council think that this is worth persuing

These people have a lovely house and have worked for there local community surly this is not a just reward to inflict this on these nice people
This would be an unworkable idea and therefore it will spawn endless problems for the whole community in the future

While I understand that Councils are obliged to provide a travellers' site in every borough, I do not feel that the site proposed in Lewisham is inappropriate for local residents and the current infrastructure. Additional traffic, including people traffic, would be distructive for residents and the road does not lend itself to large vehicles entering and leaving (whether this happens regularly or just once or twice). There are other perfectly appropriate sites in other areas of the borough (e.g. behind Laurence House, parts of the car parks around Comet on the A21).

As long as nothing controversial happens next to areas where council officials live...

The site is clearly unsuitable and the Council's reluctance to concede this is bewildering. Even more disturbing has been their underhandedness in dealing with the residents of Church Grove. Count me in for the fight against this nonsense!
Th Council should have thought about an alternative site when they decided to destroy the old site. This is just knee-jerk reaction, it can't even pass for planning.

A totally inappropriate use of the land. I'm very concerned, given the small site and limited access that conflict may arise. Please think of the impact of those in Church Grove.

241	10-19-2011	Tahir	Hussain	Chesham	
242	10-19-2011	Jason	Dealey	Kennington	
243	10-19-2011	Ian	Richardson	Crawley	
244	10-19-2011	Tendayi	Chivero	London	
245	10-19-2011	Isabel	Fowler	London	
246	10-19-2011	K	Morgan	London	
247	10-19-2011	Jo	Mitchell	Lewisham	
248	10-19-2011	Laura	Harvey	London	
249	10-19-2011	Cheryl	Knight	London	
250	10-19-2011	Rachel	Barlow	London	
251	10-19-2011	Karen	Warren	London	
252	10-19-2011	Glenn	Sebright	London	
253	10-19-2011	Catherine	More	Sunnyside	New York
254	10-20-2011	francesca	sanlorenzo	london	
255	10-20-2011	Andrea	Webb	London	
256	10-20-2011	Rebecca	Armstrong	London	
257	10-20-2011	Kate	Price	London	
258	10-20-2011	Nicola	Cook	eltham	
259	10-20-2011	Andy	Roberts	london	
260	10-20-2011	Tracey	Warren	London	
261	10-20-2011	M	Smith	London	
262	10-20-2011	Kirsten	Scott	Lewisham	
263	10-21-2011	Kate	Harkus	London	
264	10-22-2011	Ian	Hughes	london	
265	10-22-2011	Zachary	Confino	Brockley	
266	10-22-2011	fiona	pywell	London	
267	10-22-2011	Nick	Ackroyd	Hebden Bridge	
268	10-22-2011	Jeff	Broome	Sowerby Bridge	
269	10-22-2011	Levi	Scott-Cooksey	London	
270	10-24-2011	Reisha	Collins	London	
271	10-24-2011	Theresa	Freeburn	London	
272	10-25-2011	Richard	Lewey	London	
273	10-25-2011	Peter	Hamm	London	
274	10-26-2011	Spenser	Lee	Newport	
275	10-28-2011	Matt	Frost	Ladywell	
276	10-28-2011	Juliet	Awor Sheppard	London	
277	10-30-2011	R	Hansell	LONDON	
278	10-30-2011	Caroline	Dowsett	London	
279	10-31-2011	Angela	George	LONDON	
280	11/01/2011	Liz	Nisbet	Melbourn	
281	11/02/2011	Paul	Adams	London	
282	11/02/2011	Malcolm	Dixon	london	
284	11/05/2011	david	silva	london	Alabama
285	11/05/2011	Souhaib	Haider	London	
286	11/06/2011	HANNAH	TIPPER	LONDON	
287	11/06/2011	Richard	Fanning	London	
288	11/07/2011	Stuart	Clark	London	

If anyone ever saw Thurston Road site, then they know what a state that always looked with junk and rubbish littering it! What's wrong with the Catford Dog Track!!!!!!!!!!!!!!!!!!!!!!
I truly hope this plan does not go ahead, but after the same council gave permission for the beautiful Art Deco Glue Factory to be knocked down - I don't hold out much hope. Good luck with the campaign.

While I sympathise with the need to find the travellers a site, I really do not think that this is the ideal position. On a practical note, access is so limited in such a small, narrow street. Beyond that, The road is a beautiful little gem, and people have chosen to live there because it is so lovely and have invested a lot to keep it that way - these are normal people who also have a right to live where they like. Does the council have no consideration for their feelings or concept of what an asset that little road is to the community?

Totally inappropriate location based upon traffic congestion and it being too small for a traveller site. This just isn't a sensible proposal and is causing local residents unnecessary stress and concern that an area we are investing in could be ruined by a poor planning decision.
Clearly an inappropriate site
totally inappropriate site
This site is clearly unsuitable in terms of access and size. Church Grove is a beautiful street which frankly could do without this proposed eye sore at the end of this! This must be suitable sites that suit all parties.
Can't see how this site is in any way appropriate. Good luck with the campaign.

I am Not against providing housing for people who need it and are entitled but I am against dirty tactics used by Lewisham council in order to cover up their own mis-handling and incompetence with regards to re-housing the travelling community. It is not very community spirited of Lewisham Council to treat any of its residents in such an underhand and dismissive way. IS IT EVEN LEGAL?????????
Utterly ridiculous. These people should house themselves like everyone else.
This is clearly not a suitable site for a travellers

Seems a completely illogical site to me.
This is not a suitable site.

No access, just not practical

I grew up in Ladywell Road and know the situation well. It is ludicrous to propose this as a travellers site and the whole process seems to be completely undemocratic.

Ludicrous site for travellers

Ridiculous idea, the street is so small.

A narrow street even for cars

Totally unsuitable for both parties, Lewisham council neglected its duty.

VERY POOR CHOICE THE ROAD CAN'T COPE WITH IT!
Can't see how this can be the most appropriate site in the borough.

289	11/07/2011	susan	sarna	london
290	11/07/2011	christine	bech	london

Church Grove cannot cope with existing traffic and the parking problems it generates. A traveller site at the end of the road would make an already difficult situation even worse. Access to our garage which is in an alley off Church Grove is frequently compromised with people parking across the entrance to the alley. Emergency vehicles would have difficulty getting down Church Grove on a good day - no chance on a busy congested day.

291	11/07/2011	Jon	Broome	London
292	11/08/2011	Salih	Kansoy	London

as a past resident of Church Grove who suffered my car being hit by a lorry driving down the road I am strongly of the view that this is an inappropriate use for the site at the end of this narrow cul de sac. A small site in a central location in a conservation area with very poor access is a most inappropriate use for this site...there must be a more appropriate site elsewhere in the borough. The council would never give planning permission for a use of this kind to a private applicant.

293	11/08/2011	Stephen	Collingwood	Croydon
294	11/08/2011	jack	gallastegui	london
295	11/08/2011	Alex	McCrinkle	london
296	11/08/2011	Marcos	Pereira	London

I work close to Church Grove and am astounded that this small site is being considered suitable for a site for travellers. It will effectively destroy the small community already living there.

Ludacris!

297	11/08/2011	Janet	Ramirez	London
298	11/08/2011	maggie	labrosse	london
299	11/08/2011	Tania	Hill	london
300	11/08/2011	sophie	picard	london
301	11/08/2011	daryl	henderson	Ladywell
302	11/08/2011	Diane	Berry	London
303	11/09/2011	Sonia	Kannengiesser	London
304	11/09/2011	Anthony	Birchley	London
305	11/09/2011	Andreas	Goldner	London
306	11/09/2011	Leyla	Akkara	London
307	11/09/2011	John	Mair	London
308	11/09/2011	Clea	Matthews	Wellington
309	11/10/2011	Lee	Robson	London
310	11/10/2011	Matthew	Thomas	London
311	11/10/2011	nicholas	Brunskill	London
312	11/11/2011	Elainne	Dalton	London
313	11/11/2011	Amanda	Rainger	London
314	11/11/2011	Sophie	Wheeler	London
315	11/11/2011	Peter	Hamm	London
316	11/11/2011	Ros	Townsend	London
317	11/11/2011	steven	edwards	London
318	11/12/2011	Allan	Adams	London
319	11/12/2011	Chirdeep	Tomar	London
320	11/12/2011	Mark	Osborn	London
321	11-13-2011	Arlene	Gopal	IONDON
322	11-13-2011	Krishna	Gopal	London

Apart from the absurdity of the limited access, which is clearly a real planning issue and should not be ignored or dismissed lightly by the Council, there are other issues at stake here. I have visited this street over the last ten years and been fortunate enough to experience its strong sense of community, with people from a wide range of backgrounds and ethnicity, something very rare for London. It is something to be valued and Lewisham Council should be using it as an example for the rest of the borough to strive for, not be enforcing a situation where at best the community will be severely strained, but more likely destroyed. Anybody with an ounce of common sense can see it is not the place for a site for travellers.

Popostrous!

323	11-13-2011	Simon	Rowland	London
324	11-13-2011	Madeleine	Lees	Stansted
325	11-13-2011	Murray	Buesst	London
326	11-14-2011	N C	Neary	London
327	11-14-2011	Valerie	Smith	London
328	11-14-2011	Julian	Watson	Lewisham
329	11-14-2011	Alyson	Hope	London
330	11-16-2011	Joseph	Hui	London
331	11-16-2011	Adrian	Short	London
332	11-16-2011	Clare	Garrad	London
333	11-16-2011	Alex	Moore	London
334	11-16-2011	Minnie	Copping	london
335	11-16-2011	Sonia	Watson	Lewisham
336	11-17-2011	Phil	Thirlway	London
337	11-17-2011	Mick	McNeil	London
338	11-17-2011	Paul	O'Donovan Rossa	Huntington Beach California
339	11-18-2011	John	Middleton	London
340	11-18-2011	Martin	Bailey	Beverley

A totally unacceptable and inappropriate place for a travellers' site. What a waste of council money in such difficult times. I am disgusted that the local community is being forced to go through this all over again. Learn from your mistakes don't keep making them!

341	11-18-2011	Val	Aldridge	London	My son lives in this road. Please turn down this application!
342	11-19-2011	andre	tallett	linoln	
343	11-19-2011	Stephen	Parkes	Tipton	
344	11-19-2011	anthony	middleton	lewisham	
345	11-19-2011	David	Clarke	Daventry	
346	11-20-2011	francesca	odell	london	Hope the council use common sense and stop this proposal,its a crazy idea.
347	11-20-2011	jeff	ashcroft	london	
348	11-21-2011	Pippa	Dell	London	
349	11-21-2011	James	Hatfield	Halstead	
350	11-22-2011	Tony	Reilly	cronton	
351	11-22-2011	Robert	Larkins	London	
352	11-22-2011	Dawn	Tebbutt	RUSHDEN	
353	11-22-2011	Garry	Evans	London	
354	11-22-2011	Sharon	Grant	London	
355	11-22-2011	Fran	Purdy	Hither Green	
356	11-22-2011	Jake	Leavesley	London	
357	11-22-2011	sarah	ford	St. Charlse	Missouri
358	11-23-2011	ANTHONY	BUTTON	EBBW VALE	
359	11-24-2011	Maxie	Hamilton	London	
360	11-24-2011	Alex	Ferrell	London	
361	11-24-2011	Viola	Orci	London	
362	11-27-2011	Jen	Shearer	Callander	
363	11-28-2011	Joanna	Hudd	London	
364	11-28-2011	Gemma	Machin	London	
365	11-29-2011	D	Jervis	London	A more unsuitable site would be hard to imagine.
366	11-30-2011	Sandra	Trapane	Lewisham	
367	11-30-2011	Norman	Turner	London	
368	12/02/2011	Lesley	Finch	sHOEBURY	
369	12/02/2011	Mark	Beaumont	London	
370	12/02/2011	John	Shenells	London	
371	12/02/2011	Joseph	Parker	London	
372	12/02/2011	Anthony	Collins	London	
373	12/03/2011	Ingrid	Glean	London	
374	12/03/2011	lucy	carrington	london	
375	12/03/2011	Raymond	Matthews	London	
376	12/03/2011	Sandra	Matthews	London	
377	12/03/2011	mihails	rudakovs	Lewisham	
378	12/03/2011	Hillel	Horwitz	London	
379	12/03/2011	natalja	rumjanceva	Lewisham	
380	12/04/2011	Phyllis	James	London	
381	12/04/2011	Josina	James	London	
382	12/04/2011	Patricia	Morgan	London	
383	12/04/2011	Mohamed	Elachkar	London	
384	12/04/2011	Somia	boudil	London	
385	12/05/2011	David	Keen	London	
386	12/05/2011	James	Coleman	Ladywell	
387	12/05/2011	Emma	Aye-Kumi	London	
388	12/05/2011	Claire	Gooden	London	
390	12/06/2011	Robert	Weston	london	
391	12/06/2011	Karren	Winchester	Kent	
392	12/06/2011	Haseeb	Malik	Epsom	
393	12/06/2011	Chris	Lambert	London	There are few pockets of genuine beauty in this area. Lewisham Council cannot have thought this through properly. If it goes ahead it will destroy a rare human habitat in the area. Shameful.
394	12/06/2011	Marion	Cromb	London	
395	12/06/2011	Georgia	South	LONDON	
396	12/06/2011	John	Webb	London	At some point the residents must be heard.
397	12/06/2011	Jonathan	Myles-Lea	Hereford	
398	12/06/2011	Grahame	Dovey	Croydon	
399	12/06/2011	Darran	Clare	hove	
400	12/07/2011	Denise	Borrmann	London SW166TZ	
401	12/07/2011	David	Haig	london	
402	12/07/2011	james	filer	sondon	
403	12/07/2011	Lavinia	Moore	Westcliff	
404	12/08/2011	Kim	Horwood	London	
405	12/08/2011	Tim	Arnold	London	
406	12/09/2011	Sarah	Curtis	London	
407	12/09/2011	Phuong	Leung	London	
408	12/10/2011	Jamie	Milne	London	
409	12/11/2011	Tim	Rowe	London	
410	12/11/2011	Dave	Williams	London	Lewisham council very rarley take the opinions of locals and is quite evident here.
411	12/11/2011	Ros	Orr	Ladywell	
412	12/12/2011	Tom	Harding	London	
413	12/12/2011	Liz	Carney	Orpington	
414	12/12/2011	BONNIE	TAYLOR	INDIANAPOLIS	Indiana
415	12-13-2011	Andreas	Petrilli	London	
416	12-13-2011	Sue	Marshall	london	
417	12-14-2011	Emma	Handy	london	
418	12-15-2011	Des	Sampson	London	
419	12-15-2011	Penny	Hosie	London	
420	12-15-2011	Tracey	Hurran	London	