

# **Lewisham Local Plan**

## **Regulation 18 Consultation Statement**

### **Report on the ‘Consultation on Main Issues’**

March 2020

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# 1 Introduction

- 1.1. Lewisham Council ('the council') is undertaking a review of its adopted planning documents and policies to inform the preparation of a new Local Plan. This new plan, once adopted, will update and replace the existing suite of local plan documents comprising the Core Strategy (2011), Site Allocations (2013), Development Management (2014) and Lewisham Town Centre (2014), bringing the new policies together into a single consolidated document.
- 1.2. This Consultation Statement sets out how the council has carried out early, meaningful and proactive engagement with local residents, community groups, businesses and other organisations and stakeholders in accordance with the National Planning Policy Framework (NPPF) and the relevant statutory requirements, as part of its Local Plan review.
- 1.3. Specifically, this Consultation Statement outlines the consultation and engagement activities that were undertaken for a preliminary Regulation 18 stage consultation, which culminated in a six-week public consultation in October and November 2015. This involved the following documents:
  - Lewisham Local Plan – Consultation of Main Issues;
  - Local Plan Sustainability Appraisal – Scoping Report; and
  - Infrastructure Delivery Plan – Framework Document.
- 1.4. The consultation activities on the above were undertaken in accordance with Lewisham's Statement of Community Involvement (SCI), and Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This Consultation Statement provides a summary of the consultation and engagement process undertaken and responses received. It also sets out how the feedback has informed the preparation of the draft Local Plan, including the 'Main Issues and Preferred Approaches' document.
- 1.5. This Consultation Statement focusses on the initial Regulation 18 stage consultation undertaken in 2015, the preliminary stage of the local plan review which addressed the 'Main Issues' informing plan preparation. The council will undertake a further Regulation 18 stage consultation on a 'Main Issues and Preferred Approaches' document in due course, for which a further Consultation Statement will be prepared. The Consultation Statements should therefore be read in conjunction with one another. Together, the two Consultation Statements will help to demonstrate how the council has carried out and responded to public consultation in line with the relevant statutory requirements.

## 2 Statutory requirements

- 2.1. The preparation of a new Local Plan must comply with the National Planning Policy Framework (NPPF) and the Town and Country Planning (Local Planning) (England) Regulations 2012 (“the Regulations”). Regulation 18 outlines the first steps that must be undertaken in preparing a local plan, including who needs to be notified, and how a local authority should consider feedback from engagement activities when preparing a draft Local Plan for submission to the Secretary of State for independent examination.
- 2.2. Plan making authorities must also comply with the consultation requirements of the NPPF (Para 15-16), which requires new local plans to be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees. This Statement outlines how the council has addressed these requirements through its Local Plan review, as set out in the following sections:
- **Section 3** provides an overview of what we consulted on;
  - **Section 4** provides an overview of the consultation strategy undertaken, and how we engaged with local communities and key stakeholders;
  - **Section 5** provides a summary of the feedback received during the preliminary consultation in October and November 2015; and
  - **Section 6** outlines how these consultation activities have informed the preparation of the Local Plan, including the Preferred Approaches document.
- 2.3. This report demonstrates how the London Borough of Lewisham have engaged and consulted with the community and relevant stakeholders over the period of consulting on the Local Plan – Consultation of Main Issues and associated documents.

## 3 What we consulted on

- 3.1. In preparing a new Local Plan for Lewisham, the council’s approach was to ensure that we consulted with our community early and proactively in the plan making process. To help inform plan preparation, including production of a Preferred Approach document, the council undertook a six-week consultation from Friday 9 October 2015 to Friday 20 November 2015 on the following documents: Lewisham Local Plan – Consultation on Main Issues; Local Plan Sustainability Appraisal - Scoping Report; and Infrastructure Delivery Plan – Framework Document. The following section sets out further details on each.

## **Lewisham Local Plan – Consultation on Main Issues**

3.2. The Lewisham Local Plan will be the key strategic planning document for the borough. It will set out the long-term planning and investment framework for Lewisham. It will provide the basis for delivering sustainable development in line with the National Planning Policy Framework (2019), and supporting the spatial development strategy for the region, as set by the London Plan. This document outlined the key planning issues that have arisen since the Core Strategy 2011 came into effect, which the new Local Plan would need to address.

3.3. Key issues included:

- Identifying the areas in the borough where growth is expected and how these areas are likely to change in order to accommodate that growth;
- The planning policies that will be used to assess planning applications in the future; and
- How a single comprehensive plan that will cover all relevant planning topics for the whole borough will supersede the current suite of local plans in the Local Development Framework.

## **Local Plan Sustainability Appraisal (SA) – Scoping Report**

3.4. The Scoping Report is the first stage in the preparation of a Sustainability Appraisal (SA), including a strategic environmental assessment (SEA), which assesses the economic, social and environmental impacts of a plan, and factors that can mitigate its impacts. The Scoping Report, as a technical review accompanying the Local Plan – Consultation of Main Issues, provides context on the potential impact and mitigation measures that could support the preparation of a Preferred Approach. The Scoping Report also provided a series of questions intended to guide consultation responses, which are outlined in **Section 5**.

## **Infrastructure Delivery Plan – Framework Document**

3.5. The Framework Document is the first stage in the preparation of an Infrastructure Development Plan (IDP), and establishes the context, scope, format, methodology and governance and delivery arrangements that are proposed to be adopted to support the growth envisaged in the new Local Plan. The purpose of the Framework Document was to help engage with infrastructure providers, neighbouring boroughs, the Mayor of London and others on issues relating to infrastructure planning in Lewisham.

3.6. A key issue raised in the Framework Document was how Lewisham can effectively plan for significant growth in a time of public sector austerity and cuts. The Document outlined the physical, social, and green infrastructure the borough would need to accommodate growth, along with a proposed Infrastructure Schedule.

## 4 How we consulted

4.1. This section outlines how the Council engaged with the community in accordance with Regulation 18 of the Regulations, and the guidance set out in Lewisham's Statement of Community Involvement (SCI). The SCI sets out how the Council will consult the community in the preparation of planning documents, and sets out a range of possible consultation methods to involve the community. A number of these consultation methods were adapted to meet the requirements and needs of the early issues consultation of the new Lewisham Local Plan.

### **Planning Consultation Database**

4.2. Over a number of years Council has developed and maintained a planning consultation database, which includes contact details of all relevant stakeholders and government agencies, as well as community groups and residents who had opted-in to be notified of consultation activities relating to the Local Plan. The database includes 'specific', 'general', and 'relevant' consultation bodies, as defined by the Regulations. Bodies notified for the Regulation 18 consultation outlined in this document can be found at **Appendix 1**.

4.3. This database was used to inform and encourage early and regular engagement with relevant and interested parties. Prior to the commencement of the consultation period, the stakeholders were invited via mail out and/or email to make representations on the exhibition material. The database was used to send two letters: one to notify the commencement of the consultation of the 'Lewisham Local Plan – Consultation of Main Issues' document, and another to notify specific agencies of the commencement of the consultation of the Sustainability Appraisal – Scoping Report. A sample of these letters can be found at **Appendix 2**.

### **Public access to consultation material**

#### Printed copies

4.4. Printed copies of the Local Plan – Consultation of Main Issues, Sustainability Appraisal – Scoping Report, and Infrastructure Delivery Plan – Framework Document were also made available at the following locations throughout the borough:

- Blackheath Village Community Library Service;
- Catford Library;
- Crofton Park Community Library Service;
- The Library at Deptford Lounge;
- Downham Library;
- Forest Hill Library;
- Grove Park Community Library Service;
- Lewisham Library;
- Manor House Library;
- New Cross Community Library Service;
- Pepys Community Library Service;
- Planning Information Office, Laurence House, Catford;
- Sydenham Community Library Service; and
- Torridon Road Library.

#### Online resources

- 4.5. Electronic versions of these materials were also made available on the 'Planning' section of Council's website (see **Appendix 3**), with a dedicated Consultation Portal allowing interested parties to complete the Questionnaire online. The Questionnaire is discussed later below.

#### **Press Notice**

- 4.6. A press notice was placed in the South London Press on 9 October 2015, coinciding with the first day of the consultation period. South London Press was chosen given its borough-wide audience, and an estimated circulation in 2015 of around 30,000. A copy of the notice can be found at **Appendix 3**.

#### **Questionnaire**

- 4.7. To assist respondents providing feedback on the 'Lewisham Local Plan – Consultation of Main Issues' document, a questionnaire was prepared to gauge support for a range of potential policies for the new Local Plan. Topic areas included: housing, employment, retail and town centres, transport, environment, urban design and conservation, and community facilities. Hard copies of the questionnaire were made available across Lewisham's library network, the Planning Information Office at Laurence House, and as an online form on the Consultation Portal. Copies of the questionnaire were also available at stakeholder meetings facilitated by Council Officers, and distributed at local ward assemblies that were held over the consultation period. The results of the questionnaire can be found at **Appendix 4**.

## Workshops and stakeholder meetings

4.8. As part of Council's commitment to actively engaging with the community, a number of forums and amenity societies have been established to provide a supported process for various members of the community to engage with Council on planning matters. During the consultation period, Council officers facilitated five stakeholder meetings to provide the opportunity for verbal feedback on the exhibition material:

	<b>Date &amp; Venue</b>
<b>Councillors</b>	Monday 19 <sup>th</sup> October, 7pm – 8.30pm, Committee Room 1
<b>Lewisham Pensioners Forum</b>	Tuesday 20 <sup>th</sup> October, 2.30pm – 4pm, Committee Room 4
<b>Young Mayor &amp; Young Advisors</b>	Monday 26 <sup>th</sup> October, 5pm – 7pm, Council Chambers
<b>Agents Forum</b>	Tuesday 27 <sup>th</sup> October, 2.30pm – 4pm, Committee Room 4
<b>Amenity Societies</b>	Thursday 5 <sup>th</sup> November, 7pm – 8.30pm, Committee Room 4
<b>Young Mayor &amp; Young Advisors</b>	Monday 16 <sup>th</sup> November, 5pm – 7pm, Council Chambers

4.9. Feedback received during these meetings is outlined in **Section 5**.

## Response methods

4.10. Respondents were able to comment and make representations via the following communication channels:

<b>Online</b>	via: <a href="https://lewisham-consult.objective.co.uk/portal/planning_policy">https://lewisham-consult.objective.co.uk/portal/planning_policy</a>
<b>Email</b>	at: <a href="mailto:planning.policy@lewisham.gov.uk">planning.policy@lewisham.gov.uk</a>
<b>Post</b>	to: Planning Policy, London Borough of Lewisham, 3rd Floor, Laurence House, 1 Catford Road, SE6 4RU
<b>Verbally</b>	Comments made by participants at meetings were taken down as notes.

## Response Format

4.11. Respondents were able to submit responses in their own format or they could complete the questionnaire both online, or by completing a hard copy.



## **Sustainability Appraisal Scoping Report Statutory Consultation**

- 4.12. Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a Sustainability Appraisal (SA) of each of the proposals in a Local Plan during its preparation. The SA involves identifying and evaluating a plan's impacts and assessing the social, environmental and economic effects to help ensure that the plan accords with sustainable development principles. Scoping forms the initial stage of the SA process and incorporates the collection of baseline data and information on other plans, policies and programmes that can influence the preparation of the Gypsy & Traveller Site(s) Local Plan. The data presented in the Sustainability Appraisal Scoping Report identified key sustainability issues, objectives and targets.
- 4.13. The Council consulted on the SA Scoping Report at the same time as consulting on the Regulation 18 Consultation Report. It was, likewise, published on the website and the consultation portal, and copies were made available at all the borough libraries and at the Planning Information Office at Laurence House.
- 4.14. The 'Sustainability Appraisal Scoping Report' was sent to the following authorities with environmental responsibilities, as well as adjoining local authorities, and those that participate in regular Duty to Cooperate meetings:
- Environment Agency
  - English Heritage
  - Natural England
  - Greater London Authority
  - London Borough of Greenwich
  - London Borough of Southwark
  - London Borough of Tower Hamlets
  - London Borough of Bromley.

## 5 Consultation feedback

5.1. Over the exhibition period, a total of 29 questionnaires were completed and returned, with a further 41 representations made on the Local Plan consultation document. Four (4) responses were received in relation to the Sustainability Assessment Scoping Report, and seven (7) responses to the Infrastructure Delivery Plan Framework document.

5.2. During the consultation period five stakeholder meetings were facilitated for local forums and amenity groups. A summary of the feedback provided is outlined below.

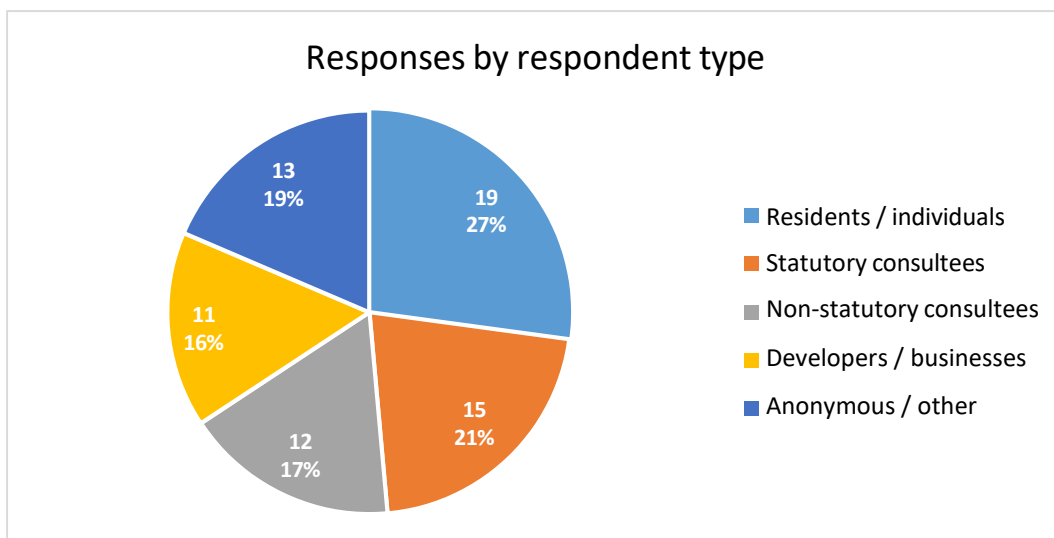


Figure 1 Percentage of responses by respondent type (questionnaire and written representations combined).

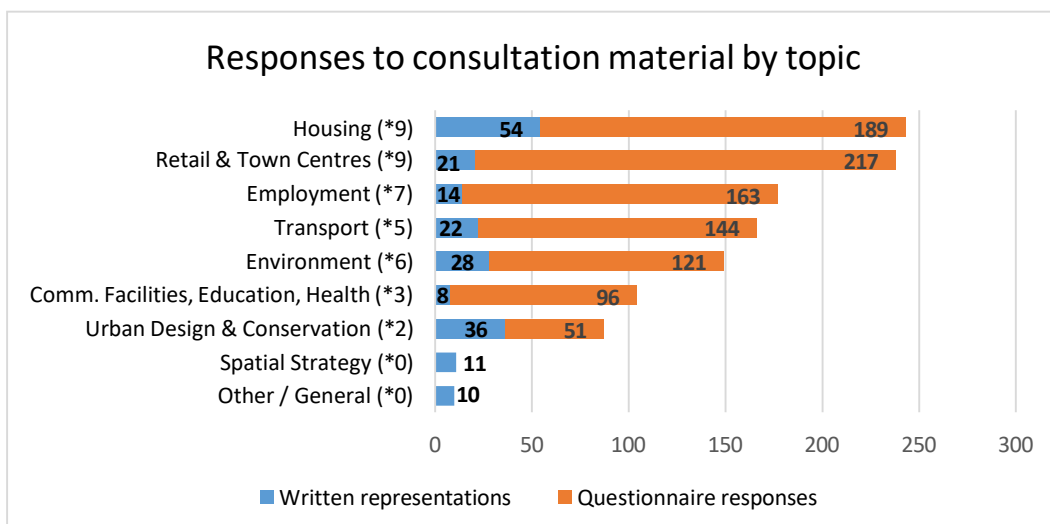


Figure 2 Response to consultation material by topic. (\*) denotes number of questions in Consultation Questionnaire for each topic.

## Consultation Questionnaire

5.3. Over the course of the consultation period, 29 questionnaires were completed and returned. A detailed analysis of the survey results can be found in the Consultation Questionnaire Outcomes Report at **Appendix 4**. The following provides a summary of the outcomes by main topic area.

### 5.4. Feedback on housing issues

- Respondents were slightly more in favour of developing sites in industrial areas or town centres to in-fill development in existing areas of private housing. However, this was not a strongly held view. A number of respondents were also open to explore ways that existing residential areas could accommodate intensification, provided the scale was proportionate to the existing character of the area.
- Conversation areas, areas near schools, and existing high density areas were identified as not being appropriate for additional housing.
- Supporting self-build projects and making viability reports publicly available were favoured approaches to increase the amount of affordable housing delivered by private housing developers.
- Respondents strongly supported Council retaining or increasing its affordable housing target of 50%, with less than one in five respondents supporting a lower target.

### 5.5. Feedback on employment issues

- There was strong support for Council continuing its strategy of allowing poorer quality industrial and warehousing land to be redeveloped for housing, as well as co-locating housing and employment uses into new development schemes.
- Respondents were very supportive of Council having a pro-active role in supporting start-up businesses, including by making available low cost space for pop-up stores.
- High speed broadband was considered to be a valued utility that will support businesses in the future.
- Two-thirds of respondents supported the creation of business incubators to support starter businesses.

### 5.6. Feedback on retail and town centre issues

- Allowing a wider range of entertainment and leisure uses, including short term pop-up stores, was supported to maintain the viability of Major and District Town Centres.

- There was strong support for limiting the number of new betting shops and hot food takeaways in all areas of the borough.
- There was no consensus as to whether Council should have a plan to manage the orderly decline in the number of shops in smaller centres.
- Respondents supported the retention of convenience stores, hairdressers, newsagents, pubs, and independent corner stores with groceries and food in local shopping parades to maintain their local function.
- Approximately one-third of respondents supported Lewisham becoming a Metropolitan Town Centre.

#### 5.7. Feedback on transport issues

- Approximately one-third of respondents thought that higher density development should be located only in areas with good public transport, suggesting that a more dispersed strategy could be supported.
- There was support for all new developments being required to prepare travel assessments and travel impact statements to manage traffic impacts.

#### 5.8. Feedback on environmental issues

- Of the responses received, there was a strong view that the consultation document did not adequately address a range of climate change issues, including higher and unseasonable temperatures, CO2 emissions, and renewable energy and decentralised energy networks.
- There was strong support for protecting all open space from development. The role of open space in promoting healthy lifestyles and leisure opportunities, as well as its role in regulating temperature and rain water drainage were identified by respondents as positive reasons to protect existing open space.

#### 5.9. Feedback on urban design and conservation issues

- There were mixed views as to whether Council, in taking a varied approach to achieving high quality design based on the existing character of an area, was working in practice.
- There was support for Council creating policies to protect the special characteristics of residential areas that were not located in Conservation Areas.

#### 5.10. Feedback on community facilities, education and health issues

- Promoting mixed use developments (co-locating housing and schools on one site) and requiring developers to ensure that these facilities are provided to support demand created by additional housing were two strategies viewed favourably by respondents.
- There was near unanimous support for the future Local Plan encouraging the use of community facilities for more than one group to maximise its value to the community.

#### **Workshops and stakeholder meetings**

5.11. The Council organised a series of public consultation events to proactively engage with residents, businesses and local amenity societies. The comments received during these events have helped to shape the new draft Local Plan – Main Issues and Preferred Approaches document.

##### Lewisham Members workshop

19<sup>th</sup> October 2015

5.12. Council Members were invited to attend a workshop at Civic Suite, Catford, on the Main Issues document and associated material.

5.13. Key issues raised included:

- Local hub designations in the Spatial Strategy;
- Suggestions made on how to improve the delivery of affordable housing at social rent rates, and the definition of “affordable”;
- Specialist housing for people with mental health issues;
- Issues with the existing policy on conversion of large houses to flats;
- Ongoing loss of employment floor space in the borough;
- Need for better public transport, particularly in the south of the borough;
- Concern over changes to the permitted development regime, and the potential impact on Conservation Areas.

##### Young Mayor and Young Advisors meetings

26<sup>th</sup> October and 16<sup>th</sup> November 2015

5.14. The young mayor, along with their young advisors, is an initiative that provides a channel for young people’s views to be heard by decision makers. The role of the young mayor is to support, and be a spokesperson for the borough’s young people, as well as inform and advise the mayor on issues relating to young people.

5.15. Key issues raised included:

- The importance of quality housing for young people, and the link to housing and educational achievement;
- Lack of alternative form housing to meet the needs of younger people (campus style/dorm beds). Under 18 year olds are often refused housing. Lack of housing for under 18s and vulnerable people;
- The role Council can play in using its buildings and spaces to support employment and business in the borough;
- The need for more jobs in high skill sectors to locate in Lewisham;
- Projects and grants needed to encourage start-ups;
- Suggestions on improvements to public transport links, cycling routes and the need for secure cycling storage;
- The need for additional parking and issues with parking permits;
- Quality of architecture in new buildings has to improve, with no difference between market and social housing;
- Innovative ways to provide low-cost accommodation and temporary housing to reduce homelessness;
- Lack of affordable community facilities, including football pitches.

Lewisham Pensioners Forum

20<sup>th</sup> October 2015

5.16. The Lewisham Pensioner's Forum is a community group that provides a platform for Lewisham residents over the age of 50 to advocate to local and national government on issues that impact the lives of pensioners in the borough.

5.17. Key issues raised included:

- Suggestions made on how the Local Plan can encourage new forms of housing for the elderly, including retaining HMOs that were well designed;
- Discussion on how local residents can get priority in accessing new housing over international investors;
- Vacant housing;
- Improving security in the private rental market, similar to countries such as Germany;
- Ecological impacts of backland developments;
- Need for more community facilities, especially for younger people;
- Lack of public toilets in town centres and the impact this has on elderly people;
- Deficit of disabled parking;
- Resisting the conversion of offices to residential.

### Agents Forum

27<sup>th</sup> October 2015

- 5.18. A meeting with local estate agents, architectural practices, and environmental services and property management businesses was held in Civic Suite, Catford, on 27<sup>th</sup> October 2015. The meeting took the form of a presentation by Council officers on the main planning issues confronting the borough, a presentation of the consultation material, followed by an open floor 'Q&A' on the presentation.

### Amenity Societies meeting

5<sup>th</sup> November 2015

- 5.19. A meeting for Lewisham's Amenity Societies was held on 5<sup>th</sup> November 2015. Members from the Lee Manor Society, A Better Lee Green, Lee Forum, Grove Park Neighbourhood Forum, the Sydenham Society, Culverley Green Residents Association, the Users and Friends of Manor House Library, DNA Neighbourhood Forum, and the Brockley Society attended.

- 5.20. Key issues raised included:

- Difficulty in delivering affordable housing due to viability constraints;
- Option of imposing penalties on vacant properties to encourage being brought back into use;
- Absence of Grove Park as a Local Hub in the Spatial Strategy;
- Discussion on the issues around the proposed redevelopment of Leegate Shopping Centre.

### **Duty to Cooperate**

- 5.21. In accordance with Council's statutory duty to cooperate through the plan making process, numerous meetings with neighbouring boroughs and other public organisations have taken place to discuss the preparation of Lewisham's new Local Plan, and cross-boundary issues. These meetings provide an opportunity to collaborate with relevant partners and bodies to identify and resolve strategic planning matters.

## 6 Summary of main issues raised by respondents

6.1. The following section provides a summary of issues raised through written representations during the consultation period, and how this feedback has informed the preparation of the new draft Local Plan – Preferred Approach.

### Representations received on Local Plan – Consultation of Main Issues

6.2. A total of 41 written representations were made on the Main Issues document during the consultation period. These covered a wide range of planning issues and detailed policy matters.

6.3. The table below provides a summary of the representations received on the Main Issues consultation, organised by key planning policy issue. It also sets out the council’s response to these representations, focusing mainly on how the feedback has been taken into account in the preparation of the draft Local Plan Main Issues and Preferred Approaches document.

	<b>Policy issue</b>	<b>Summary of issue</b>	<b>Council response</b>
1	Spatial Strategy	The new Local Plan needs to spell out clear criteria for ‘new development and intensification of development in district and local hubs’.	The draft Local Plan sets out a new spatial strategy for the Borough, and it is not proposed to retain the existing Core Strategy approaches and policies for ‘district and local hubs’. However, the draft plan aims to establish a clear strategy and policies to deliver sensitively managed growth and intensification throughout the Borough, particularly to meet identified local needs (such as for housing, workspace and community infrastructure).
2	Spatial Strategy	Grove Park should be designated a Local Hub.	The draft Local Plan sets out a new spatial strategy for the Borough, and it is not proposed to retain the existing Core Strategy approaches and policies for ‘local hubs’. However, the draft plan aims to establish a clear strategy and policies for delivering inclusive, healthy and liveable neighbourhoods across Lewisham, including Grove Park. Further details are set out in Part 3 of the draft plan.



3	Urban design and conservation	The heritage significance of buildings and assets should be given equal weight to the delivery of housing.	The local plan will set out a positive approach to managing the historic environment, in line with the National Planning Policy Framework, with policies that seek to preserve and enhance heritage assets and their setting, as well as avoid harm to them. The scale of growth that must be planned for to respond to local needs, including for housing, is recognised. The draft Local Plan will therefore be underpinned by a character-led approach to managing growth, helping to ensure that new development positively responds to its local context and Lewisham's local distinctiveness.
4	Urban design and conservation	Greater clarity needs to be provided on how the historic environment, in particular historic buildings and places, can be retained and used successfully for alternative purposes.	The draft Local Plan includes policies to support the sensitive re-use and adaptation of historic buildings and other heritage assets, also referring relevant guidance published by Historic England. The draft plan also includes a new policy on 'enabling development' to help secure the future of heritage assets.
5	Urban design and conservation	Any future draft policy on tall buildings should not prevent the ability to bring forward tall buildings in appropriate circumstances in town centres.	A Tall Buildings Study has been prepared to support the preparation of the draft local plan, and in particular the approaches to managing building heights within the Borough. The study will be considered alongside other evidence and assist in the identification of locations that may be acceptable in principle for tall buildings.
6	Urban design and conservation	There is a need to develop formal guidelines controlling excavation for basements, particularly in conservation areas.	The draft Local Plan includes a new policy on basement development, along with a refreshed suite of policies dealing with management of the historic environment.
7	Urban design and conservation	Small building alterations and Article 4 regulations are not upheld, and are diminishing the value of conservation areas.	The Local Plan will seek to preserve and enhance the significance of heritage assets and their setting, including conservation areas. It includes a refreshed suite of policies to support this aim. Article 4

			Directions are a tool to assist the council in positively managing the historic environment, but are outside the scope of the Local Plan.
8	Urban design and conservation	More specific policies are required on rear extensions in conservation areas.	The draft Local Plan includes a refreshed suite of policies addressing residential extensions. The council has also published a new Alterations and Extensions Supplementary Planning Document to provide further guidance in respect of this type of development.
9	Urban design and conservation	Support for the creation for the new designation 'Areas of Special Local Character', but only if this doesn't undermine or loosen the controls and protection enjoyed in existing conservation areas.	The Areas of Special Local Character is an existing local plan designation. These areas are defined as 'non-designated' heritage assets. The draft Local Plan seeks to provide greater clarity around this designation and how new development should positively respond to these areas.
10	Urban design and conservation	To achieve the maximum practical use of sites, residential developments need to be taller, with more attention to the quality of urban design.	A Tall Buildings Study has been prepared to support the preparation of the draft local plan, and in particular the approaches to managing building heights within the Borough. The study will be considered alongside other evidence and assist in the identification of locations that may be acceptable in principle for tall buildings. The draft Local Plan seeks that development delivers high quality design and the optimal use of land – however this does not necessarily imply that higher density or tall building development is appropriate in all locations. The draft Local Plan aims to provide further clarity around this issue.
11	Urban design and conservation	The conditions and restrictions for additional development on infill site, backland sites and back gardens are of key importance and should be retained.	Given the significant need for new housing within the Borough, the Local Plan will take a positive approach to the development of infill and backland sites, along with protecting back gardens from inappropriate development. The Local Plan includes a refreshed suite of policies

			addressing these types of sites, to help ensure new development is sensitively integrated within its local context. The council has also published a new Alterations and Extensions Supplementary Planning Document to provide further guidance in respect of this type of development.
12	Urban design and conservation	High rise buildings should not be permitted beyond Lewisham and Catford, and large developments in residential areas should be restricted.	A Tall Buildings Study has been prepared to support the preparation of the draft local plan, and in particular the approaches to managing building heights within the Borough. The study will be considered alongside other evidence and assist in the identification of locations that may be acceptable in principle for tall buildings. The draft Local Plan seeks that development delivers high quality design and the optimal use of land – however this does not necessarily imply that higher density or tall building development is appropriate in all locations. A blanket restriction on tall buildings outside of Lewisham and Catford centres is not considered to be appropriate or consistent with national policy.
13	Housing	Lewisham’s approach to securing affordable housing policy is ambitious, but it must not restrict the delivery of housing overall.	A Viability Study has been prepared to support preparation of the draft Local Plan, including policies on affordable housing. Informed by this evidence, the plan sets out requirements which the council considers will not adversely impact on the viability of development.
14	Housing	The proposed requirement of 50% affordable housing, and the requirement for a contribution for developments less than 10 units is over and above the London Plan, and will significantly impact on the viability of development in the borough.	The draft Local Plan sets out a strategic target for 50 per cent affordable housing to be delivered across the Borough. This requirement will not necessarily apply on a site by site basis, however the council will seek that the maximum amount of genuinely affordable housing is delivered. The plan also proposes to require a contribution for affordable housing on schemes of less than

			10 units. This new requirement has been set having regard to findings of a Viability Study.
15	Housing	Land adjoining rail corridors provide opportunities for new housing, and should be considered as potential sites in the new Plan.	Railways are often adjoined by 'green corridors', where land is protected nature conservation interests or open space. The council has considered a wide range of potential development sites in preparing the portfolio of site allocation policies, including sites identified through public 'call for sites' exercises. Land adjoining / adjacent to railways has been allocated and/or designated for development, where this is considered appropriate.
16	Housing	The new Local Plan needs to identify and set policies to address the need for specialist older person's accommodation.	The draft Local Plan includes a specific policy on older person's accommodation. This takes into account the housing needs for this group, as identified by the latest Strategic Housing Market Assessment, along with the indicative target for older person's accommodation in the London Plan.
17	Housing	Bellingham Leisure Centre could be suitable for a residential led mixed use development.	Noted. This site has been considered through the site allocations process.
18	Housing	The new Local Plan should retain policies that resist the conversion of larger dwellings into flats, and would urge the expansion of this policy to include 3 bed flats and HMOs.	The draft Local Plan will continue to seek to protect against the loss of family housing through residential conversions. However, some flexibility is proposed to be applied where a family housing unit is retained. This will help to ensure that additional housing can be delivered locally, whilst ensuring provision of family units. A new policy approach is proposed for HMOs, taking into account the emerging Article 4 Direction to manage this type of use in the south of the Borough, and in response to the emerging issue around large scale HMOs.
19	Housing	When assessing tower block applications, considerations such as the need for social support, communal and	The draft Local Plan seeks to ensure that all new development is appropriate to its location, designed to a high quality

		community facilities, specialist housing need, and local facilities (public toilets, libraries) should be part of the assessment criteria.	standard and is supported by infrastructure. A new policy on building heights is proposed to address detailed matters in respect of the development of tall and taller buildings.
20	Employment	Railway arches provide a significant opportunity to accommodate a wide mix of employment uses, however depending on their location other non-commercial uses may also be appropriate. Policies should allow for a flexibility of uses that are compatible with the local area.	The draft Local Plan includes a new policy on railway arches, recognising the opportunities to make a more optimal use of this type of land, whilst ensuring the nature of use is appropriate to its location.
21	Employment	Council should use its available powers to prevent the conversion of offices to dwellings.	Noted. Planning legislation enables the conversion of a B1 office use to C3 dwelling house through the prior approval process. The council may in the future consider the use of an Article 4 Direction to remove this permitted development right. However, this matter is considered to be outside the scope of the Local Plan.
22	Employment	Lewisham lacks a tourism industry, and more should be done to promote local assets. This could include Lewisham having a local museum.	The draft Local Plan includes policy proposals that seek to grow the visitor economy as an integral part of the local economy. This includes new designations for night time economy clusters and cultural quarters, along with support for town centres and other visitor destinations, such as parks and open spaces. The draft plan also includes a refreshed policy on visitor accommodation.
23	Retail and town centres	It is noted that Council's aspiration is for Lewisham Town Centre to become a Metropolitan Centre, however Bromley Town Centre currently successfully fulfils the role of Metropolitan Town Centre for the south-east sub-region with an area action plan to strengthen that role to 2026.	The scope for Lewisham Town Centre to be designated as a Metropolitan Centre is set out in the London Plan. The objectives for Lewisham Town Centre set out in the draft Local Plan are considered to be in general conformity with regional planning policy.
24	Retail and town centres	Policies should clearly state that affordable retail space is only to be provided on large scale retail developments, and that there is	Noted. The draft Local Plan does not propose requirements for affordable retail space.

		no basis to retrospectively impose this requirement on existing retail units.	
25	Retail and town centres	Catford needs to improve its retail offer, and redevelopment needs to ensure the Town Centre is better integrated.	The draft Local Plan seeks to deliver the comprehensive regeneration of Catford major centre to ensure its long-term vitality and viability.
26	Retail and town centres	Council should retain its existing policy that limits the number of fast food takeaway shops near schools to address the obesity problem in Lewisham.	The draft Local Plan proposes to retain the current adopted approach to managing the development of hot food takeaways.
27	Retail and town centres	More needs to be done to support and contribute to the night time economy.	The draft Local Plan seeks a more proactive approach to supporting and facilitating the growth of the night time economy as an integral part of the local economy. This includes the proposed designation of new night-time economy hubs, along with a more flexible approach to encourage a wider range of uses within town centres (including leisure and cultural uses).
28	Retail and town centres	The new Local Plan should consider the regeneration scenario prepared for the Kirkdale High Street (Willow Way) that was part of the SEE3 Portas Pilot project.	The draft Local Plan introduces a revised suite of policies that seek to respond to the current challenges facing Lewisham's high streets, with the aim of securing their long-term vitality and viability. In addition, the draft plan makes specific proposals in respect of the regeneration and renewal of the area around Willow way, including the employment site and high street.
29	Retail & Town Centres	A review is needed on the number of licensed premises operating, or extending their trading hours, to ensure there is a balance between maintaining a vibrant social centre and preserving the qualities that make villages an attractive place to live.	The matter of operating hours is addressed through policies dealing with amenity. It is agreed that a balance must be struck in terms of maintaining the vitality and viability of town centres whilst ensuring protection of local amenity.
30	Community facilities	Council policies restricting the change of use of health facilities should not unnecessarily restrict the ability of the NHS to manage its estate in a flexible manner.	The Local Plan will continue to seek to ensure there is sufficient infrastructure in place to support existing neighbourhoods and the levels of future growth planned in the Borough. The draft plan includes policies to ensure a pragmatic and flexible in

			approach is taken with respect to development proposals involving the public estate, consistent with the London Plan.
31	Community facilities	The new Local Plan should specifically reference indoor and outdoor sports facilities, and have policies that prevent the loss of sports facilities and land. New sports facilities should also be planned for and provided in growth areas.	The Local Plan will continue to seek to ensure there is sufficient infrastructure in place to support existing neighbourhoods and the levels of future growth planned in the Borough. The draft plan includes policies to protect against the loss of community infrastructure, including sports facilities. An Infrastructure Delivery Plan is being prepared alongside the Local Plan, and requirements for new provision will be considered in response to this document.
32	Community facilities	LB Bromley is identifying sites for expansion or construction of new schools, but it is not anticipated that additional capacity created will be sufficient to absorb demand from adjacent boroughs.	Noted. The draft Local Plan will continue to seek to ensure there is sufficient infrastructure in place to support existing neighbourhoods and the levels of future growth planned in the Borough. An Infrastructure Delivery Plan is being prepared alongside the Local Plan, taking into account the latest evidence for School Place Planning, and requirements for new provision will be considered in response to this document.
33	Community facilities	Given the significant housing uplift that can be achieved in the regeneration of Catford, a flexible approach should be taken to the provision of on-site or off-site community, education or health facilities, to ensure the viability of the scheme.	The draft Local Plan will continue to seek to ensure there is sufficient infrastructure in place to support existing neighbourhoods and the levels of future growth planned in the Borough. An Infrastructure Delivery Plan is being prepared alongside the Local Plan, and requirements for new provision will be considered in response to this document. Where on-site provision is considered necessary to support the delivery of the spatial strategy for the Borough, this will be set out in site specific policies.
34	Community facilities	There is no reference in the consultation material on the role of public houses. Pubs should not be allowed to be converted	The draft Local Plan includes policies that will continue to protect public houses as important community facilities,



		or demolished for residential use.	and prevent against their loss, including through conversion to other uses, such as housing. A revised policy is proposed to provide greater protection to pubs.
35	Environment	New Local Plan will need to consider future upgrades to flood defence infrastructure, particularly along the Thames River, and provide adequate building setbacks to allow for vehicle access for maintenance and repair.	An update to the Strategic Flood Risk Assessment (SFRA) has been prepared to inform the new plan, drawing on the latest available information. Environment Agency and other stakeholders have been engaged on the production of the SFRA. The draft Local Plan sets out revised strategic approaches to managing waterways and reducing flood risk. We will continue to liaise with key stakeholders through the plan process to ensure the policies are robust.
36	Environment	There needs to be policies that protect Lewisham's open spaces and encourages the inclusion of urban greening to improve amenity, and address the urban heat island effect.	The draft Local Plan includes a refreshed suite of policies dealing with 'green infrastructure' (including open spaces) as well as climate change adaptation and mitigation. The plan broadly seeks to protect and enhance Lewisham's network of green infrastructure, with greater emphasis on urban greening measures in new development.
37	Environment	The new Plan should provide a policy dealing with water and sewerage infrastructure to comply with national planning policy and guidance.	The draft Local Plan includes a revised suite of policies dealing with water management, including wastewater and water supply. The Local Plan provides policies to support the delivery of the Thames Tideway Tunnel.
38	Environment	Lewisham is below the London average for access to a 2ha woodland within 500m of people's homes.	Noted. A new Open Space Assessment and Sites of Importance for Nature Conservation Study have been prepared to inform preparation of the Local Plan. It is recognised that some areas of the Borough are deficient in certain types of open space and access to nature conservation sites. In light of this evidence, the draft Local Plan includes policies to enhance existing provision, as well as to improve access to spaces,



			whether within or outside the Borough. Given the need to accommodate significant amount of growth over the plan period, there are very limited opportunities to create significant areas of new open space and woodland.
39	Environment	Large scale redevelopments such as Leegate Shopping Centre and Lewisham Town Centre should be required to include reasonable amounts of new public open space as part of their design.	The draft Local Plan seeks to ensure that new developments, and particularly major development proposals, maximise the provision of public open space. The draft plan includes site allocation policies for the Leegate Shopping Centre and Lewisham Town Centre, and which seek that developments make provision of new and enhanced public realm and open space.
40	Transport	The re-routing of the Catford Gyratory should not undermine the ability to deliver a comprehensive redevelopment of the Catford Island Retail Park.	The re-alignment of the South Circular (A205) is necessary to facilitate the comprehensive regeneration of Catford major centre, ensuring its long-term vitality and viability. It is not considered that the redevelopment of the Retail Park will be compromised as a result of the road re-alignment. The Local Plan will seek to ensure a coordinated approach to redevelopment of major sites within the area, and the council will prepare an area Masterplan to support this process, providing additional guidance to support the Local Plan policies.
41	Transport	Development sites close to the Bakerloo Line Extension has the capacity to accommodate significantly higher levels of housing than is currently indicatively proposed.	The draft Local Plan seeks to facilitate the delivery of the Bakerloo line upgrade and extension to Lewisham, consistent with the draft London Plan. It includes policies to help ensure that the optimal capacity of sites is realised, taking into account existing and planned future transport infrastructure and corresponding levels of public transport accessibility.
42	Transport	The proposed protection and restoration of rivers, including Deptford Creek, as valued	The draft Local Plan sets out policies addressing water management, including in the

		heritage assets is noted, however there is no explanation as to how these corridors have the potential to promote water transport (passenger or freight).	Thames-side area. The use of the river Thames for passenger based transport will be broadly supported, with specific site allocation policies that support the delivery of infrastructure to facilitate this.
43	Transport	More thought needs to be given to the full implications of zero parking developments. While supported in principle, it appears that the implications for parking in surrounding areas, and the impact of additional service traffic (home delivery vans and taxis) have not been considered.	The draft Local Plan broadly seeks to facilitate modal shift from vehicle use to other sustainable modes, including walking, cycling and use of public transport. A carefully managed approach to parking will need to be taken, and the draft policies aim to strike a balance between encouraging modal shift and ensuring development is appropriately supported by parking provision. The plan proposes to apply the London Plan parking standards. Some elements of parking control are outside of the Local Plan (e.g. CPZ).
44	Transport	More provision for cycling as both a leisure activity and commuting is needed.	The draft Local Plan broadly seeks to facilitate modal shift from vehicle use to other sustainable modes, including walking, cycling and use of public transport. It provides for a renewed emphasis on making more opportunities available for walking and cycling, and sets clear delivery objectives in this regard.
45	Transport	Increased frequency of the Catford Loop Line is needed to support growth.	This matter is outside the scope of the Local Plan. Frequency or services is dealt with separately by rail operators. The Local Plan broadly seeks to facilitate significant investment in strategic transport infrastructure, including the Bakerloo line extension, to improve accessibility and appropriately support planned growth.
46	Other infrastructure	There needs to be a specific telecommunications policy in the new Local Plan.	The draft Local Plan includes a new policy on digital connectivity, including consideration for telecommunications.

## Representations received on Infrastructure Delivery Plan – Framework Document

Seven (7) responses were received during the consultation period. A detailed summary of the issues raised is set out in the table below.

	<b>Submission Author</b>	<b>Response summary</b>	<b>Officer response</b>
1	Environment Agency	LB Lewisham should be identified as a delivery partner for flood risk projects.	Noted.
1	Environment Agency	Minor amendments proposed to update / revise descriptions of proposed scope of works and costs for various flood alleviation schemes to be delivered by EA in partnership with LB Lewisham.	Amendments noted, descriptions will be updated in future draft IDP.
2	Historic England	The Plan provides an opportunity to implement the Council's 'strategy for the historic environment' by naming projects that are planned to be implemented in the life of the local plan; further, to identify potential public realm and highway improvements where they coincide with conservation areas that are on the Historic England Heritage at Risk Register.	Noted.
		Propose the inclusion of Beckenham Place (at risk grade II*) as part of the IDP.	Noted.
3	Office of Rail & Road	Agency noted the consultation and have no comment at this stage of the Local Plan production process.	Noted.
4	Sport England	Sport England advocates that new developments should contribute to the sporting and recreational needs of the locality made necessary by their development.  However, Sport England is not aware of a robust evidence base for playing pitches and indoor sports facilities for Lewisham. It is not clear how this lack of evidence base has been/will be taken into account to develop this document and the IDP.	Council is currently preparing a Physical Activity and Healthy Lifestyles Strategy that will provide the necessary evidence base to plan for playing pitches and indoor sports facilities in the borough.
5	Church Commissioners for England (CCE)	It is important that CCE and TfL work together to identify an acceptable Catford Gyratory improvement scheme that can then be costed, and its funding source identified as TfL, LB Lewisham, and/or CIL. This will ensure that there is a clear link	Noted.

5	Church Commissioners for England (CCE)	between the evidence base and any future transport policy related to the gyratory, and provide landowners and future developers with certainty over costs.	
6	Thames Tideway Tunnel	Minor amendments proposed to update errors in the descriptions of works proposed for the Thames Tideway Tunnel.	Amendments noted, descriptions will be updated in future draft IDP.
7	London Fire & Emergency Planning Authority (LFEPA)	The following text changes were requested (in red): <i>“6.134 <del>The adoption of the Plan</del> <del>The Plan resulted in the closure of Downham Fire Station in 2013</del> led to the closure of this borough’s fire stations (Downham Fire Station) on 9<sup>th</sup> January 2014”.</i>	Amendments noted, descriptions will be updated in future draft IDP.
		Minor amended requested to the name of the consultancy responding on behalf of LFEPA.	Amendments noted, will be updated in future draft IDP.

### Representations received on Local Plan Sustainability Appraisal – Scoping Report

6.4. The Scoping Report was placed on Council’s website, along with the draft Local Plan and Infrastructure Delivery Plan – Framework Document, for the duration of the consultation period.

6.5. To guide consultation responses, the Scoping Report asked four questions for respondents to answer:

- **Question 1:** Have the relevant plans, policies and programmes been considered? Should any further plans, policies or programmes be included?
- **Question 2:** Does the baseline information reflect the current situation in the London Borough of Lewisham? Is there additional social, environmental or economic data which should be considered?
- **Question 3:** Do the issues identified in this report cover all the sustainability matters relevant to the Lewisham Local Plan?
- **Question 4:** Are the sustainability objectives, indicators and targets suitable? Should additional objectives, indicators or targets be included?

6.6. Four (4) responses were received during the consultation period from government agencies. Due to the technical nature of these representations, the issues raised and Council officer responses are outlined in **Appendix 5**.

The table below provides a summary of the representations received. It also sets out the Council's response to these representations, focusing mainly on how the feedback has been taken into account in the preparation of a draft Sustainability Appraisal of the draft Local Plan: Main Issues and Preferred Approaches document.

## 7 Other stakeholder engagement

7.1. In addition to the Regulation 18 consultation of the Options and Issues Local Plan document, the Council has undertaken a process of constructive, active and on-going engagement with Members, adjoining Councils, developers, community groups and relevant agencies. A summary of these activities is summarised below.

### **Call for sites**

7.2. Council have facilitated two 'Call for Sites' consultations since commencing the Local Plan Review, providing opportunities for individuals and organisations to make suggestions for the future use or development of land within the borough. This process assisted Officers in determining which sites were suitable to be taken forward as draft site allocations in the new draft Local Plan 'Preferred Approach' document. Activities included:

- The first 'Call for Sites' in June 2015, prior to the Regulation 18 public consultation. The purpose of this consultation was to bring forward sites for inclusion in Lewisham Strategic Housing Land Availability Assessment (SHLAA). A total of 22 respondents in relation to 46 sites.
- The Council participated in the London-wide SHLAA in 2016/17. The purpose of this consultation was to assist the GLA in the preparation of its technical evidence base to inform the new London Plan. As part of this process, the Council considered 369 sites, some of which were put forward through the GLA call for sites process. A total of 23 respondents from landowners and interested parties submitted responses to the GLA for 51 sites. A number of these sites have been included as proposed site allocations in the new draft Local Plan.
- A second 'Call for Sites' consultation, which ran from 19 September 2018 to 1 November 2018. A total of 27 respondents were received relating to 39 sites. A consultation webpage was set up to facilitate online feedback, which can be found at Appendix 5. A copy of the Guidance and response form can be found at Appendix 6.

7.3. Through the call for sites and SHLAA process, a total of 375 sites have been considered. 79 sites, equivalent to 21% of sites considered, have been included in the draft Local Plan 'Preferred Approach' document.

## **Landowner engagement**

7.4. Landowner engagement took the form of:

- In 2019, Council mailed out a Lewisham Site Survey to land owners who were identified through a land registry search as being within a proposed site allocation. Land owners were asked a series of questions, including their aspirations and proposals for the identified site(s). 71 individual landowners were consulted on 31 sites, as some sites had multiple ownership, with responses received on 11 sites. Additional correspondence also took place via letter, telephone and email. A copy of the notification and survey can be found at **Appendix 7**.

## **Public consultation of technical evidence bases**

7.5. Following the conclusion of the Issues and Options consultation in 2015, the Council has prepared work on a series of additional technical studies leading up to the Preferred Approach document. Key studies informing the spatial strategy were subject to public consultation, with the feedback received informing the consideration of strategic options and the development of the draft Local Plan 'Preferred Approach' document. These consultations included:

- Catford Town Centre Master Plan – 2017;
- New Cross Gate Area Framework and Station Opportunity Study 2018;
- Lewisham Characterisation Study – 2019;
- Surrey Canal Triangle Supplementary Planning Document – 2019/20; and
- New Cross Gate Supplementary Planning Document – 2019/20.

## **All Member briefings and workshops**

7.6. In order to ensure that Members have been engaged throughout the plan process and have had the opportunity to influence its direction, the Strategic Planning Team has facilitated a series of All Members Briefings. To-date, 5 sessions have been held - two held in July 2018, one in October 2018, one in July 2019 and the most recent in February 2020.

7.7. The first session (July 2018) focused on the plan making process and some of the key challenges and opportunities arising through the plan review. The second session (July 2018) set out the 'direction of travel' on the new

plan and potential broad strategic options for the spatial strategy. The third session (Oct 2018) agreed the 'strategic objectives' for the new Local Plan with members and outlined the emerging spatial strategy for the borough. The 'strategic objectives' will frame the strategy and detailed policies for the plan, and will ultimately help to ensure that the plan helps give effect to the new corporate strategy. At the fourth session on (July 2019) officers presented an overview of the draft development management policies and the draft site portfolio. A package of Local Plan documents covering the above was circulated to all members before and after the session in July 2019 for comments. At the fifth session, Members were provided with an opportunity to provide additional comments on the strategic priorities and emerging policies for the Borough's five character areas.

- 7.8. Officers expect to continue engaging with Members throughout the course of the Local Plan's production, both through briefings and more formally through the Key Decision process

#### **Duty to co-operate meetings**

- 7.9. Council officers have continued to run quarterly meetings with South East London local authorities to provide a forum to discuss planning issues affecting the sub-region. Detailed information will be provided in a future Duty to Cooperate Statement for the Regulation 19 consultation.

# Appendix 1: Statutory and general consultees

## **Statutory Consultees**

- Civil Aviation Authority
- Department for Communities & Local Government
- Department for Education
- Department for Environment, Food & Rural Affairs
- Department for Transport
- English Heritage
- Environment Agency
- Greater London Authority (The Mayor of London)
- Highways England
- Historic England
- Lewisham NHS Clinical Commissioning Group
- London Borough of Bromley
- London Borough of Bexley
- London Borough of Lambeth
- London Borough of Southwark
- London Borough of Tower Hamlets
- London Buses
- Metropolitan Police Service
- Mobile Operators Association
- National Grid
- Natural England
- Network Rail
- NHS Property Services
- Office of Rail Regulation
- Royal Borough of Greenwich
- Thames Water
- Transport for London
- Woodland Trust

## **General Consultees**

- Amenity societies
- Housing associations
- Health trusts and emergency services
- Local police services
- Resident associations
- Local ward assemblies
- Other borough-wide groups and developers
- South Eastern Trains
- Southern Rail
- Bodies representing 'hard-to-reach' sections of the Lewisham community, including: children and young people; older people; minority ethnic people; faith/religion; gender groups; LGBT groups
- All people who advised Council that they are interested in being informed about the preparation of the Local Plan



## Appendix 2: Notification letters



Name  
Address  
Postcode

Planning Policy Group  
Planning Service  
3<sup>rd</sup> Floor Laurence House  
1 Catford Road  
London SE6 4RU

Telephone 020 8314 7400  
[planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk)

date 09/10/15  
our reference 01/Local Plan/Reg 18  
Consultation  
your reference

Dear Sir or Madam

### Lewisham Local Plan – Consultation on Main Issues

The Council is starting to prepare a new Local Plan for Lewisham. The Lewisham Local Plan will be the key planning document for the borough. It will set out the planning strategy for growth, that is, how we will deliver the new homes and the related infrastructure needed over the next 15 years, from 2018-2033. It will identify the areas in the borough where growth is expected and how these areas are likely to change in order to accommodate that growth. It will contain the planning policies that will be used to assess planning applications in the future. It will be a single comprehensive Plan that will cover all relevant planning topics for the whole Borough, and will eventually supersede the current suite of Local Plans in the Local Development Framework.

This is a first stage of consultation for the new Local Plan, inviting your views on the major new issues that the Plan needs to address and which are likely to require changes in policy.

This consultation comprises three documents as listed below. These documents are available on the Lewisham web site at:

<http://www.lewisham.gov.uk/myservices/planning/policy/Pages/default.aspx>

or on the Lewisham Consultation Portal at:

[https://lewisham-Consult.objective.co.uk/portal/planning\\_policy](https://lewisham-Consult.objective.co.uk/portal/planning_policy)

Copies of all the documents are also available at the Planning Information Office in Catford Library on the Ground Floor of Laurence House, 1 Catford Road, London SE6 4RU (opening hours Monday to Friday 9am to 1pm), and for reference at all libraries in the borough. Library opening hours are on the Lewisham website at:

<http://www.lewisham.gov.uk/myservices/libraries/branches/Pages/default.aspx?t=4>

### Lewisham Local Plan - Consultation on Main Issues

This document summarises the main issues that will need to be considered in the new Plan. It is accompanied by a questionnaire seeking your views on these issues and how the Council should respond. The questionnaire is downloadable from both web addresses, it can be completed on-line within the consultation portal, or alternatively you can e-mail your response to [planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk).

[www.lewisham.gov.uk](http://www.lewisham.gov.uk)

## Lewisham Local Plan – Sustainability Appraisal Scoping Report

All Local Plans must be accompanied by a **Sustainability Appraisal (SA)** (including a Strategic Environmental Assessment (SEA)) which assesses the economic, social and environmental impacts of a Plan, and factors which can mitigate these impacts. The Scoping Report is the first stage in the preparation of the SA which sets out the information that will be used to assess the sustainability of the Plan. The Council welcomes any general comments, but would particularly value your response to the following four questions:-

- 1: Have the relevant plans, policies and programmes been considered? Should any further plans, policies or programmes be included?
- 2: Does the baseline information reflect the current situation in the London Borough of Lewisham? Is there additional social, environmental or economic data which should be considered?
- 3: Do the issues identified in this report cover all the sustainability matters relevant to the Lewisham Local Plan?
- 4: Are the sustainability objectives, indicators and targets suitable? Should additional objectives, indicators or targets be included?

## Lewisham Infrastructure Delivery Plan (IDP) - Framework Document

Infrastructure is the large scale public services, systems and facilities that are necessary to support the social and economic activity of the borough. It includes power and water supplies, public transport, telecommunications, roads, schools and hospitals amongst others.

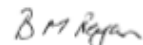
This 'Framework Document' is the first stage in the preparation of the IDP, and establishes the context, scope, format, methodology, governance and delivery arrangements that are to be adopted. The document, when it is completed, will identify what infrastructure is needed to sustainably support the projected growth in population and the increased requirements for new housing and therefore support and inform the policies in the new Lewisham Local Plan.

Please e-mail [planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk) with your views on these documents or post them to Planning Policy at the address given above.

**Please ensure that your responses to these documents are received by the Planning Service by 5pm Friday 20th November 2015.**

If you take part in this consultation, the Council will publish your name and the content of your response, but will not publish any part of your address.

Yours sincerely



**Brian Regan**  
Planning Policy Manager

[www.lewisham.gov.uk](http://www.lewisham.gov.uk)



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[planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk)

date 09/10/15  
our reference 01/Local Plan/Reg 18  
Consultation  
your reference

Dear Sir or Madam

### **Lewisham Local Plan – Sustainability Appraisal Scoping Report**

The London Borough of Lewisham has prepared a scoping report that sets out the proposed methodology for undertaking the sustainability appraisal (SA) (incorporating Strategic Environmental Assessment) of the Catford Town Centre Area Action Plan (AAP).

All Local Plans must be accompanied by a **Sustainability Appraisal (SA)** (including a Strategic Environmental Assessment (SEA)) which assesses the economic, social and environmental impacts of a Plan, and factors which can mitigate these impacts. The Scoping Report is the first stage in the preparation of the SA which sets out the information that will be used to assess the sustainability of the Plan. The Council welcomes any general comments, but would particularly value your response to the following four questions:-

- 1: Have the relevant plans, policies and programmes been considered? Should any further plans, policies or programmes be included?
- 2: Does the baseline information reflect the current situation in the London Borough of Lewisham? Is there additional social, environmental or economic data which should be considered?
- 3: Do the issues identified in this report cover all the sustainability matters relevant to the Lewisham Local Plan?
- 4: Are the sustainability objectives, indicators and targets suitable? Should additional objectives, indicators or targets be included?

The *Sustainability Appraisal Scoping Report* along with *Lewisham Local Plan - Consultation on Main Issues* and *Lewisham Infrastructure Delivery Plan - Framework Document* are available to view and download on Lewisham Council's website at <http://www.lewisham.gov.uk/myservices/planning/policy/Pages/default.aspx>

[www.lewisham.gov.uk](http://www.lewisham.gov.uk)

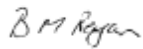
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Please e-mail [planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk) with your views on these documents or post them to Planning Policy, Planning Service, 3<sup>rd</sup> Floor, Laurence House, 1 Catford Road, SE6 4RU.

**Please ensure that your responses to these documents are received by the Planning Service by 5pm Friday 20th November 2015.**

If you take part in this consultation, the Council will publish your name and the content of your response, but will not publish any part of your address.

Yours sincerely



**Brian Regan**  
Planning Policy Manager

[www.lewisham.gov.uk](http://www.lewisham.gov.uk)

# Appendix 3: Consultation Publicity

Council website:

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## A new local plan for Lewisham

We are starting to prepare a new local plan for Lewisham. It will be the key planning document for the borough and will set out how we will deliver the new homes and related infrastructure needed over the next 15 years, from 2018–33.

Give your views by 20  
November

### In this section

- [About the Lewisham Local Plan](#)
- [Lewisham Local Plan – consultation on main issues](#)
- [Sustainability appraisal scoping report](#)
- [Lewisham infrastructure delivery plan](#)

### Contact


#### Planning General Enquiries

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### Planning

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- Planning policy
  - Local Development Framework
- A new local plan for Lewisham**
  - Lewisham Local Plan – consultation on main issues
  - Sustainability appraisal scoping report
  - Lewisham infrastructure delivery plan (IDP) – framework document
  - About the Lewisham Local Plan
- Building control
- Conservation and urban design
- Land charges
- Unauthorised development
- Agents forum

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 Give your views by 20 November


### In this section


- About the Lewisham Local Plan
- Lewisham Local Plan – consultation on main issues
- Sustainability appraisal scoping report
- Lewisham infrastructure delivery plan

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**Public Notice:**



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

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

**Lewisham Local Plan – Consultation on Main Issues  
Scoping Report for the Sustainability Appraisal  
Infrastructure Delivery Plan Framework Document**

This is the first stage of consultation on a new Local Plan  
for Lewisham which will eventually replace the currently  
adopted Local Plans in the Local Development  
Framework.

All documents will be available for inspection and  
comment at the following locations and times, free of  
charge, from **9th October 2015 until 20th November  
2015:**

- On line at <http://lewisham-consult.objective.co.uk/portal>
- Planning Information Office in Catford Library  
Ground Floor, Laurence House, 1 Catford Road,  
London, SE6 4RU. (Opening hours Monday to  
Friday 9am to 1pm).
- All Public and Community Libraries  
Blackheath Village, Catford, Crofton Park, Deptford  
Lounge, Downham, Forest Hill, Grove Park,  
Lewisham, Manor House, New Cross, Pepys,  
Sydenham, and Torridon Road (during opening hours  
– visit [www.lewisham.gov.uk/libraries](http://www.lewisham.gov.uk/libraries) or telephone  
020 8314 6399 for details).

Representations must be in writing (including  
electronically) and will need to arrive at the addresses  
specified within the period

9th October 2015 until 5pm 20th November 2015.  
Representations may be made by any method listed  
below:-

- Online at Lewisham Council's consultation portal:  
<http://lewisham-consult.objective.co.uk/portal> where  
a consultation questionnaire is available to complete
- By e-mail to: [planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk)
- By post to: Planning Service, London Borough of  
Lewisham, 3rd Floor, Laurence House, 1 Catford  
Road, London, SE6 4RU

All consultation comments received will be taken into  
account during the process of preparing the draft Local  
Plan.

For further information please contact the Planning  
Service on 020 8314 7400.

J. MILLER  
Head of Planning,  
Laurence House, 1 Catford Road, SE6 4RU  
9th October 2015

# Appendix 4: Consultation Questionnaire – Outcomes Report



# **Lewisham Local Plan**

## **Regulation 18 Consultation Statement**

**Appendix 4: Consultation Questionnaire – Outcomes Report**

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## Background

This Consultation Questionnaire was prepared to assist members of the community and relevant stakeholders to provide feedback on the “Lewisham Local Plan – Consultation on Main Issues” document that was publically exhibited from Friday 9 October 2015 to Friday 20 November 2015. During the consultation period, the Questionnaire was made available in the following ways:

- Completed online through Council’s Consultation Portal;
- On Council’s main website as a PDF to download and complete; and
- Hard copies distributed to Council’s library network and Planning Information Office, Laurence House.

The purpose of this document is to provide an overview of the questionnaire results, and provide high level summaries of the feedback received.

## Key findings

### Housing

- Respondents were slightly more in favour of developing sites in industrial areas or town centres to in-fill development in existing areas of private housing. However, this was not a strongly held view. A number of respondents were also open to explore ways that existing residential areas could accommodate intensification, provided the scale was proportionate to the existing character of the area.
- Conversation areas, areas near schools, and existing high density areas were identified as not being appropriate for additional housing.
- Supporting self-build projects and making viability reports publicly available were favoured approaches to increase the amount of affordable housing delivered by private housing developers.
- Respondents strongly supported Council retaining or increasing its affordable housing target of 50%, with less than one in five respondents supporting a lower target.

### Employment

- There was strong support for Council continuing its strategy of allowing poorer quality industrial and warehousing land to be redeveloped for housing, as well as co-locating housing and employment uses into new development schemes.
- Respondents were very supportive of Council having a pro-active role in supporting start-up businesses, including by making available low cost space for pop-up stores.
- High speed broadband was considered to be a valued utility that will support businesses in the future.
- Two-thirds of respondents supported the creation of business incubators to support starter businesses.

### Retail and town centres

- Allowing a wider range of entertainment and leisure uses, including short term pop-up stores, was supported to maintain the viability of Major and District Town Centres.
- There was strong support for limiting the number of new betting shops and hot food takeaways in all areas of the borough.

- There was no consensus as to whether Council should have a plan to manage the orderly decline in the number of shops in smaller centres.
- Respondents supported the retention of convenience stores, hairdressers, newsagents, pubs, and independent corner stores with groceries and food in local shopping parades to maintain their local function.
- Approximately one-third of respondents supported Lewisham becoming a Metropolitan Town Centre.

### **Transport**

- Approximately one-third of respondents thought that higher density development should be located only in areas with good public transport, suggesting that a more dispersed strategy could be supported.
- There was support for all new developments being required to prepare travel assessments and travel impact statements to manage traffic impacts.

### **Environment**

- Of the responses received, there was a strong view that the consultation document did not adequately address a range of climate change issues, including higher and unseasonable temperatures, CO2 emissions, and renewable energy and decentralised energy networks.
- There was strong support for protecting all open space from development. The role of open space in promoting healthy lifestyles and leisure opportunities, as well as its role in regulating temperature and rain water drainage were identified by respondents as positive reasons to protect existing open space.

### **Urban design and conservation**

- There were mixed views as to whether Council, in taking a varied approach to achieving high quality design based on the existing character of an area, was working in practice.
- There was support for Council creating policies to protect the special characteristics of residential areas that were not located in Conservation Areas.

### **Community facilities, education and health**

- Promoting mixed use developments (co-locating housing and schools on one site) and requiring developers to ensure that these facilities are provided to support demand created by additional housing were two strategies viewed favourably by respondents.
- There was near unanimous support for the future Local Plan encouraging the use of community facilities for more than one group to maximise its value to the community.

## Housing

**HQ1.** *The Council must provide more housing over the next fifteen years. The target is for the provision of 25,000 additional dwellings over the period from 2018-2033. Where do you think the borough should accommodate more housing?*

- Sites in industrial or warehousing use
- Redevelopment of Council housing estates at a higher density
- Sites in town centres
- Redevelopment of areas of private housing
- Other (**Q2.** *Where other, please tell us your ideas below*)
- No opinion

This question provided the respondent with six (6) options that could be preferred, or ticked to indicate their support. For responses where the options provided were numbered in order of preference, these responses were distributed using the optional preferential countback method.

A total of 29 responses were received.

### Outcome

1 <sup>st</sup> preference	Sites in industrial or warehousing use
2 <sup>nd</sup> preference	Sites in town centres
3 <sup>rd</sup> preference	Redevelopment of Council housing estates at a higher density
4 <sup>th</sup> preference	Other
5 <sup>th</sup> preference	Redevelopment of areas of private housing
6 <sup>th</sup> preference	No opinion

**HQ2.** *If you answered 'Other' to Question 1 please tell us your ideas below.*

A total of 11 responses were received, with ideas including:

- Take a more relaxed approach to where new housing is located throughout the borough, with limited exceptions (e.g. near betting shops, fast food outlets)
- Increase density in all existing housing areas, both public and private
- Encourage small-scale development on existing properties with large gardens
- Develop on public open space within housing estates
- Encouraging occupation of empty and boarded up homes
- More low density housing instead of flats
- Limited low-scale redevelopment of Council housing estates
- Redevelopment in town centres should improve public domain and encourage further investment
- Focus on infill development

**HQ3.** *Do you think there are places in the borough where additional housing should not be built? If you agree then please list these areas below and state your reasons.*

A total of 19 responses were received, with 12 specifically identifying existing open spaces, playing fields, parks, allotments and common land as not suitable for additional housing. Other areas identified included:

- Conservation areas;
- Near schools;
- Existing high density areas;
- Areas of high-medium flood risk;
- Around Lewisham Station; and
- Industrial sites that have the potential for continued use.

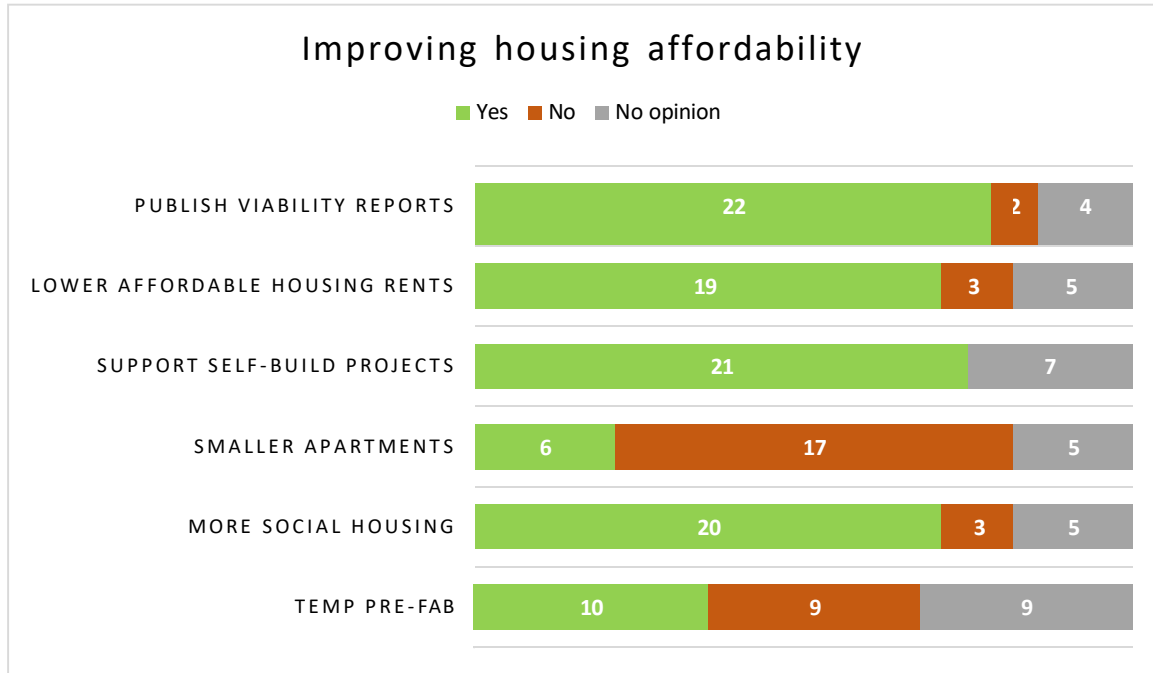
A number of responses also raised concerns about the quality of architectural design of new development, as well as perceptions of poor quality building standards.

**HQ4.** What can the Council do to enable housing to be more affordable, and to increase the amount of affordable housing provided by developers of private housing?

Respondents were asked to select one answer for each of the following options.

**Outcome**

A total of 28 responses were received.



The survey found that strong support for many of the measures, with supporting self-build housing projects and publishing viability reports gaining more than 75% support among respondents. Delivering new housing with lower internal space standards received the least support, with only 21% of respondents supporting this strategy.

**HQ5.** *If you answered 'Other suggestion' to HQ4, please let us have your ideas as to how social housing could be made more affordable.*

A total of 11 responses were received, with a range of ideas provided, including:

- Investigating the potential of **creating a land/property trust** to develop new social housing, similar to earlier Garden City Corporation models;
- **Build properties to lower specifications**, such as one bathroom rather than multiple en-suites, and no parking provision;
- Require developers to provide the majority of any new development as social or affordable housing for local residents;
- Council funded **housing co-operatives**;
- Deliver **new infill development on existing housing estates**; and
- Undertake compulsory purchases of privately owned units in housing estates to facilitate redevelopment for additional housing.

In a number of the responses received, concerns were raised around perceptions that social and affordable housing was not being built to the same standard as market housing in new developments, and did not provide sufficient storage space and living areas.

Other responses highlighted concerns that social and affordable housing is already too concentrated in some areas, and so should not be increased further.

One response raised concerns about how social and affordable houses were managed, with the perception that private investors would not take an active role in managing the property, resulting in the potential for tenants to not respect the property and/or other tenants and neighbours.



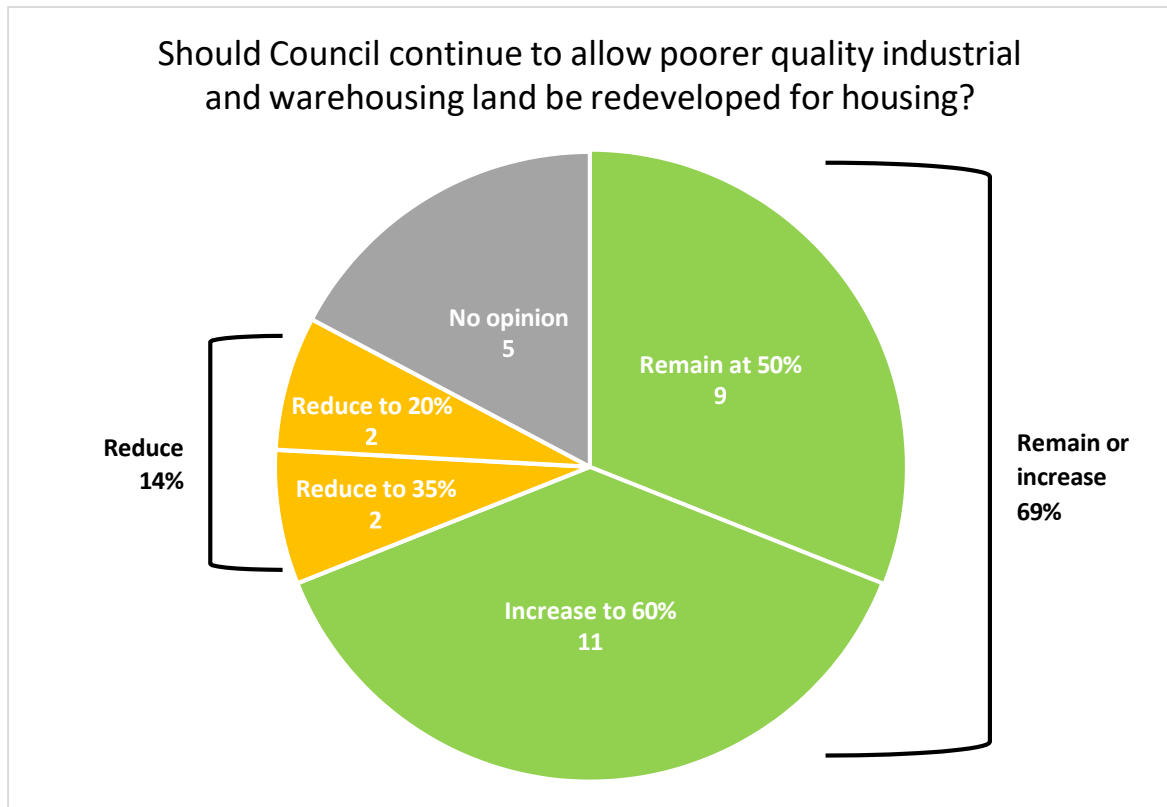
**HQ6.** *The Council negotiates with the developers of new housing and currently seeks that 50% of any provision as affordable housing. Do you think this should change?*

Respondents were asked to select one answer for each of the following options:

- Remain at 50%
- Increase to 60%
- Reduce to 35%
- Reduce to 20%
- No opinion

**Outcome**

A total of 29 responses were received.



69% of respondents were in favour of either maintaining the existing 50% affordable housing provision, or increasing to 60%, while 14% supported reducing current provision. 17% of respondents did not have an opinion.

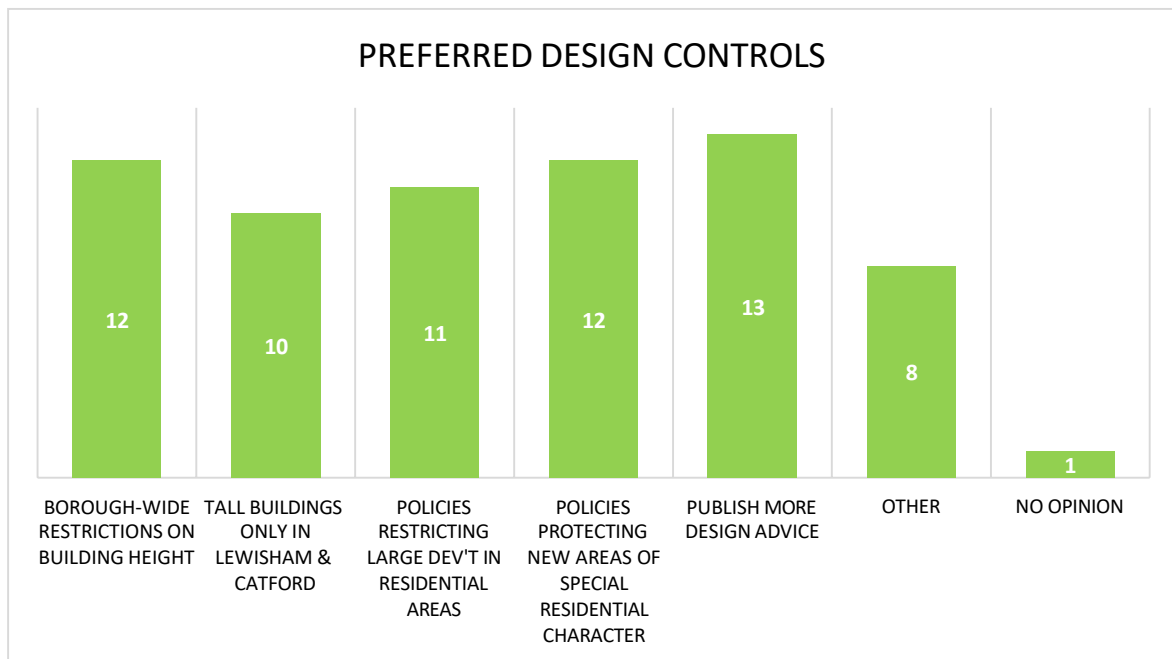
**HQ7. What design controls are needed to avoid any adverse impact on new housing on existing housing and on overall townscape quality?**

Respondents were asked to indicate support for any of the following options:

- Borough-wide restrictions on the height of buildings
- Allowing tall buildings only in Lewisham and Catford Town Centres and major development sites identified as suitable
- Introducing policies to restrict large developments in residential areas
- Policies protecting new Areas of Special Residential Character (Conservation Areas are already protected)
- Publish more design advice
- Other
- No opinion

**Outcome**

A total of 27 respondents provided an answer to the question.



The survey found that there was broad support for all of the options put forward.

**HQ8.** *If you answered 'Other' to HQ7 please give you suggestions below.*

Of the eight (8) respondents who indicated they preferred “other” design controls to the options provided in **HQ8**, six (6) responses were provided. In summary, the suggestions provided included:

- Not limiting high rise development to any particular location in the borough, but rather focus on high quality design as a way to avoid adverse impacts;
- Taking a more rigorous approach to ensuring building heights reflect the character of the surrounding area;
- Developing a policy that promotes as well as supports new Areas of Special Residential Character;
- Ensuring social housing is built to support social cohesion, and is of a high built form standard;
- Ensuring new developments are sufficiently set back from the street to allow for greater provision for pedestrians and cyclists; and
- Taking a less prescriptive approach to planning assessment to encourage creativity and investment opportunities.

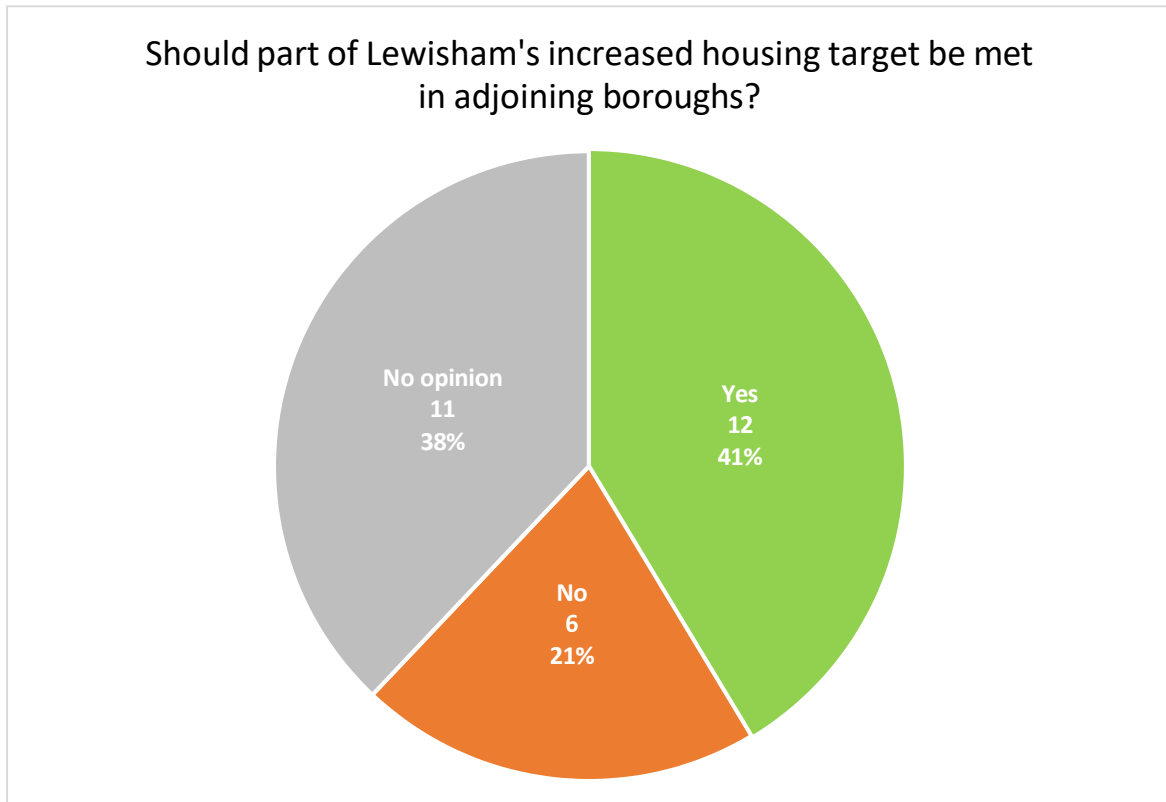
**HQ9.** *Should part of the increased housing target be met in adjoining boroughs?*

Respondents were asked to indicate support for the following options:

- Yes
- No
- No opinion

**Outcome**

A total of 29 responses were received.



The question found that there were mixed views as to whether adjoining local boroughs should assist Lewisham in achieving its housing target, with a high proportion (38%) of respondents having no opinion. A similar number (41%) of respondents agreed that adjoining authorities should support Lewisham, while only 21% disagreed with the statement.

## Employment

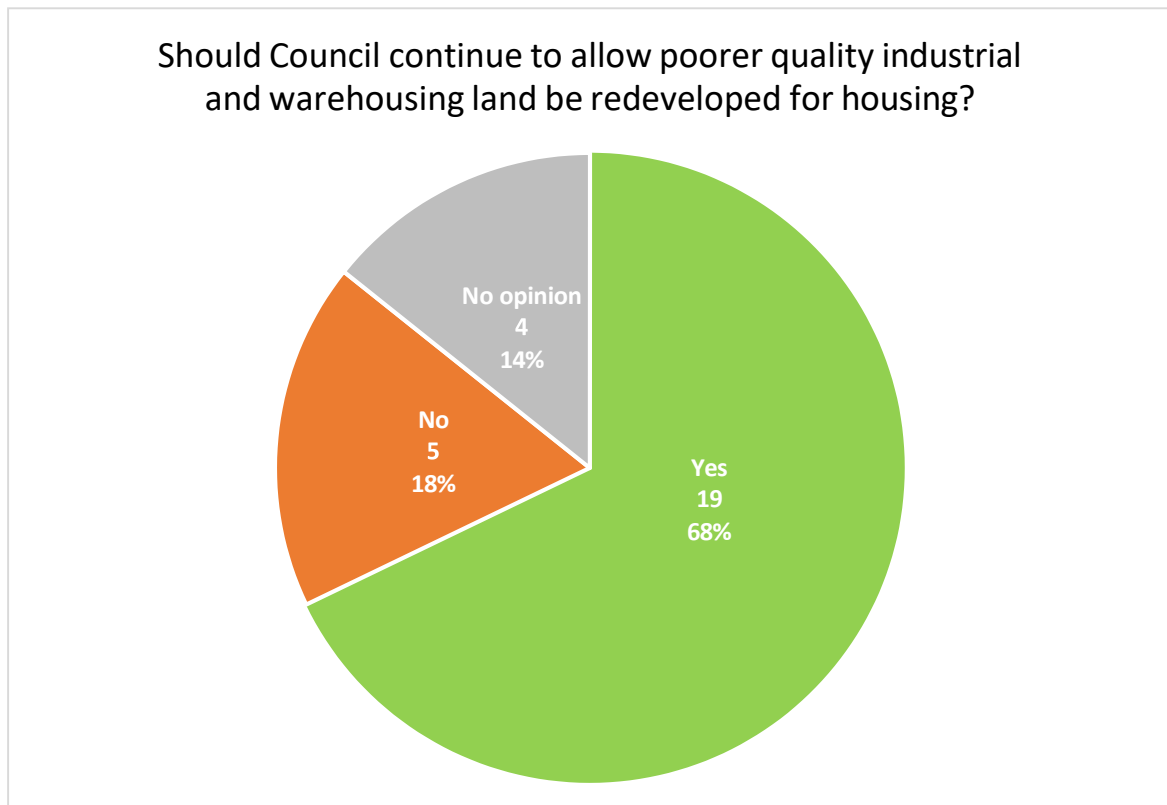
**EQ1.** Do you think that the Council should continue with the current strategy of gradually allowing poorer quality surplus industrial and warehousing land to be redeveloped for housing?

Respondents were asked to indicate support for the following options:

- Yes
- No
- No opinion

### Outcome

A total of 28 responses were received.



The question found that there was strong support among respondents to redeveloping poor quality surplus industrial land for housing, with 68% of respondents agreeing with the statement.

**EQ2.** *The borough has a number of small scattered sites such as garages, builders yards, small workshops. When the owners of these sites propose to redevelop them for housing, how should the Council react?*

Respondents were asked to allocate preferences against the following options:

- Allow the residential development to be built
- Retain the site in business use if it continues to provide local services
- Seek a mixed use with part business and part housing
- No opinion

A total of 28 responses were received.

**Outcome**

- |                            |   |
|----------------------------|---|
| 1 <sup>st</sup> preference | Seek a mixed use development                    |
| 2 <sup>nd</sup> preference | Retain the site in business use if still viable |
| 3 <sup>rd</sup> preference | Allow the residential development to be built   |
| 4 <sup>th</sup> preference | No opinion                                      |

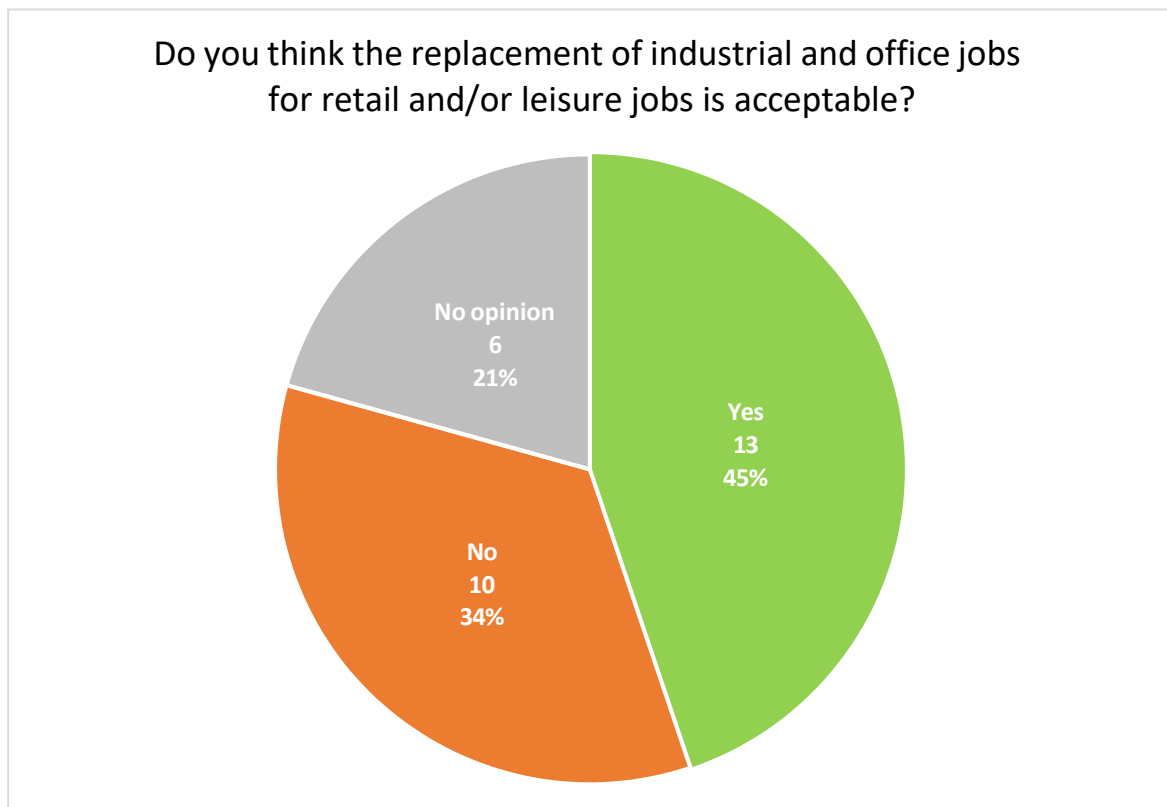
**EQ3.** Do you think that the replacement of industrial and office jobs by retail and/or leisure jobs is acceptable?

Respondents were asked to indicate support for one of the following options:

- Yes
- No
- No opinion

**Outcome**

A total of 29 responses were received.



The question found that there was no consensus amongst respondents to the question, with one in five respondents having no opinion.

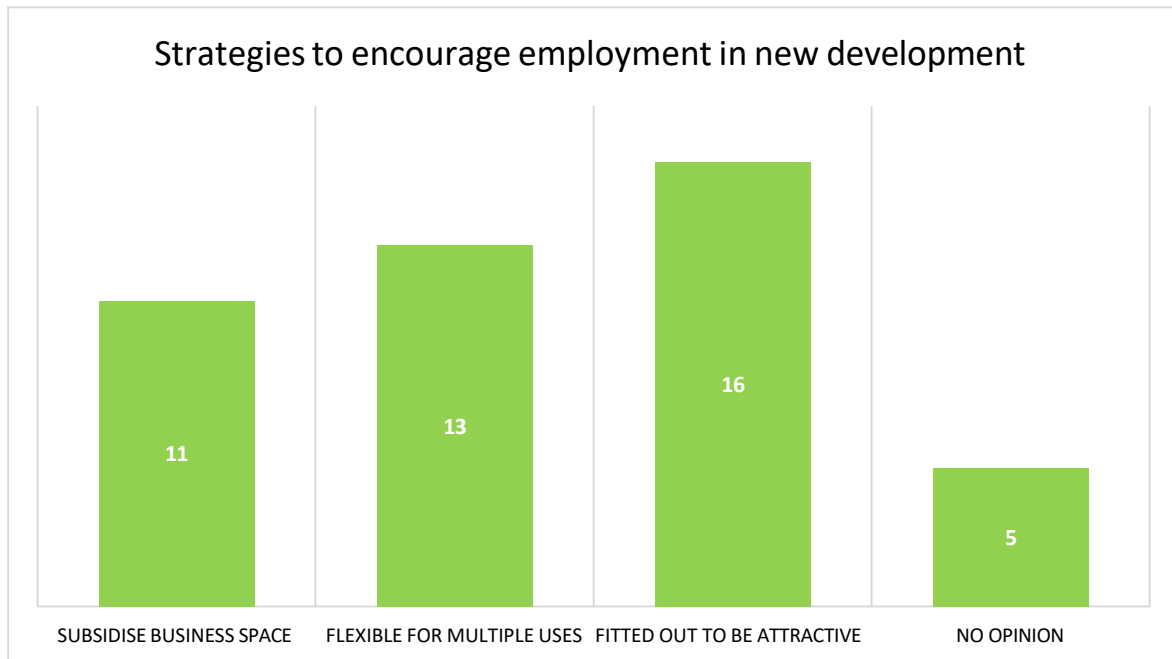
**EQ4.** What actions should the Council take to ensure that new large mixed use developments, like those in the Deptford / New Cross Area, succeed in offering a variety of new jobs?

Respondents were asked to indicate support for any of the following options:

- Provide subsidised business space
- Make sure that the units are flexible and can be used by a variety of businesses
- Ensure that business units are designed and fitted out to be attractive to new businesses
- No opinion

**Outcome**

A total of 27 respondents provided an answer to the question.



The question found that there was broad support for all of the policy options put forward.



**EQ5.** *Do you have any further suggestions as to how to ensure these mixed use developments are attractive to new businesses?*

A total of 8 responses were received, with a range of ideas provided, including:

- With the exception of businesses that have a damaging effect on people's health (betting shops, fast food outlets), Council should **focus on reducing burdens on business**. This includes reducing business rates, planning restrictions, and other red tape;
- **Conduct a business survey** to better understand what type / size of floor space is needed;
- Provide more **support for start-up businesses**;
- Allow more pop-up stores, and assist businesses that are successful by offering cheaper rents for long term leases;
- Re-use of industrial sites should be considered on a case by case basis;
- Ensure developments have **high quality public spaces where workers can chill out** in their break times;
- Ensure developments **provide high speed broadband** and transport connectivity;
- Council should **subsidise office space**.

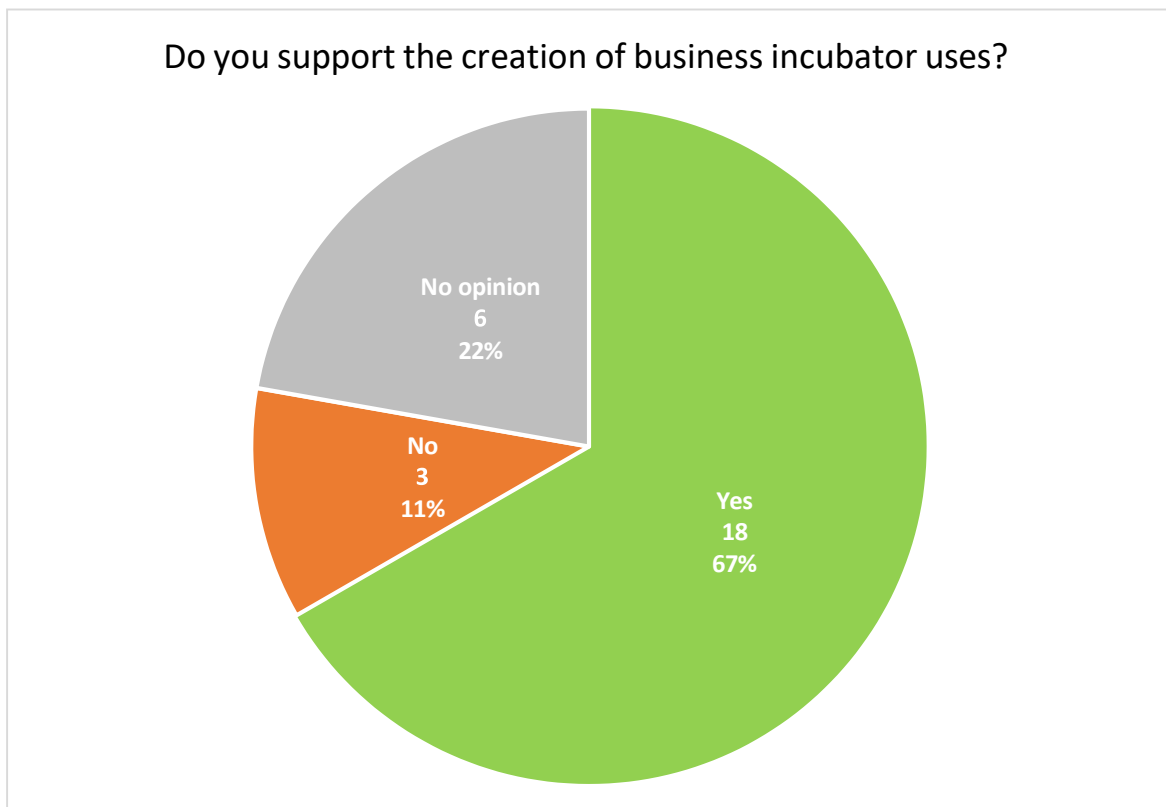
**EQ6.** Do you support the creation of business incubator uses which are premises provided at low rents, and flexible terms, to support starter businesses?

Respondents were asked to indicate support for one of the following options:

- Yes
- No
- No opinion

**Outcome**

A total of 27 responses were received.



The question found that there was strong support for creating business incubator uses, which 67% of respondents supporting the strategy.

**EQ7.** *How do you think the Council should continue to support creative industries which often rely on premises with cheaper rents which are vulnerable to rising residential land values?*

A total of 16 responses were received, with a range of ideas provided, including:

- Council owned commercial floor space should be sold to fund library services;
- Offer reduced business rates to private landowners to encourage affordable long term leases and start up networking events;
- Have a dedicated council officer supporting the creative industry sector;
- Provide reduced business rates to vacant retail shop fronts;
- Ring fence some facilities and promote community uses (for meetings, cinema);
- Promote local creative industries on local high streets;
- Restrict existing creative use buildings from changing their use to other business classes;
- Amend planning policy to encourage live/work development;
- Create a “creative industry” zone that prohibits residential development.

## Retail and town centres

**RQ1.** *The retail sector is facing various challenges, including from the internet and changing shopping habits. What should the Council do in response to maintain the viability of the Major and District Town Centres?*

Respondents were asked to allocate preferences against the following options:

- Allow units at the edge of town centres to change to other uses
- Promote uses in town centres according to their character and particular strengths
- Maintain a core of convenience shops in a centre
- Allow a wider range of entertainment and leisure uses, including short term 'pop-up' lets such as art galleries
- No opinion

A total of 28 responses were received.

### **Outcome**

1 <sup>st</sup> preference	Allow a wider range of entertainment and leisure uses, including short term 'pop-up' lets such as art galleries
2 <sup>nd</sup> preference	Promote uses in town centres according to their character and particular strengths
3 <sup>rd</sup> preference	Maintain a core of shops in a centre
4 <sup>th</sup> preference	Allow units at the edge of town centres to change to other uses
5 <sup>th</sup> preference	No opinion

**RQ2.** *The Council can now limit the number of new betting shops and hot food takeaway shops. Should they be limited in...*

Respondents were asked to indicate support for one of the following options:

- All areas of the borough
- In the larger shopping centres only
- In the smaller parades only
- No opinion

**Outcome**

A total of 28 respondents provided an answer to the question.



There was strong support for limiting the number of new betting shops and hot food takeaway in all areas of the borough.

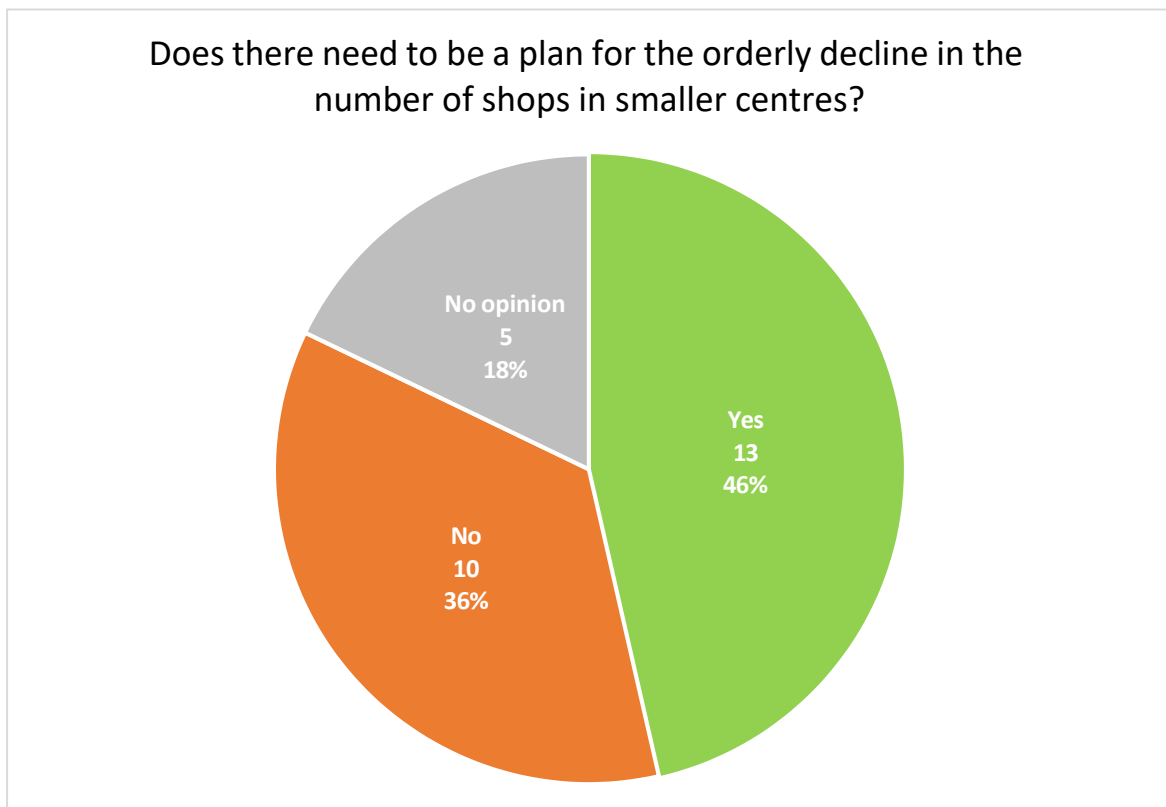
**RQ3.** *In view of the changes to the retail sector, do you think there will be a need to plan for an orderly decline in the number of shops in the smaller centres and local parades?*

Respondents were asked to indicate support for one of the following options:

- Yes
- No
- No opinion

**Outcome**

A total of 28 responses were received.



While there was no majority position in response to the question, 46% of respondents supported the statement that there should be a plan to manage the decline in the number of shops in smaller centres and local parades. The question found that there was no consensus amongst respondents to the question, with one in five respondents having no opinion.

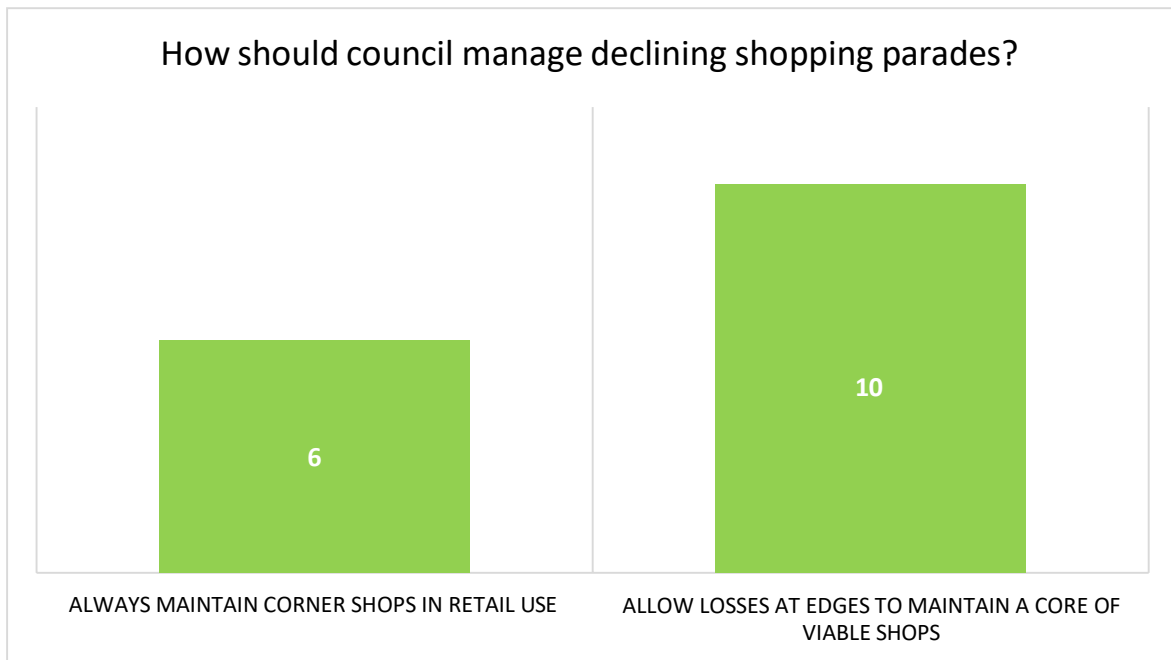
**RQ4.** If your answer to **RQ3** is yes, how should the Council go about this process?

Respondents were asked to indicate support for any of the following options:

- Always maintain corner shops in retail use where there is an under provision
- Allow losses at the edges of shopping parades in order to maintain a core of viable shops

**Outcome**

A total of 12 responses were received.



There was a minor preference toward allowing losses at the edge of local parades to maintain the viability of the core, though it was noted that less than one in three respondents provided an answer to the question.

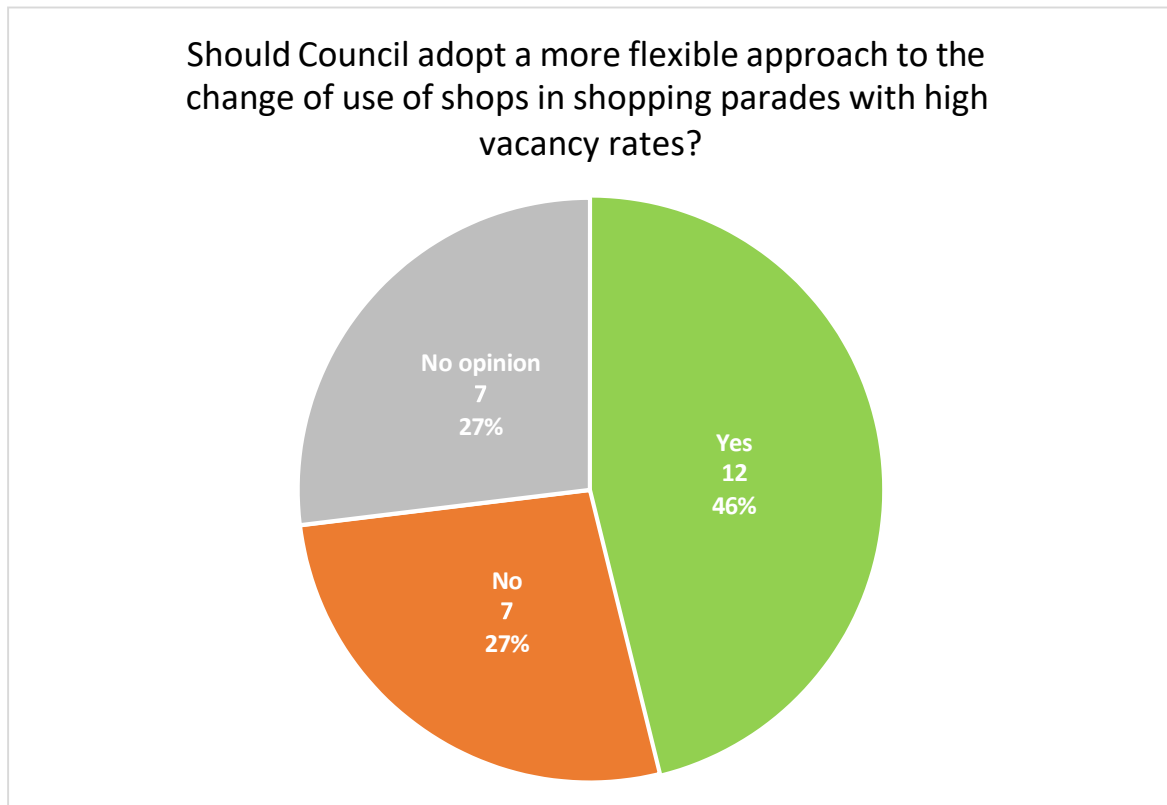
**RQ5.** Do you think that the Council should adopt a more flexible approach to the change of use of A1 shops in town centres and shopping parades with high vacancy rates?

Respondents were asked to indicate support for one of the following options:

- Yes
- No
- No opinion

**Outcome**

A total of 26 responses were received.



There was no majority position, almost half of respondents were in favour of Council taking a more flexible approach to the change of use of shops to address high vacancy rates.



**RQ6.** *Ideally, what sort of uses would you like to see maintained in local shopping parades?*

A total of 15 responses were received, with a range of ideas provided, including:

- Convenience stores
- Hairdressers
- Corner stores with groceries and food
- Small independents including bakeries and newsagents
- Eco-shops
- Social enterprises
- Music and craft stores
- Pubs
- Fuel stations

Other suggestions included:

- Dedicating a shop to support local business rather than franchise
- Allowing pop up shops that can be used as workshops for art and craft
- Providing new daytime community space
- Ensure a variety in businesses by allowing more intensive residential development in local centres with high quality public realm
- Allow change of use to restaurants, capping additional takeaways.

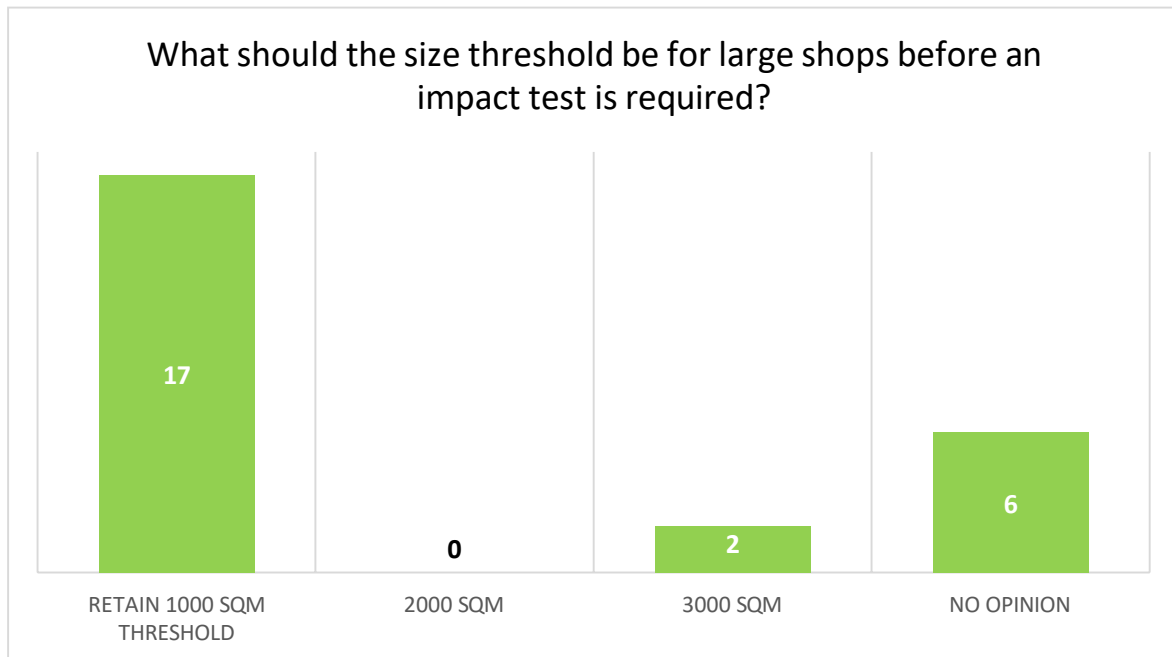
**RQ7.** *In order to protect local shopping centres the Council can set a size threshold whereby large new shops have to provide evidence that they would not have a negative effect on the functioning of the centre. At what size limit should this threshold be set?*

Respondents were provided with examples of typical sizes of supermarkets in the local area to assist with answering the question. Respondents were then asked to indicate support for one of the following options:

- Retain 1,000 sq m threshold
- 2,000 sq m
- 3,000 sq m
- No opinion

**Outcome**

A total of 26 responses were received.



Of the responses received, there was strong support for retaining the existing 1,000sqm threshold.

**RQ8. Should Lewisham Town Centre aspire to become a Metropolitan Town Centre?**

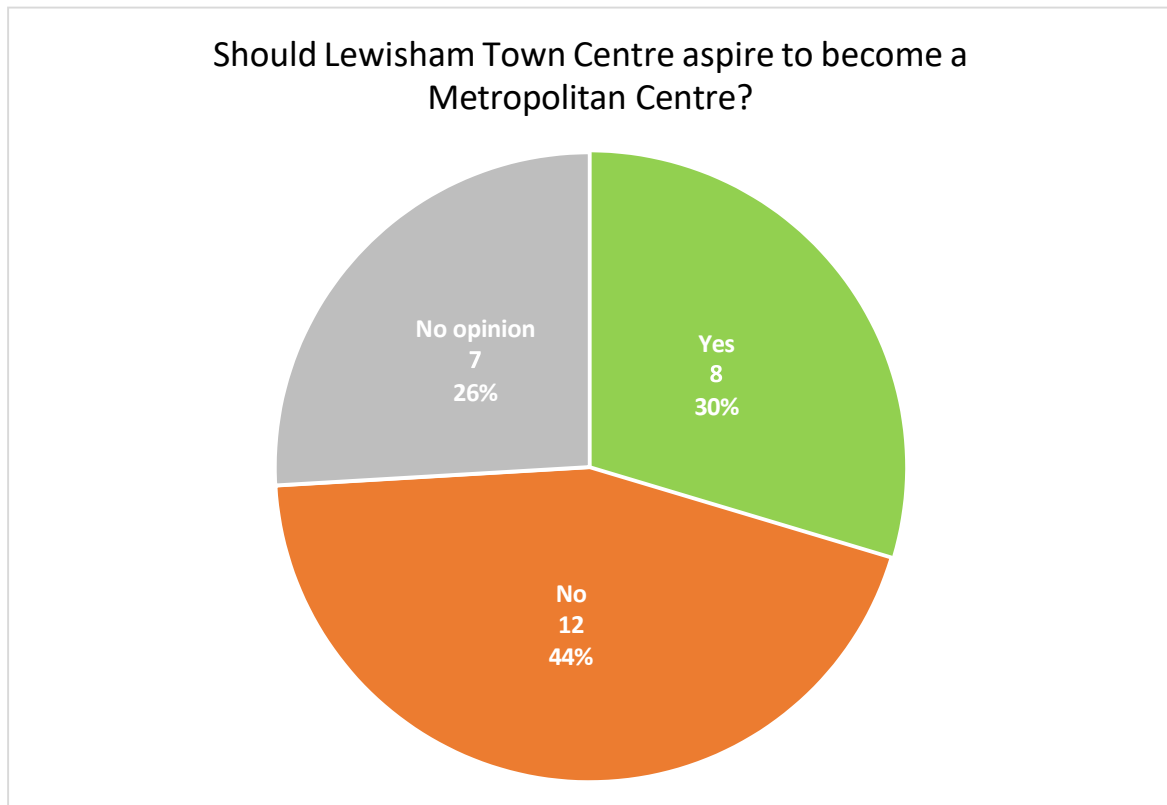
Respondents were provided with a short explanation describing the difference between a Major Centre and a Metropolitan Centre. Lewisham is currently defined as a Major Centre, as it contains between 50,000 – 100,000 sq.m of retail, leisure and service floor space. Metropolitan Centres typically contain at least 100,000 sq.m of floor space, with a greater variety of goods and services.

Respondents were asked to indicate support for one of the following options:

- Yes
- No
- No opinion

**Outcome**

A total of 27 responses were received.



70% of respondents were either not supportive, or had no opinion as to whether Lewisham Town Centre should aspire to become a Metropolitan Centre.

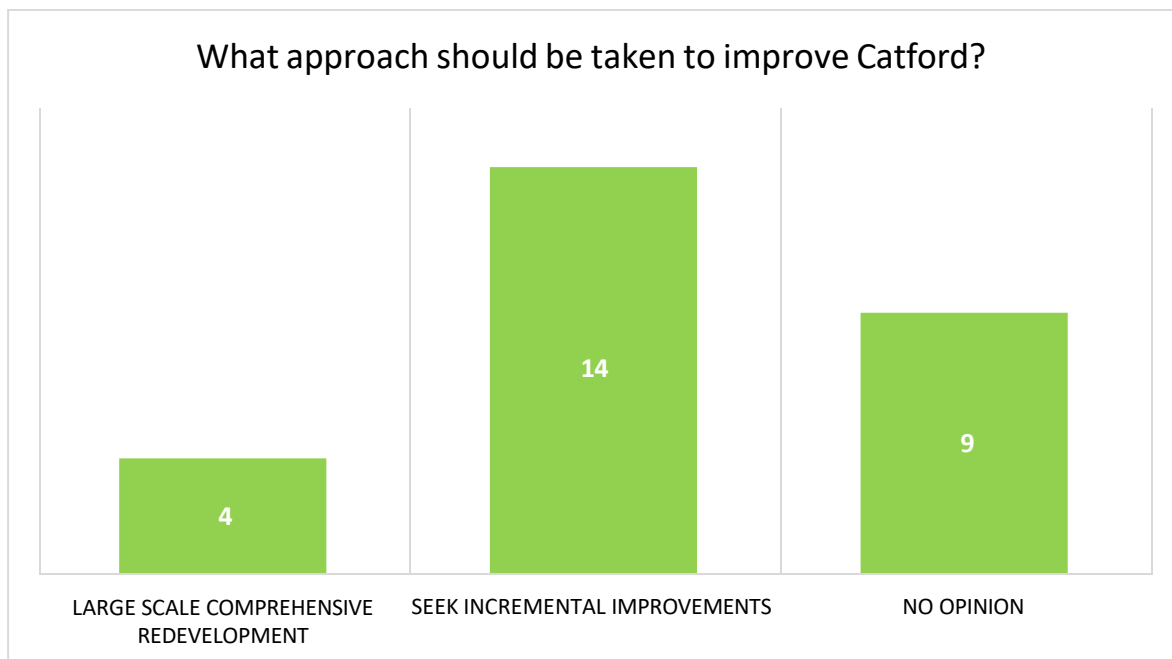
**RQ9.** *The Council intends to improve and redevelop Catford Town Centre. What approach do you think should be taken?*

Respondents were asked to indicate support for one of the following options:

- Large scale comprehensive redevelopment to provide more shops at a modern standard
- Seek incremental improvements as opportunities arise
- No opinion

**Outcome**

A total of 27 responses were received.



The majority of responses received were in favour of Catford Town Centre being incrementally improved as opportunities arose, rather than a large scale comprehensive redevelopment.

## Transport

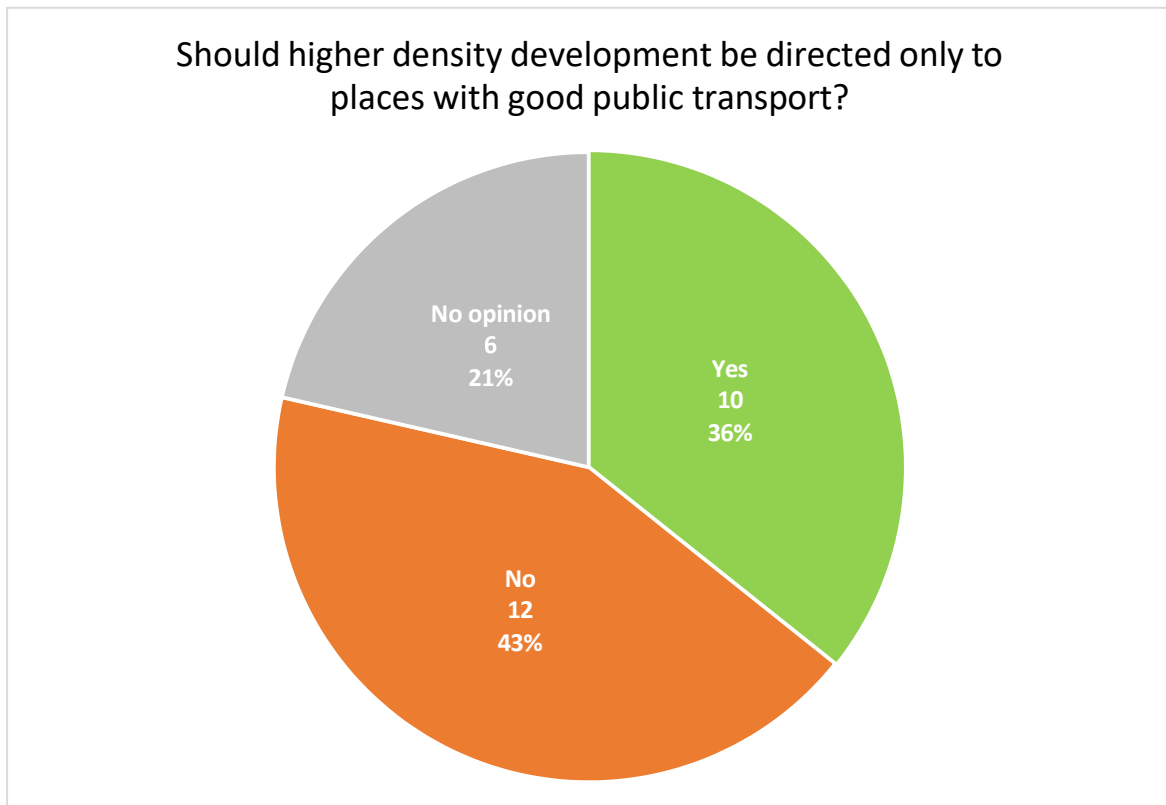
**TQ1.** Do you think that we should direct higher density development to places where good public transport is available, and restrict development in places with poor public transport?

Respondents were asked to indicate support for one of the following options:

- Yes
- No
- No opinion

### Outcome

A total of 28 responses were received.



There were mixed views among respondents as to whether higher density development should only be directed in locations with good public transport.

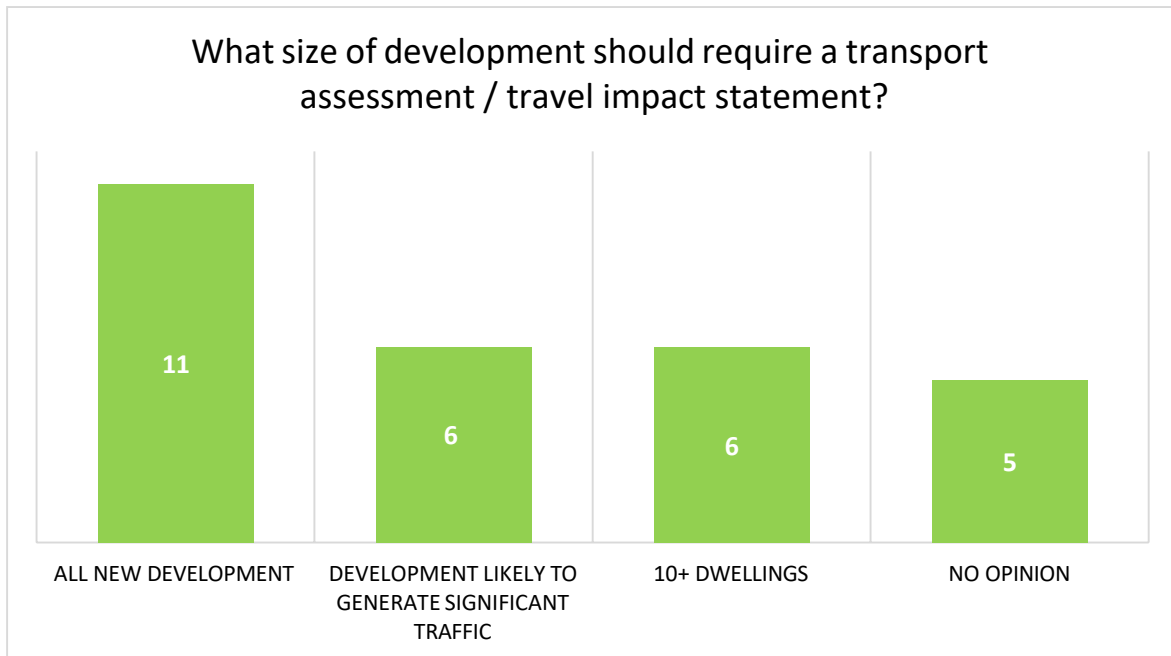
**TQ2.** *Should the Council require transport assessments / travel impact statements for all new developments or only for developments larger than a certain size threshold?*

Respondents were asked to indicate support for one of the following options:

- For all new developments
- For developments that are expected to generate a significant amount of traffic
- For new developments of more than ten dwellings
- No opinion

**Outcome**

A total of 28 responses were received.



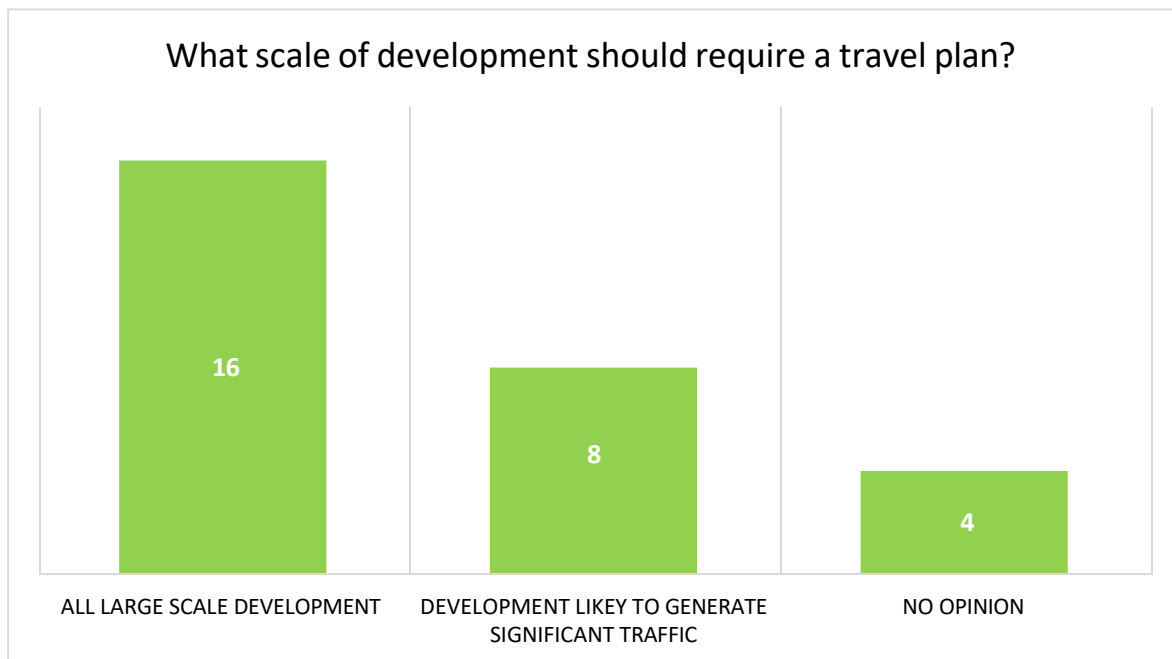
**TQ3.** Should the Council require a Travel Plan to be provided for all large developments or only for those that will generate a 'significant' amount of traffic?

Respondents were asked to indicate support for one of the following options:

- For all large scale developments
- For developments that are expected to generate a significant amount of traffic
- No opinion

**Outcome**

A total of 28 responses were received.



Respondents were broadly in favour of Council requiring Travel plans to be provided for all large scale development.

**TQ4.** *Should the Council adopt car parking standards from the London Plan or adopt local standards?*

Respondents were asked to indicate support for one of the following options:

- Adopt the London Plan car parking standards
- Adopt local car parking standards which restrict parking
- Adopt local standards which allow more car parking
- No opinion

**Outcome**

A total of 27 responses were received.



There was no clear view among respondents to this question, with 10 (37%) of responses having no opinion to the question.



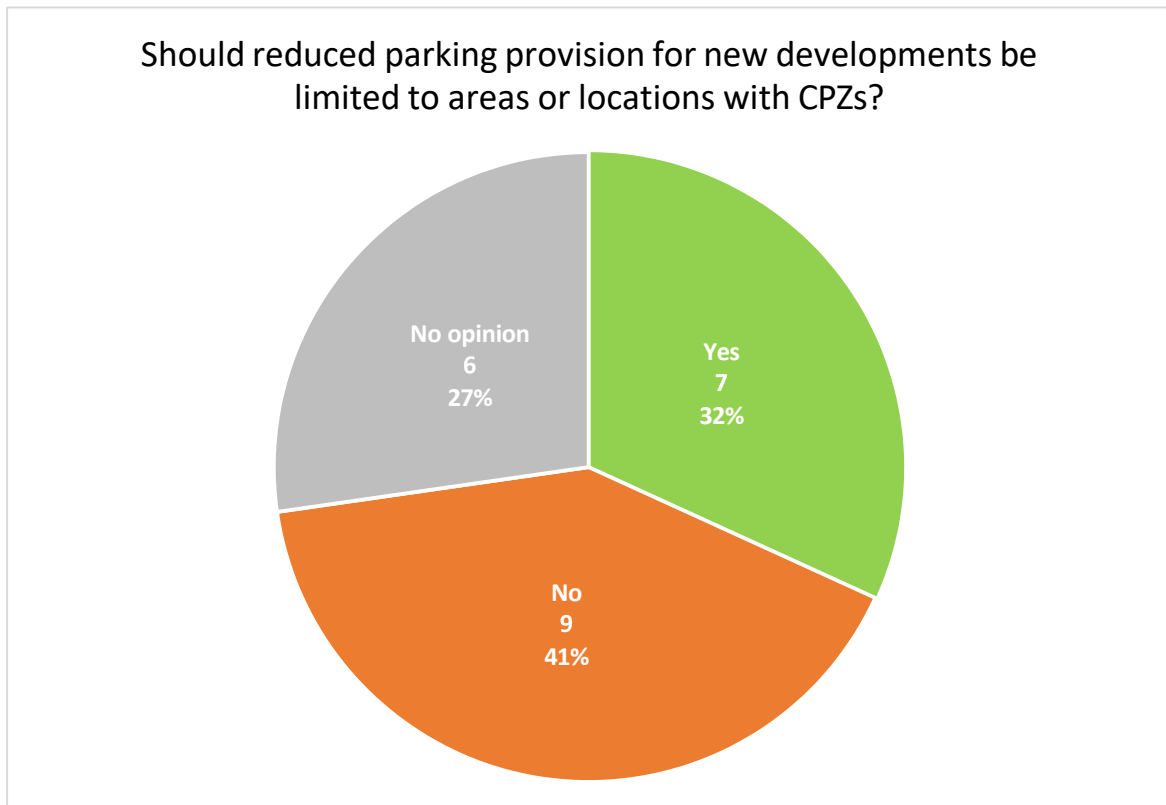
**TQ5.** *Should reduced parking provision for new developments be limited to areas or locations with controlled parking zones?*

Respondents were asked to indicate support for one of the following options:

- Yes
- No
- No opinion

**Outcome**

A total of 22 responses were received.



Less than one in three respondents were in favour of reducing car parking provision for new development in areas with controlled parking zones.

## Environment

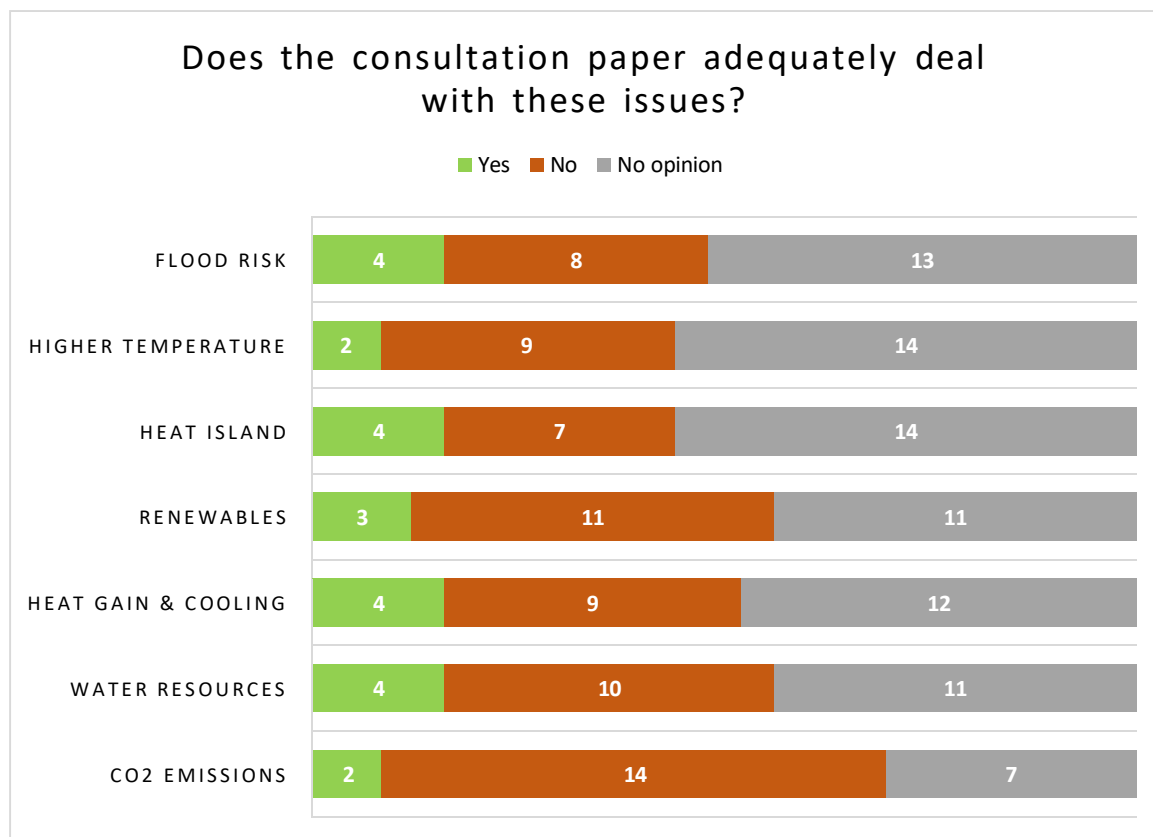
**ENQ1.** Do you think that the consultation paper deals adequately with climate change issues?

Respondents were asked to indicate support for one option of each of the following issues:

- Flood risk
- Higher and unseasonal temperatures
- Urban heat island effect / urban greening
- Renewable energy and decentralised energy networks
- Heat gain and cooling within buildings
- Water resources and efficiency
- CO2 emissions

### Outcome

A total of 25 responses were received.



Less than 20% of responses said that the consultation paper adequately addressed climate change issues.

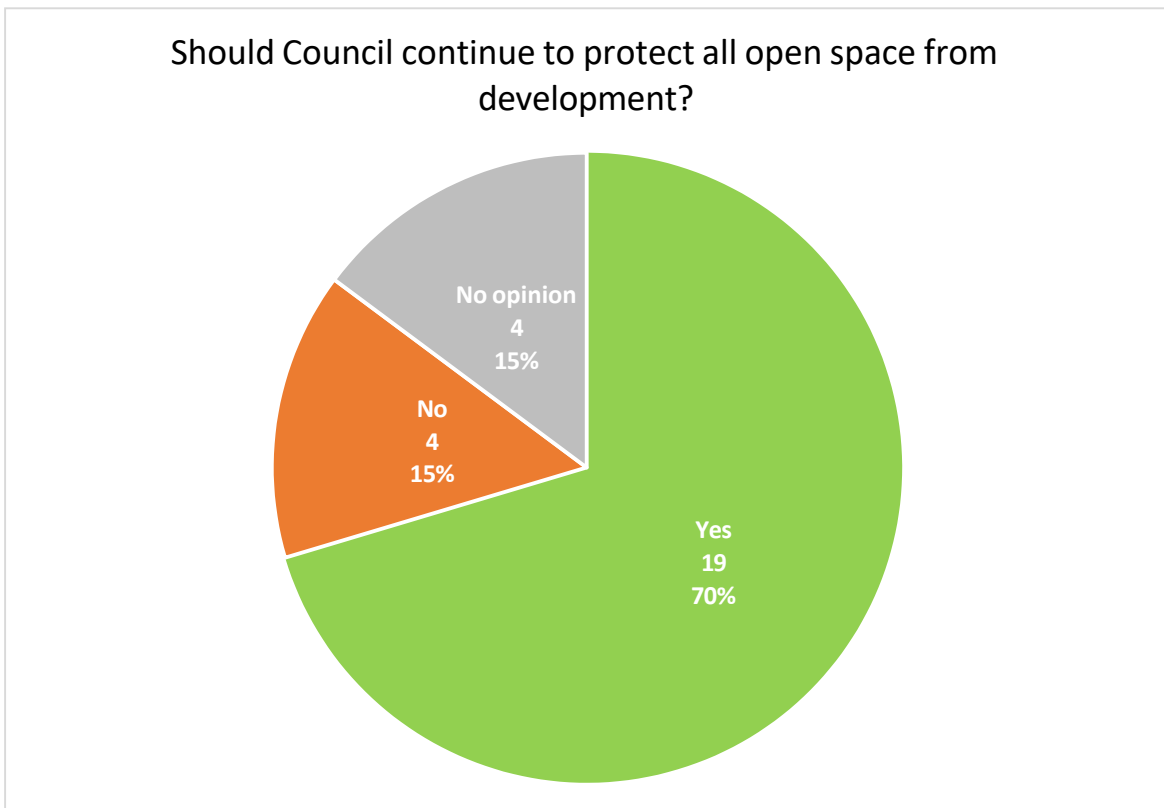
**ENQ2.** *The borough is facing increased pressures from population growth, the need to expand school provision and budget pressures. Should the Council continue to protect all open space in the borough from pressures for development?*

Respondents were asked to indicate support for one of the following options:

- Yes
- No
- No opinion

**Outcome**

A total of 27 responses were received.



There was strong support for Council continuing to protect all open space from development.

**ENQ3.** Please give your reasons for your answer to **EQ2**.

A total of 24 responses were received, with a range of comments provided, including:

In favour of protecting open spaces	In favour of developing open spaces
<ul style="list-style-type: none"> <li>• More need for open space as the population grows</li> <li>• Green spaces are essential for the physical and mental health of a growing population</li> <li>• Green and open spaces improve our quality of life</li> <li>• Vital to the natural environment in the area</li> <li>• Important for health and wellbeing</li> <li>• Open spaces have an important role in climate/temperature regulation and rain water drainage</li> <li>• Open spaces are places to go and relax on the weekend to enjoy nature</li> <li>• Important for children to play in natural area</li> <li>• Green spaces play an important recreation role</li> <li>• Improves air quality</li> </ul>	<ul style="list-style-type: none"> <li>• Underused green spaces should be developed on</li> <li>• Development should be permitted along waterways for river related employment activities</li> <li>• There are a number of parks in Lewisham that are of low environmental quality and have limited public access – these sites should have the flexibility to be redeveloped in the new Local Plan</li> </ul>

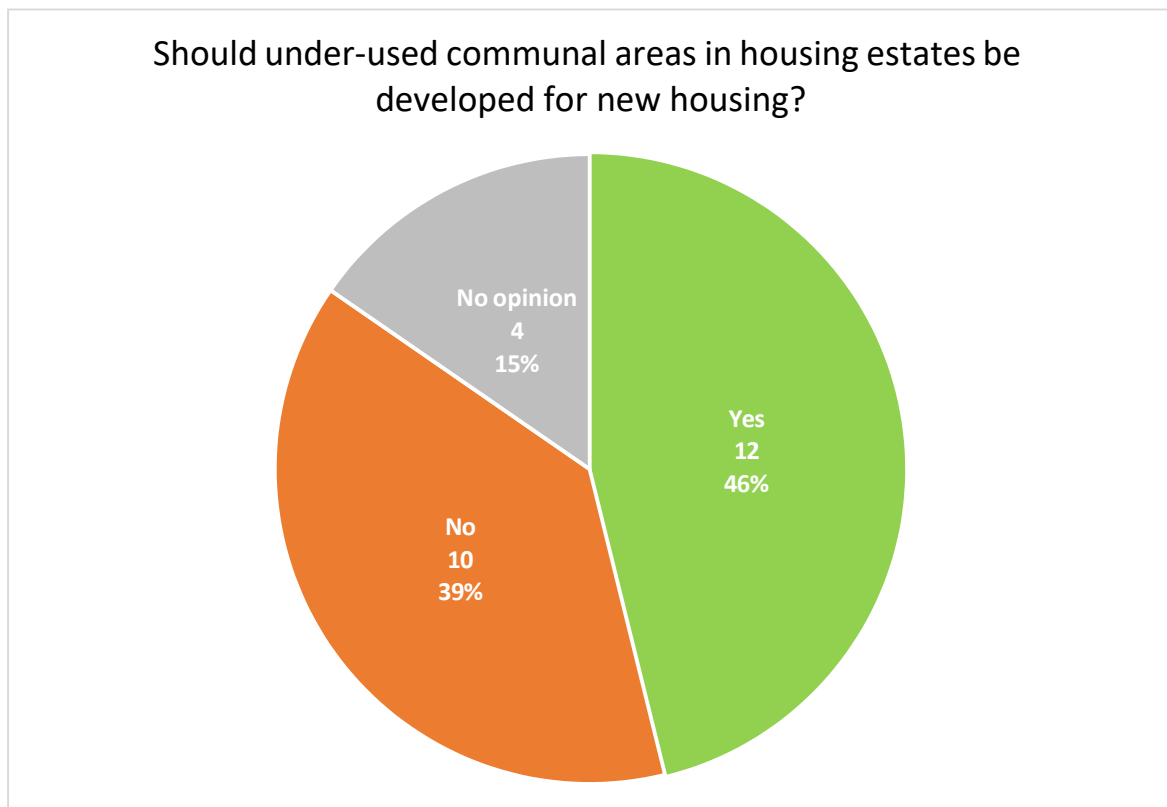
**ENQ4.** *Should under-used communal green areas in housing estates be developed to create new housing, where this can be achieved without harming existing residential amenity?*

Respondents were asked to indicate support for one of the following options:

- Yes
- No
- No opinion

**Outcome**

A total of 26 responses were received.



Support was generally divided amongst respondents as to whether communal areas in housing estates should be developed for new housing.

**ENQ5.** Do you know of any areas of open space that are not currently formally protected in the Local Plan and should be considered for designation?

**Outcome**

A total of 4 responses were received, with the following areas identified:

Site	Council Officer response
Old Tidemill School	The former Tidemill School, known as Land north of Reginald Road and south of Frankham Street has been identified as a site allocation in the new Local Plan. A requirement of redeveloping the site is to create a new landscaped square, framed by new and converted buildings, create a cohesive public realm across the site that develops stronger relationships with Deptford district centre, incorporating a new central north-south route for pedestrians and cyclists. New public realm should be able to accommodate a range of appropriate activities whilst retaining an overall tranquil atmosphere. Consideration should be given to the retention of mature trees, especially those adjacent to the annexe and along the Frankham House boundary. As the site is designated for development, any public realm upgrades or public spaces that are created wouldn't be considered for formal protection.
Cnr. Winn Road & Guibal Road, L	This site was reviewed by officers and at the time and did not meet the threshold for a formal designation through the Local Plan, however this could be brought forward and designated as a Local Green Space in any Neighbourhood Plans that may come forward within the area.
Grove Park Library and adjoining playground	Site is already designated as Metropolitan Open Land (MOL), and will be retained in the next Local Plan.
Leegate Shopping Centre Precinct	<p>The Leegate Shopping Centre Precinct has been identified as a site allocation in the new Local Plan. A requirement of redeveloping the site is to deliver new and improved public realm and open space, in accordance with a site-wide public realm strategy. A new public square is also to be provided set back from Burnt Ash Road, with opportunity for external seating area, landscaping and playspace as well as communal courtyard gardens, private amenity spaces and improved public realm along Eltham Road and Burnt Ash Road.</p> <p>Further, it is expected that the existing large canopy tree planting on the south east corner should be used to improve the pedestrian experience and link the Burnt Ash Road avenue of trees with the mature trees on the site.</p> <p>These public realm upgrades would not constitute open space, and wouldn't be considered for formal protection.</p>

**ENQ6.** *Do you know of any areas of open space that you think should be developed for other uses?*

**Outcome**

A total of 3 responses were received

<b>Site</b>	<b>Council Officer response</b>
Sections of Mountsfield Park	The Local Plan will seek to protect existing open space given future requirements identified in the latest open space study.
Beckenham Place Park	
Bellingham Leisure Centre	

**ENQ7.** *What elements do you think will be important to consider when designing developments that minimise negative impacts from noise and light pollution, waste handling and impacts on quality?*

**Outcome**

A total of 12 responses were received, with a range of ideas provided, including:

- Ensuring highly skilled architects are used, with a fair and just planning approval committee process
- Green roofs and vertical gardens
- More use of solar panels
- Support for car clubs with electric vehicles with charging points
- Prioritise privacy when designing apartment buildings, while ensuring good light access into units
- Effects of climate change and flood risk
- Limiting car parking in new development
- Heat capture systems for heating
- Sound proofing
- Energy conservation through better glass and wall insulation
- Reducing air pollution
- Use of eco-friendly sustainable materials
- Deeper building setbacks to the street
- Promote more low scale “village” development
- Better monitoring of CO2 impact of development during construction and thereafter



## Urban design and conservation

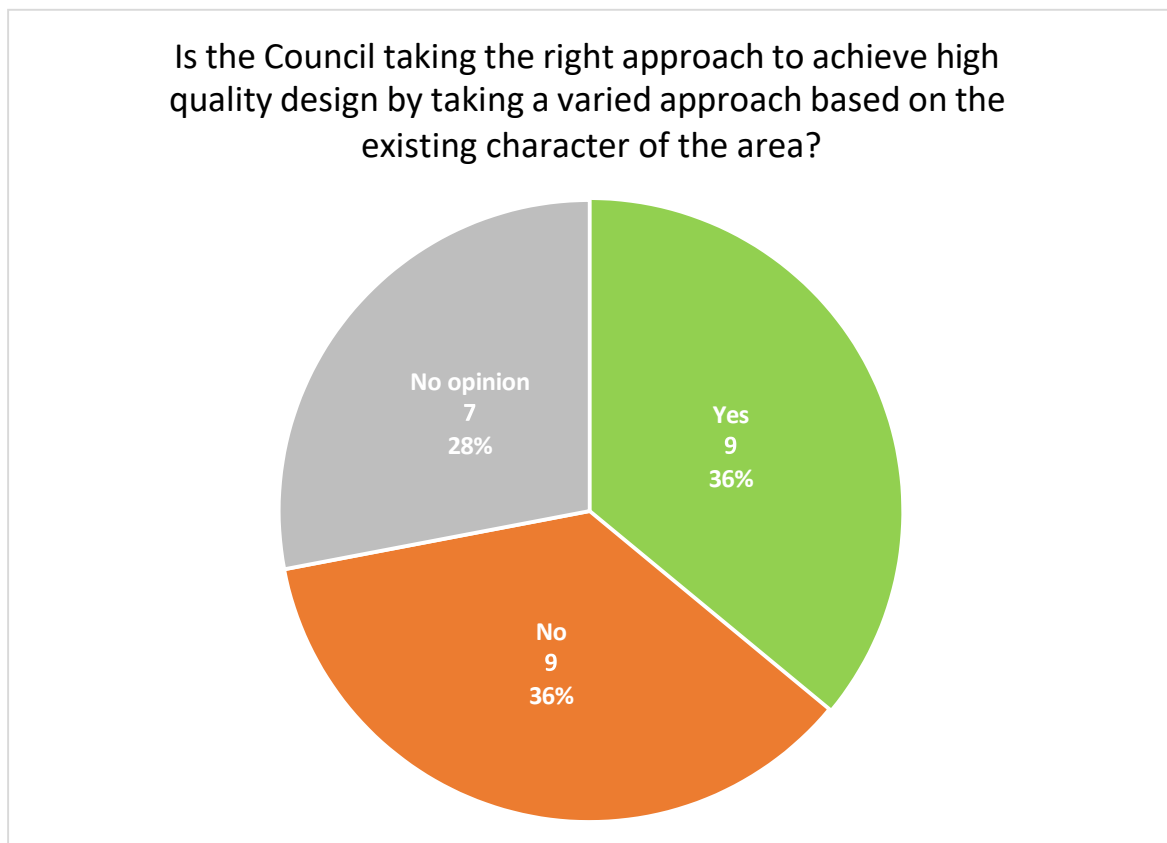
**UDQ1.** Do you think the Council is taking the right approach to achieving high quality design, by varying the approach depending on the character of the area?

Respondents were asked to indicate support for one of the following options:

- Yes
- No
- No opinion

### Outcome

A total of 25 responses were received.



There was no consensus position from respondents to this question.

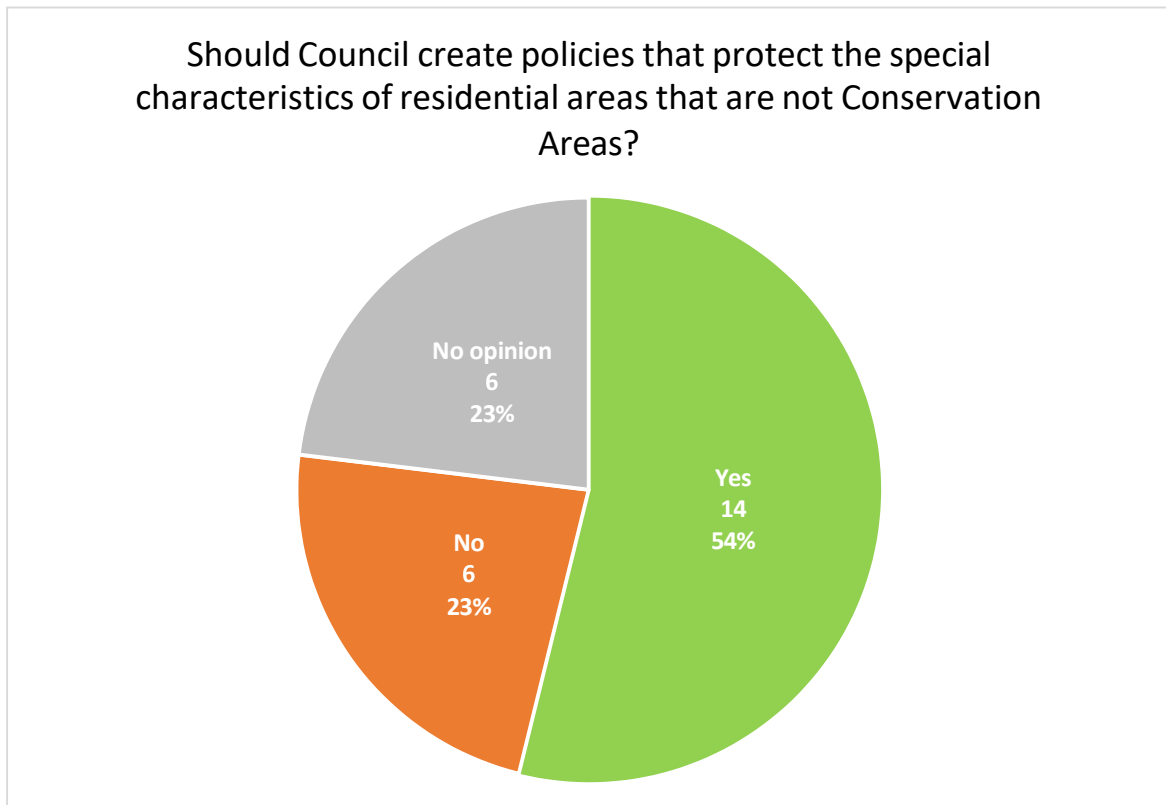
**UDQ2.** Do you think that the Council should create policies to protect the special characteristics of residential areas that are not designated as Conservation Areas?

Respondents were asked to indicate support for one of the following options:

- Yes
- No
- No opinion

**Outcome**

A total of 26 responses were received.



The majority of respondents agreed that Council should create policies that protect the special characteristics of residential areas that are not Conservation Areas.

## Community facilities, education and health

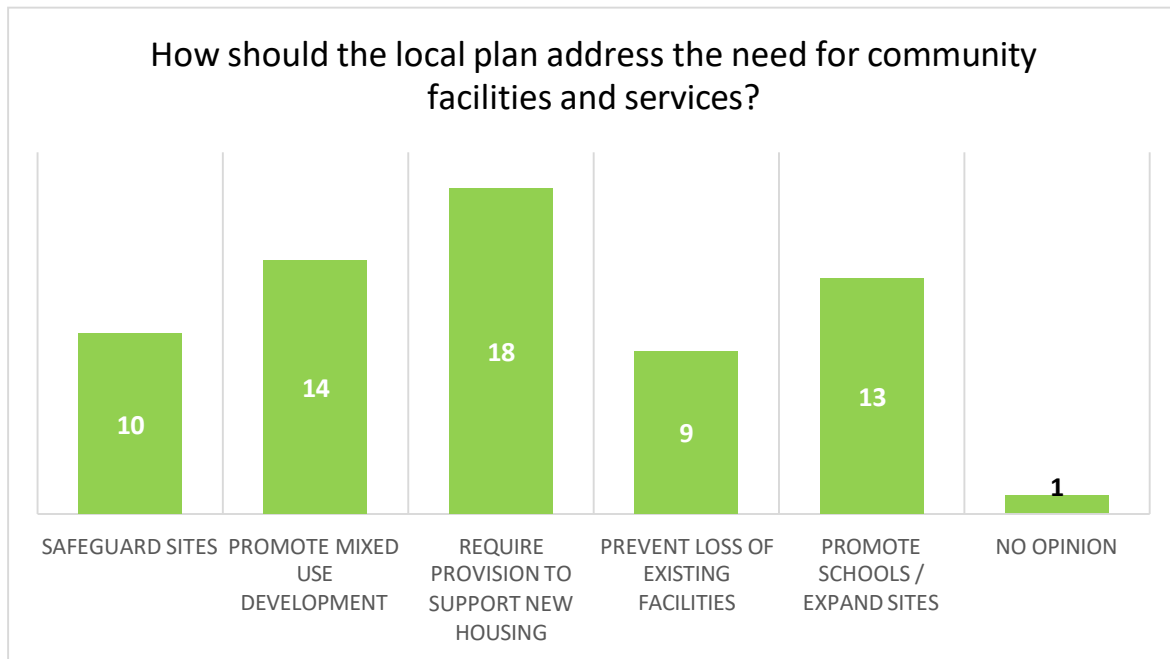
**CQ1.** How should the Local Plan address the need for community facilities and services, including schools and health provision?

Respondents were asked to indicate support for any of the following options:

- Safeguard sites for the future
- Promote mixed use developments e.g. schools and housing on one site
- Require the provision of facilities necessary to support new housing developments
- Prevent the loss of facilities unless there is no demand
- Policy promoting schools or the expansion of existing schools
- No opinion

### **Outcome**

A total of 26 responses were received.



There was broad support for all of the options put forward to address the future need for community facilities and services.

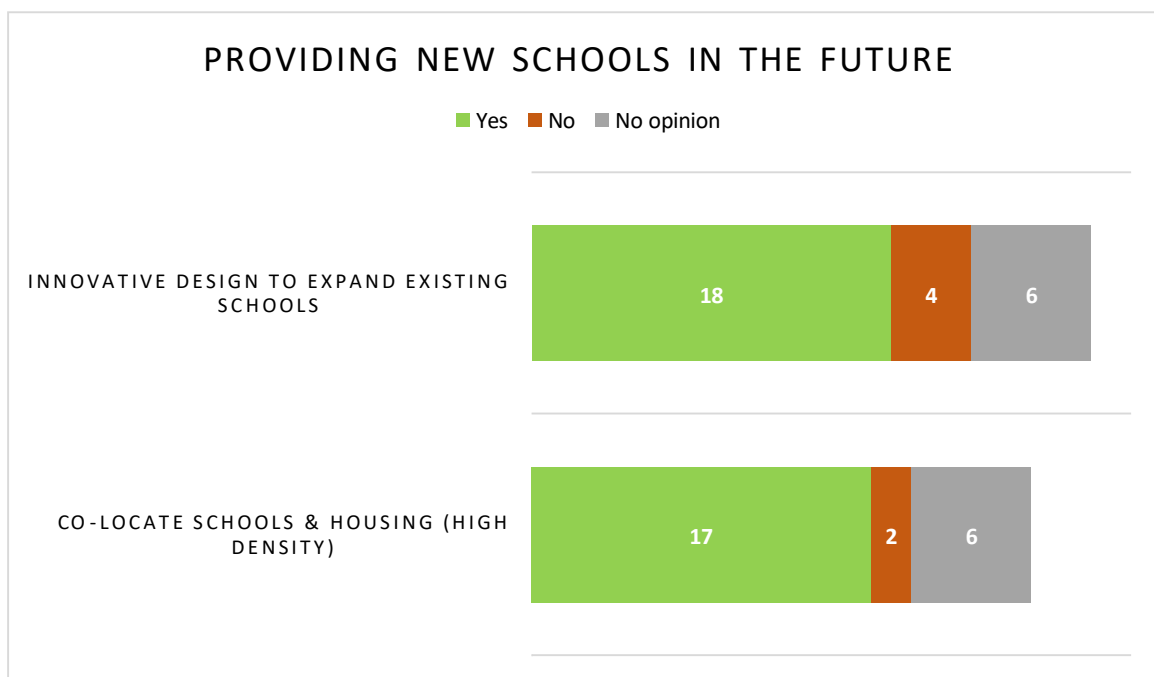
**CQ2.** *In order to provide new schools for the future and to maximise the use of available sites in the residential areas where new school places will be needed, do you agree that...*

Respondents were asked to indicate support for each of the following options:

- Innovative use of design should be allowed in order to deliver school expansion
- The development of school sites to a higher density (school and housing on one site) is acceptable where there is good public transport access

**Outcome**

A total of 28 responses were received.



There was strong support for both options to provide for future provision of schools.

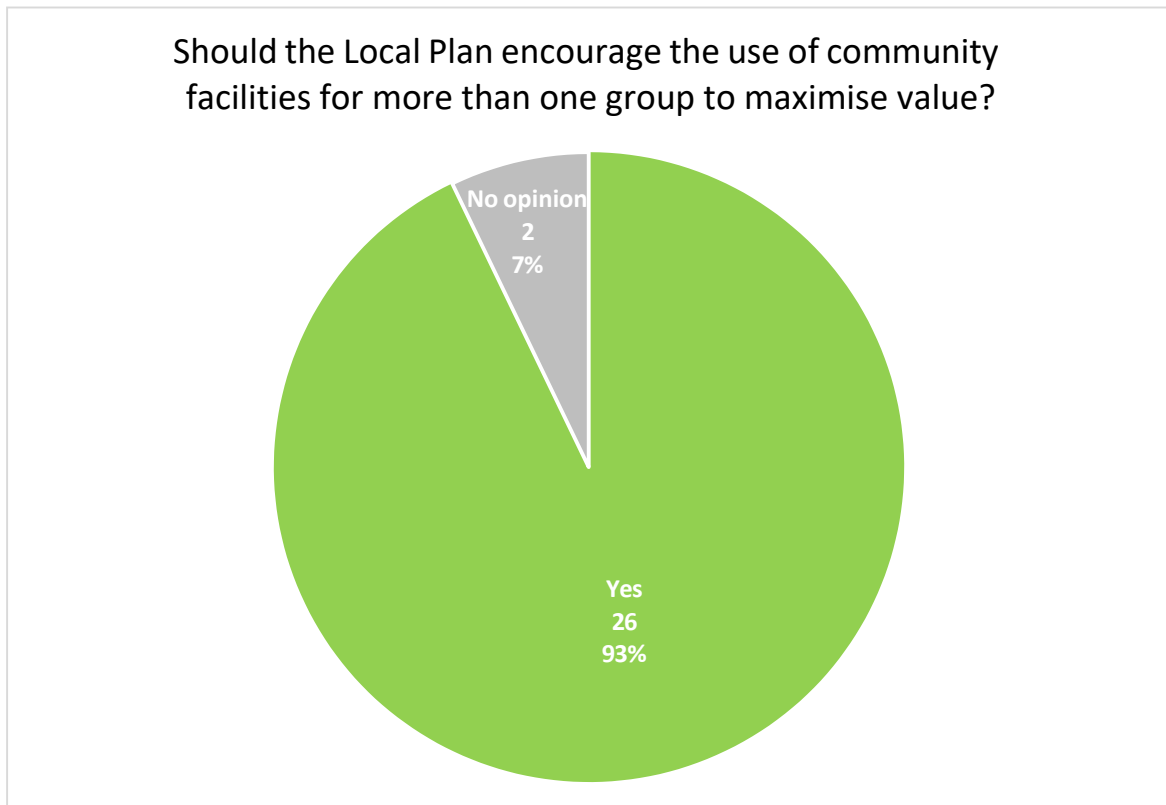
**CQ3.** *Should the Local Plan encourage facilities that could be used by more than one community group to maximise their value to the community?*

Respondents were asked to indicate support for one of the following options:

- Yes
- No
- No opinion

**Outcome**

A total of 28 responses were received.



There was strong support for the Local Plan being used to encourage the use of community facilities for more than one group of people to maximise value.

**CQ4.** *How do you think the Local Plan should support culture, health and well-being and leisure in Lewisham?*

A total of 14 responses were received, with a range of ideas provided, including:

- Ensuring upgrades to community facilities can accommodate increased use
- Retain all, and expand where possible, the use of green spaces
- Avoid overdevelopment
- Provide facilities for children and teenagers to encourage participation in sports, crafts, and other skills
- Stronger emphasis on place making in redevelopment
- Safeguarding community facilities to accommodate an ageing population, including libraries
- Reuse of church halls for clubs, cultural and sports
- Undertake a demographic study to better understand need

One detailed response was received from a takeaway food company. The response stated that takeaway restaurants provide a valuable eating out leisure opportunity for those unable to go out due to time, caring, or other home commitments. The response argued that Council's existing policy on banning fast food takeaways within 400 metres of the boundary of a primary or secondary school (DM Policy 18) had the effect of "scape-goating" particular businesses, and that many years of research had failed to demonstrate whether such policies had a positive effect on public health or well-being.

# Appendix 5: Sustainability Appraisal Scoping Report – Response to Representations

## Representations received – Sustainability Appraisal Scoping Report

ID	Submission Author	Response summary	Officer response
02	Highways England	No comment.	Noted.
03	Historic England	SA needs to be amended so that the framework in which the Local Plan will be assessed is more in line with national planning policy and the expectation that Borough's produce positive strategies for the conservation and enjoyment of the historic environment.	Noted. To be considered in update to the SEA/SA scoping.
		To strengthen the framework of the SA, the indicator for historic environment could include: <ul style="list-style-type: none"> <li>• An indicator that recognises whether a heritage asset is on the Historic England Heritage at Risk Register;</li> <li>• An indicator which measures the number of up to date management plans (principally conservation areas, or other forms of heritage management plans).</li> </ul>	
		It would be useful to explore why there is uncertainty over the compatibility of heritage SA objectives with issues relating to housing, employment and economic growth, when there is extensive evidence the historic environment is delivering on these objectives.	
		Cultural heritage baseline information could be further improved by commenting on the current and future condition of the historic environment including its heritage assets. This could include identifying potential threats which may have an impact upon the significance of heritage assets.	
06	Natural England	Agency noted the consultation and have no comment at this stage of the Local Plan production process.	Noted.
08	Office of Rail & Road	Agency noted the consultation and have no comment at this stage of the Local Plan production process.	Noted.
41	Environment Agency (EA)	Appendix A identifies the Thames Catchment Flood Management Plan and Thames Estuary 2100 Plan as one item. These are actually two separate, but related, plans. This appears to	Noted. To be considered in update to the SEA/SA scoping.



ID	Submission Author	Response summary	Officer response
41	Environment Agency (EA)	<p>have resulted in the Catchment Flood Management Plan not being included within Table 2 of the scoping report.</p> <p>It is recommended that a separate entry is provided for both these plans in both Table 2 and Appendix A. It was noted that the Catchment Flood Risk Management Plan is currently in the final stages of being updated into a Flood Risk Management Plan to meet the requirements of the Flood Risk Regulations 2009. The superseding Flood Risk Management Plan will be published before the end of 2015.</p>	
		<p><b>Additional plans, policies or programmes to consider</b></p> <p><b>National Flood and Coast Erosion Management Strategy (July 2011)</b></p> <p>Objective</p> <ul style="list-style-type: none"> <li>• ensure a clear understanding of the risks of flooding and coastal erosion</li> <li>• set out clear and consistent plans for risk management</li> <li>• manage flood and coastal erosion risks in an appropriate way</li> <li>• ensure that emergency plans and responses to flood incidents are effective</li> <li>• Help communities to recover more quickly and effectively after incidents.</li> </ul> <p>Aim</p> <ul style="list-style-type: none"> <li>• Put in place long-term plans to manage risks ensuring other plans take account of them</li> <li>• Avoiding inappropriate development in areas of flood and coastal erosion risk</li> <li>• Building, maintaining and improving FCERM infrastructure and systems</li> <li>• Increasing public awareness of the risk that remains</li> <li>• Improving the detection, forecasting and issue of warnings of flooding</li> <li>• Planning for and co-ordinating a rapid response to flood emergencies and recovery</li> </ul> <p>It was also recommended that Council consider the:</p> <ul style="list-style-type: none"> <li>• Civil Contingencies Act 2004 and supporting Regulations;</li> <li>• Localism Act 2011;</li> <li>• Growth and Infrastructure Act 2013;</li> <li>• River Basin Management Plan 2015, for baseline status of the river water bodies mentioned in the SA document, but also the groundwater bodies that were not mentioned in the SA (including borehole pumping stations);</li> <li>• National Waste Plan and Waste Prevention Programme;</li> </ul>	Noted. To be considered in update to the SEA/SA scoping.

ID	Submission Author	Response summary	Officer response																
41	Environment Agency (EA)	<ul style="list-style-type: none"> <li>• Water White Paper – Water for Life;</li> <li>• Environment Agency Classification of Water Stressed Areas;</li> <li>• Water Resource Management Plans;</li> <li>• Groundwater Protection: Principles and Practice (GP3);</li> <li>• Guiding Principles for Land Contamination;</li> <li>• Climate Change Adaptation Manual – Evidence to support nature conservation in a changing climate;</li> <li>• Catchment Abstraction Management Strategies, (CAMS) EA;</li> <li>• Water stress classification, EA;</li> <li>• Climate change information for each River Basin District;</li> <li>• Biodiversity Planning Toolkit.</li> </ul>																	
		<p>The baseline flood risk figures in Appendix B have been superseded following a periodic update to our data, though there is not a significant change. Latest figures based upon our National Flood Risk Assessment are as follows:</p>	<p>Noted. The council has undertaken a review of the Level 1 SFRA which will be reflected in future work on the SEA/SA. This SFRA has been informed by the latest EA flood mapping and climate change allowances.</p>																
		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;">Probability of flood</th> <th style="width: 20%;">Total properties within area of flood risk within LBL</th> <th style="width: 20%;">Residential properties within area of flood risk within LBL</th> <th style="width: 20%;">Non-residential properties within area of flood risk within LBL</th> </tr> </thead> <tbody> <tr> <td> <p><b>Significant:</b> The chance of flooding in any year is greater than 1.3% (1:75)</p> </td> <td style="text-align: center;">251</td> <td style="text-align: center;">242</td> <td style="text-align: center;">9</td> </tr> <tr> <td> <p><b>Moderate:</b> The chance of flooding in any year is greater than 0.5% (1:200) but less than or equal to 1.3% (1:75)</p> </td> <td style="text-align: center;">1883</td> <td style="text-align: center;">1702</td> <td style="text-align: center;">181</td> </tr> <tr> <td> <p><b>Low:</b> The chance of flooding in any</p> </td> <td style="text-align: center;">19618</td> <td style="text-align: center;">18523</td> <td style="text-align: center;">1095</td> </tr> </tbody> </table>		Probability of flood	Total properties within area of flood risk within LBL	Residential properties within area of flood risk within LBL	Non-residential properties within area of flood risk within LBL	<p><b>Significant:</b> The chance of flooding in any year is greater than 1.3% (1:75)</p>	251	242	9	<p><b>Moderate:</b> The chance of flooding in any year is greater than 0.5% (1:200) but less than or equal to 1.3% (1:75)</p>	1883	1702	181	<p><b>Low:</b> The chance of flooding in any</p>	19618	18523	1095
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<p><b>Low:</b> The chance of flooding in any</p>	19618	18523	1095																

ID	Submission Author	Response summary				Officer response
		year is 0.5% (1:200) or less.				
		<b>Total</b>	21752	20467	1285	
		<p>The figures above reflect the number of properties located within a flood risk area and so will also include flats and offices that are on the upper floors of buildings raised above the floodwater. Though those additional properties may not experience internal damages from floodwater they may lose safe access and egress from the property and experience a loss of services such as water supply and disposal, as well as electricity. It would be beneficial to identify within the baseline description that the area to the north of the borough with tidal risk from the River Thames benefits from a high standard of protection from the Thames Tidal Defences. There are also flood alleviation measures implemented on the other large watercourses within the borough that help reduce the frequency of flooding.</p> <p>For other most up to date and accurate environmental evidence we recommend using our Data Share service where you can access our environmental datasets and also datasets from Natural England, Forestry Commission and English Heritage.  <a href="http://www.geostore.com/environment-agency/">http://www.geostore.com/environment-agency/</a></p>				
		<p>The issues identified in this report cover most of the sustainability matters relevant to the Lewisham Local Plan. However we have provided some more information as follows:</p> <p><b>Groundwater and contaminated land</b></p> <p><b>To reduce land contamination and safeguard soil quality and quantity</b></p> <p>We would recommend an objective <b><i>to reduce land contamination and safeguard soil quality and quantity</i></b>. Local plans can help to ensure that groundwater is protected and where necessary improved during regeneration and development. Contamination in or on land can present unacceptable risks to human health and the wider environment, including to groundwater.</p> <p>Groundwater is constantly moving and once contaminated it can take a very long time to recover if at all. Therefore, the overarching approach to groundwater protection needs to be considered at the strategic planning stage. Local Plans should identify sensitive groundwater areas along with policies for alternative approaches, such as cross boundary discussions with neighbouring LPAs, Environment Agency (where source protection zones straddle boundaries) and Water Companies</p>				<p>Noted. To be considered in update to the SEA/SA scoping.</p>

ID	Submission Author	Response summary	Officer response
41	Environment Agency (EA)	<p>The outcomes we want to see:</p> <ul style="list-style-type: none"> <li>• Groundwater is protected and improved for the benefit of people and the economy</li> <li>• Future developments are in appropriate locations where pollution and other adverse effects on the local environmental or amenity value are minimised.</li> <li>• Local plan policies and strategies help to ensure that developing land affected by contamination won't create unacceptable risks, or allow existing ones to continue.</li> <li>• Land is managed sustainably, protecting soils and water and contributing positively to reducing the impacts of and adapting to climate change.</li> </ul> <p><b>Climate Change</b></p> <p><b>Objective 7: To mitigate and adapt to the impact of climate change</b></p> <p>The flood risk climate change allowances are being revised to reflect the latest climate projections in UKCP09 and wider flood risk research published since 2009. This is due to be published in autumn 2015 and will replace previous climate change allowance. The main change to the allowances will be for peak river flow. Allowances will be provided for each river basin district, similar to those in 'Adapting to climate change: Guidance for flood risk management authorities'. We will update 'Adapting to climate change: Guidance for flood risk management authorities' so the allowances are consistent. Land use planning decisions should be based on the latest and most accurate climate change data and evidence.</p> <p><a href="https://www.gov.uk/government/publications/flood-and-coastal-risk-guidance-climate-change-allowances">https://www.gov.uk/government/publications/flood-and-coastal-risk-guidance-climate-change-allowances</a></p> <p>Climate change will create opportunities and risks for local authorities. For example, warmer summers may lead to increased demand for leisure and tourism related services, whilst wetter winters will increase pressure on drainage systems. Climate change could have an impact on the following council services: emergency planning, building control, land use planning, local flood and coastal risk management , provision of local infrastructure and green spaces, provision of schools; environmental services including waste management, pollution control and monitoring and environmental health, transport infrastructure and the local natural and historic environment.</p> <p>The council role as estate manager and service provider plays a vital part in ensuring that adaptation is taking place at a local level. For more information please visit <a href="http://www.ukcip.org.uk/government/local-authorities/">http://www.ukcip.org.uk/government/local-authorities/</a>. The council should require development proposals to take account of the expected changes in local climate conditions, throughout the proposed lifetime of the development, by adaptation or flexibility to allow future</p>	

ID	Submission Author	Response summary	Officer response
		<p>adaptation. Information on these measures must be submitted with an application. Specifically, the council should require major developments to:</p> <ul style="list-style-type: none"> <li>• Identify the type of and extent of the main changes expected in the local climate throughout the lifetime of the proposed development.</li> <li>• Identify the potential impacts of these changes on the proposed development and its neighbours,</li> <li>• Indicate the ways in which the proposed development design overcomes the hazards and exploits the opportunities associated with these impacts whilst meeting other sustainable development criteria, particularly the need to achieve overall reductions in greenhouse gas emissions</li> <li>• Environment Agency role in drought</li> </ul> <p>We are responsible for monitoring, reporting and acting to reduce the impact of drought on the environment. We work with water abstractors (such as water companies, farmers and industry) to manage the demand and availability of water and decide whether water company applications for drought permits are reasonable.</p> <p>We have drought plans for all of England which sets out how we will manage water resources during a drought. These plans aim to balance the competing interests of the environment and the need for public water supply. They contain a range of environmental indicators that determine the action we will take to achieve this aim. See <a href="http://www.defra.gov.uk/environment/climate/">http://www.defra.gov.uk/environment/climate/</a></p> <p>For wildlife sites that contain protected species or have a National/European wildlife designation, then Natural England should be involved as well.</p> <p><b>What we do during a drought</b></p> <p>During a drought, we step up our monitoring actions to make sure that we continue to protect the environment from harm. Our ongoing work with water companies and other water users means they have their own plans in place to cope with hot dry spells. We make sure that they do not take too much water from rivers and that they are following their drought plans.</p> <p>We deal with drought permit applications from water companies to allow them to continue abstracting water during drought. The environmental impact and public water supplies are important considerations when deciding whether to grant these applications.</p> <p>Our other key responsibility is to report on the state of water resources during a drought to the public, government and our partners.</p>	

ID	Submission Author	Response summary	Officer response
41	Environment Agency (EA)	<p><b>Water resources and quality</b></p> <p>Water resources are critical to sustainable economic growth and housing development as well as supporting the natural environment. Increasing population and a changing climate will have an impact on water resources in the future. The local plan can help to ensure that water resources are protected and, where evidence justifies, that water efficiency measures are adopted as part of regeneration and development.</p> <p>Water resource planning does not follow local authority boundaries. Planning for water resources and water supply in the emerging Lewisham Plan should reflect the plans of neighbouring local councils and water company resource zones. Cross-boundary working should form part of work under the Duty to Co-operate. The process will be more effective and better informed if it involves water supply companies.</p> <p>The emerging Lewisham Plan should consider the capacity and quality of water supply systems and any impact development may have on the environment, including understanding the supply and demand patterns now and in the future across the borough area. Projected water availability should take account of the impact of a changing climate. Water companies hold information and data to help with this and council should work closely with water companies when they are producing the local plans. This information should be reflected in the Sustainability Appraisal.</p> <p>We would encourage the council to ensure the emerging local plan and major developments identify and plan for the required levels of water efficiency and water supply infrastructure to support growth, taking into account costs and timings/phasing of development. The Infrastructure Delivery Plan can help with understanding of what is needed and is therefore an important part of the evidence base.</p> <p><b>Water efficiency</b></p> <p>We support the use of water efficiency measures to reduce demand on water resources and to accommodate growth in business, housing and population requirements without the need to increase overall consumption.</p> <p>Government intends to implement the Housing Standards Review in 2015, winding down the Code for Sustainable Homes. Building Regulations (Part G) will be updated to include an optional tighter water efficiency standard of 110 litres/person/day (l/p/d), in addition to the current baseline standard of 125 l/p/d. However, this tighter standard would need to be justified with local evidence. On implementation, Local Authorities will not be able to specify any other standards for domestic new build.</p>	

ID	Submission Author	Response summary	Officer response
41	Environment Agency (EA)	<p><b>The role of the Environment Agency in Water Resources</b></p> <p>We have a duty to manage water resources and to plan how to use them in a sustainable way, now and in the future. To do this we plan, monitor and regulate water resource use.</p> <ul style="list-style-type: none"> <li>• We influence the efficient use of water through our regulation of the water industry and through abstraction licensing. We also encourage water efficiency by end users through partnerships with appropriate organisations and influencing through spatial planning.</li> <li>• We oversee the way that water companies plan so that supplies are secure and companies' environmental impacts are minimised, for example through the review of water companies' Water Resource Management Plans.</li> <li>• We work with water companies and other sectors to ensure that effective plans are in place to manage security of water supply and environmental impacts during droughts. This includes producing drought plans and issuing drought permits.</li> <li>• We routinely measure, monitor and report on the water situation across England. This helps us to assess the national and local water situation and the prospects of any water shortages for the environment.</li> </ul> <p><b>Waste management</b></p> <p>Local waste management activities that are poorly run can pollute the environment, cause harm to human health and generate nuisance impacts for local communities. Illegal waste activity can blight local areas as well as polluting the environment and causing harm to human health. Waste and resource management can also support economic growth and the creation of new jobs.</p> <p>Waste management facilities have the potential to pollute the environment through emissions to air, releases to ground and surface water and leaving a legacy of contaminated land. Waste Local Plans can help prevent this by making sure that sites for waste facilities are located and designed to minimise their impact. Improved waste management can also contribute to reducing greenhouse gas emissions, including through the use of waste materials to generate renewable energy.</p> <p>Waste is a strategic matter in two tier areas under Section 33A of the Planning and Compulsory Purchase Act 2004 (as inserted by the Localism Act 2011) and is referred to as one of the strategic infrastructure priorities in the NPPF (paragraph 156). This means that waste will often be subject to the Duty to Cooperate. Effective planning for waste</p>	

ID	Submission Author	Response summary	Officer response
		<p>infrastructure needs to reflect the needs of neighbouring authorities, or further afield in the case of some waste streams such as hazardous waste or other specialist waste streams.</p> <p>The outcomes we want to see:</p> <ul style="list-style-type: none"> <li>• Businesses and other organisations reduce the impacts of their activities on air, land and water, using resources efficiently and minimising waste disposal and manage their waste responsibly.</li> <li>• The right waste and resource management infrastructure is in place.</li> </ul> <p><b>The Waste Hierarchy</b></p> <p>A key principle in the sustainable management of waste is the waste hierarchy. The waste hierarchy is enshrined in law and sets out the best options for managing waste: preventing waste as the preferred option and waste disposal as the least preferred option. The policy framework in Local Plans is expected to drive the management of waste up the waste hierarchy.</p> <p>Paragraph 3 of the NPPW advises that waste planning authorities should...‘drive waste management up the waste hierarchy, recognising the need for a mix of types and scales of facilities, and that adequate provision must be made for waste disposal.’ Movement of waste up the Waste Hierarchy is not just the responsibility of WPAs (Planning Practice Guidance paragraph 8).</p> <p><b>The relationship between planning and other regulatory regimes</b></p> <p>We regulate waste management through a system of permits under the Environmental Permitting Regulations (EPR). Planning and permitting decisions are separate, but closely linked. Planning permission determines if a development is an acceptable use of land. Permitting determines if an operation can be managed on an ongoing basis to prevent or minimise pollution.</p> <p>The NPPW (para. 7) confirms that WPA’s should... ‘concern themselves with implementing the planning strategy in the Local Plan and not with the control of processes which are a matter for the pollution control authorities.’</p> <p>The Environment Agency has three main roles in waste and industry regulation:</p> <ul style="list-style-type: none"> <li>• We are the main organisation responsible for the regulation and permitting of complex industrial processes and waste management activity in England, through the application of statutory regimes (such as the Environmental Permitting Regulations).</li> </ul>	



ID	Submission Author	Response summary	Officer response
41	Environment Agency (EA)	<ul style="list-style-type: none"> <li>• We are responsible for tackling serious illegal waste activity.</li> <li>• We are an advisor to Government and local councils on waste and waste infrastructure planning. We provide data and information on waste, waste management and environmental pressures and limits to help them with their work and decisions</li> </ul>	
		<p><b>Appendix D</b></p> <p><b>Decision aiding questions</b></p> <p><b>Objective 10: To mitigate flood risk</b></p> <p><input type="checkbox"/> There is a bit of confusion within the document in that the objective references differ between Table 4 and Appendix C.</p> <p><input type="checkbox"/> Objective 13 (Table 4) could be expanded to, <i>'To mitigate and reduce flood risk, improve water quality, manage water resources, and restore and enhance the river network.'</i></p> <p><input type="checkbox"/> Using 'flooding incidents' as an indicator for Objective 13 (as suggested in Table 4) is unlikely to give a reliable measure as to the effectiveness of the plan. This is because the probability of flooding occurring is linked with a number of complicated factors, such as weather patterns and ground conditions that are outside of the control of the council's plan.</p> <p><b>Decision aiding questions</b></p> <p><b>Identify sources of fluvial flooding and space to store flood water.</b></p> <p>Example questions to consider:</p> <p>Has an SFRA been prepared and are the conclusions reflected in the Local Plan?</p> <p>Has Flood Zone 3b been defined and safeguarded?</p> <p>Does the Sustainability Appraisal address flood risk management?</p> <p><b>Avoid allocating land for inappropriate development which is in a flood zone.</b></p> <p>Example questions to consider:</p> <p>Does the growth strategy proposed in the plan direct sites away from area at risk from flooding?</p>	Noted. To be considered in update to the SEA/SA scoping.

# Appendix 6: Call for Sites consultation webpage – 2018



[Consultation Hub](#) [Find Consultations](#) [We Asked, You Said, We Did](#)

## Lewisham Local Plan – Call for Sites

### Overview

This consultation will help us prepare our new Local Plan, which once adopted, will comprise part of Lewisham's statutory development plan. Specifically, the consultation will assist the Council in identifying strategic sites for a range of land uses which can support delivery of the spatial strategy for the borough. Where appropriate, sites identified through this consultation may be taken forward in planning policies (such as site allocations or land-use designations). This exercise will help us to plan for the delivery of new housing in Lewisham to meet local need, including for affordable housing.

Closed 1 Nov 2018  
Opened 19 Sep 2018

**Contact**  
020 8314 7400  
[planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk)

**Further guidance notes on this consultation can be accessed from the 'Online Survey' link below.**

### Why We Are Consulting

The Call for Sites is an opportunity for individuals and organisations to make suggestions for the future use or development of land within the borough, which will be considered in the early stages of preparation of Lewisham's new local plan.

*This consultation is entirely 'Optional' and you do not need to participate unless you choose to. Your personal information will only be viewed by members of the Strategic Planning team at London Borough of Lewisham and we will only use them for relevant planning purposes and will not be shared with any third party.*

*The information submitted, other than personal details and contact information, will be made publically available with a summary published as part of the Local Plan evidence base; your name will normally still be displayed.*

*By submitting your contact details to this consultation, you are consenting to be added to the Strategic Planning team's consultation data base, and may be contacted regarding future Strategic Planning consultations. The Strategic Planning database is retained and managed by the Strategic Planning team only, and we will not transfer any data to another territory outside of the EEA. We will hold this data for a maximum of five years, or until, if you request to be removed from our consultation data base sooner.*

*If, at any point, you wish to be removed from our database, please contact [planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk)*

### What Happens Next

We will review all sites submitted through the Call for Sites consultation and assess their potential to be included within the new Local Plan. There will be an opportunity to comment on the allocation and designation of sites during the next stages of public consultation on the draft Local Plan.

# Appendix 7: Call for Sites Guidance & response form – 2018

## Lewisham Local Plan – Call for Sites

### Guidance & response form

#### A new Local Plan for Lewisham

Lewisham Council is undertaking a review of its Local Plan to ensure the plan remains up-to-date and continues to provide a sound basis for managing development locally. This review will inform preparation of a new Local Plan for Lewisham.

Our current Local Plan is made up of a package of documents which form the Council's statutory development plan alongside the London Plan and any future neighbourhood plans. The Local Plan sets out a vision for Lewisham and the planning policies which will deliver this vision.

The Core Strategy, which was adopted in 2011, is currently the main Local Plan document for Lewisham. It is supported by 3 other documents:

- Site Allocations Plan(2013)
- Lewisham Town Centre Plan (2014)
- Development Management (2014) Plan.

Lewisham's adopted Local Plan can be accessed online.

#### What is the Call for Sites?

The Call for Sites is an opportunity for individuals and organisations to make suggestions for the future use or development of land within our borough. It will run from **19 September 2018 to 1 November 2018** and inform preparation of the new Local Plan by helping us to identify strategic sites for a range of uses to support delivery of the spatial strategy. Where appropriate, sites may be taken

forward in planning policies as site specific allocations or land-use designations.

#### How does this relate to the Greater London Authority (GLA) call for sites?

The Mayor of London is currently preparing a new London Plan. To help with the London-wide Strategic Housing Land Availability Assessment (SHLAA), the GLA published a Call for Sites in spring 2016. This was advertised by Lewisham Council on behalf of the GLA. Members of the public were invited to submit sites with potential for residential and mixed-use development. Lewisham's Call for Sites has a wider scope and is interested in a wider range of land uses, including housing and employment.

#### What if I have already submitted a site?

If you have already submitted a site through the latest London Plan SHLAA process or the previous Lewisham Call for Sites in May-June 2015, then you do not need to re-submit the site through this current exercise (unless you are proposing different uses) - the Council will ensure that all sites identified through these earlier processes will be considered in our Local Plan review.

#### How should I respond to the Call for Sites?

If you would like to put forward a site to be allocated for development or a specific land use, please complete the online form and submit a map as specified.

We are particularly interested in sites over 0.25 hectares, or those that could potentially accommodate 10 or more new homes or 500 square metres or more commercial floorspace. Sites should be deliverable and developable within the plan period (i.e. the next 15 years).

All sections of the form should be completed to the best of your knowledge. Detailed information of the type requested in the form will help us to assess site

proposals and their appropriateness for inclusion in the Local Plan.

All submissions must be accompanied by an Ordnance Survey map at A4 or A3 size, clearly showing the boundaries of the site outlined in red.

A completed form and map for each site should be returned by **1 November 2018**:

Email:  
[planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk)

Post:  
Strategic Planning Team  
Laurence House  
1 Catford Road  
SE6 4RU

### What happens next?

We will review all sites submitted through the Call for Sites process and assess their potential to be included within the new Local Plan. There will be an opportunity to comment on the allocation and designation of sites during the next stages of public consultation on the Local Plan review, a timetable for which is set out in our Local Development Scheme and can be accessed online.

Please note that submitted sites may not necessarily be taken forward in the new Local Plan.

All sites will be objectively assessed against a range of policy constraints and sustainability criteria – this is in order to ensure that site allocations and designations deliver the objectives of the Local Plan, having regard to regional and national policy as well as Lewisham's latest technical evidence.

Our assessment will also consider whether sites are:

- Deliverable (i.e. available now, in a suitable location for the proposed use(s) with a realistic prospect that

development can be achieved within 5-years and viable); and

- Developable (i.e. in a suitable location for the proposed use(s), with a reasonable prospect that the site will be available in the next 6-15 years for development and viable).

### Your data

Personal details will be kept secure and we will only use them for relevant planning purposes.

The information submitted, other than personal contact information, will be made publically available with a summary published as part of the Local Plan evidence base; your name will normally still be displayed.

Please indicate on the response form if you would like to be kept informed of plan progress and future consultation opportunities by being included on our Local Plan contact list.

# Lewisham Local Plan – Call for Sites Response Form

Please identify specific sites within Lewisham Borough that you consider should be brought forward for development within the 15 year lifetime of the Local Plan (i.e. up to 2033). All responses must be submitted using this response form and be accompanied by a site plan as specified in the guidance note. Each site should be submitted using a separate form and site plan. All sections of this form should be completed.

To ensure a consistent approach in the call for sites process, we will be unable to accept and assess sites which have not been submitted using this form.

## Part 1 – Personal Details

Name	
Organisation (if applicable)	
Representing (agents only)	
Address	
Telephone number	
Email	

Please note that anonymous submissions cannot be accepted as we will need to be able to contact you in the future.

## Part 2 - Interest

State your interest in the site by selecting one of the following:	
Freehold owner	
Leaseholder	
Developer	
Resident	
Community Group	
Other (please specify)	

## Part 3 – Site Information

Site address	
<ul style="list-style-type: none"> <li>• Full address including post code</li> <li>• OS Grid reference (if known)</li> <li>• Attach site plan (Ordnance Survey map at A4 or A3 size, clearly showing the boundaries of the site outlined in red)</li> </ul>	

Site size	
<ul style="list-style-type: none"> <li>• Site size in hectares</li> </ul>	

Current use
-------------

<ul style="list-style-type: none"> <li>Identify the current or most recent use of the site (include planning Use Classes where possible)</li> </ul>	
---	--

<b>Planning status</b>	
<ul style="list-style-type: none"> <li>Include details of previous planning applications on the site (including case reference numbers and associated details if known)</li> </ul>	

<b>Future use(s)</b>	
<ul style="list-style-type: none"> <li>Details of the uses you consider are appropriate for the site, including planning Use Classes where possible (e.g. Residential dwelling houses – Use Class C3; Business – Use Class B1)</li> </ul>	

<b>Site constraints</b>	
Provide information on any known site constraints which may present challenges to the future development of the site, including for proposed future uses, in accordance with the following main categories	
<ul style="list-style-type: none"> <li>Environmental constraints (e.g. flood risk, land contamination, hazardous substances, air quality management area)</li> </ul>	
<ul style="list-style-type: none"> <li>Planning policy designations and constraints (e.g. open space, conservation area, listed building, industrial land)</li> </ul>	
<ul style="list-style-type: none"> <li>Delivery constraints (e.g. multiple ownership, leasehold restrictions, legal covenants, requirements for land acquisition)</li> </ul>	
<ul style="list-style-type: none"> <li>Other – any additional information relevant to development deliverability which you wish to bring to the Council's attention</li> </ul>	

<b>Timescales for delivery</b>	
Please state when do you expect the site to become available for development by selecting one of the following:	
Immediately	
Up to 5 years (2018-2023)	
5-10 years (2023-2028)	
10-15 years (2028-2033)	
Beyond 15 years	

Not known	
Will the development need to be phased? If so, please provide details of the likely phasing.	

Site ownership	
Please state ownership details as appropriate:	
• The site has a single freeholder	
• The site has multiple freeholders	
• The site has a single leaseholder	
• The site has multiple leaseholders	

Other information	
• Provide any other information that you consider relevant to the site	

Part 4 – Local Plan contact list

Local Plan updates	
• Please tick box if you wish to be added to our contact list and kept informed about Local Plan progress and updates	

# Appendix 8: Lewisham Land Owner Site Survey 2019



Strategic Planning Team  
London Borough of Lewisham  
Laurence House  
1 ~~Catford~~ Road  
~~Catford~~  
London  
SE6 4RU

~~direct~~ line 020 8314 3885  
[planning\\_policy@lewisham.gov.uk](mailto:planning_policy@lewisham.gov.uk)

~~date~~ 29 August 2019

Dear Sir/Madam,

## Re: Lewisham Site Survey 2019

We are currently preparing the Lewisham Local Plan, which will shape the development and regeneration of the borough up till 2033. As part of this process, we are considering future development opportunities on a range of strategic sites, including **XX**.

We are now seeking to engage with landowners at an early stage, before going out for formal public consultation in 2020. You have been identified through a land registry search as a freeholder for part, or the whole, of this site. This is an opportunity for you to work with us on this initial phase of drafting the site allocations, so that you can tell us your aspirations and proposals for the site. To gain a greater understanding, it will be helpful if you could complete the attached survey form, telling us:

1. if you have comments regarding the site boundary;
2. whether you have aspirations to develop the site;
3. the type and scale of development that you think is suitable on the site;
4. other benefits that could arise from developing the site;
5. whether there is a realistic chance of the site being developed;
6. when you think development is likely to occur;
7. **if** there are any barriers that might delay or constrain development, and how they can be overcome.

Please fill out the questions relevant to your site where details are known, or otherwise provide a best guesstimate.

We are sending this letter to you as a landowner but we recognise that there will be other people whom have an interest in the site. Please circulate this letter to others as appropriate and provide contact details on the attached form so that we can keep in contact with all of the involved parties.

You can post the completed form to us at the address at the top of this letter. If you would prefer to fill out the form electronically, send your email address and site address (shown in bold text above) to [planning\\_policy@lewisham.gov.uk](mailto:planning_policy@lewisham.gov.uk) and we will email the form to you. Please send us your completed form, either by email or post, to arrive by 5pm on Friday 11 October 2019.

Thank you for participating in this initial survey. We will keep you informed as we progress the Local Plan and will notify you as and when further opportunities to comment on the site allocations arise.

Yours sincerely,



**David Syme**  
Strategic Planning Team Manager



## Lewisham Sites Survey 2019

Site name/address: XX

1. Do you have any comments to make regarding the site boundary?

2. Do you have any aspirations to develop the site?

*For example: Have held discussions with the Council, have held discussions with surrounding land owners, have held discussions with other organisations, have sought planning advice, have considered as part of a review of current assets, have considered it but not raised this as a possibility before, have never considered development before, have already ruled out redevelopment of the site.*

3. What type and scale of development do you think is suitable on the site?

*Please provide estimates: Number of residential units proposed, split between market, intermediate and social/affordable rented housing units, split between flats and houses, split between bedroom sizes 1, 2, 3, 4+, non-residential floorspace m<sup>2</sup> and split between different uses (A, B, D, Sui Generis).*

4. What other benefits could arise from developing the site?

*For example: Improved housing mix and quality, new transport infrastructure, better quality environment, amenity and/or open space, town centre renewal, accompanying social, health, educational and/or leisure/recreational facilities, regeneration of existing area.*

5. Is there a realistic chance of the site being developed?

For example: *Site is vacant and ready to be developed, site has a development partner/finance, site is still in use/has leases, will need to find a partner/finance to develop the site, by when could construction commence.*

6. When do you think development of the site is likely to occur?

Please provide estimates: *years when the development is likely to be constructed 0-5, 6-10, 11-15 or beyond, average number of units to be completed each year, phasing details.*

7. Are there any barriers that might delay or constrain development of the site, and how can they be overcome?

For example: *Physical - flood risk, pollution, amenity, access, utilities, environmental  
Policy designations - (industrial land, open space, nature conservation, heritage, retail, wharves  
Delivery - land ownership, utilities and infrastructure provision, co-ordination with other organisations, stalled site, long lead in required, slow build out expected*

8. Are there other landowners, leaseholders, agents, developers, house builders, housing associations, anyone else involved in the site?

Please list their details below so that we can keep in contact in the future

Name	Organisation	Email	Telephone
number			

9. Please tick box if you wish to be added to our contact list and kept informed about Local Plan progress. Under the new General Data Protection Regulation (GDPR), by ticking this box, you agree for the Strategic Planning Team to hold your details, and to be contacted as and when needed. You can still withdraw your consent at any time by requesting to be removed from the contact list via [planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk).

10. Please provide other information/thoughts that you consider relevant to the development of the site.

Continue on a separate page if necessary