

Appendix B

Consultation Summary – Local Plan: Main Issues and Preferred Approaches

1. Background

- 1.1. This briefing note provides a high level summary of feedback received from the public consultation on the draft Lewisham Local Plan: Main Issues and Preferred Approaches document (Regulation 18 stage).
- 1.2. The public consultation on the draft Local Plan was held from 15th January to 11th April 2021. More than 1,400 local residents, businesses, community groups, landowners and organisations responded. This resulted in several thousand detailed comments on the plan proposals covering a range of policy topic areas.
- 1.3. Consultation feedback has been considered by officers and is being used to inform the draft 'Proposed Submission' version of the Local Plan (Regulation 19 stage). This revised plan will be subject to a further round of public consultation before the plan is submitted to the Secretary of State for Levelling Up, Housing and Communities for public examination.
- 1.4. A full Consultation Statement will be published alongside the Local Plan 'Proposed Submission' document. This will include a detailed schedule of comments received at the Regulation 18 stage and how these have been taken into account.

2. Consultation feedback

- 2.1. The following tables provide a snapshot of the key issues raised during the public consultation. These issues are organised around each of the main parts/sections of the draft Local Plan.
- 2.2. The focus here is on points of public concern or contention rather than areas where there is general support for the proposals. In addition, the tables provide a short commentary on actions required by officers to address consultation comments as work on the plan progresses.

Part 1: Planning for an Open Lewisham	
Comments	Reflections and next steps
Vision and objectives Broadly supported but some have questioned if the plan is deliverable , given limited financial resources available to Council and stakeholders post-Covid.	The Local Plan is required to be viability tested in order for the Council to demonstrate that it is deliverable. The Council has prepared a draft Viability Assessment which will be updated to take account of the revised policies.

	<p>As a local planning authority, the Council is setting the long-term planning and investment framework for the Borough. The Council is just one of many stakeholders and partners that will support the plan's delivery.</p>
Spatial strategy	
<p>Challenge to the growth assumptions underpinning the plan, recognising it was prepared prior to peak of Covid.</p> <p>There are also comments from people who are not supportive of further development and growth in the borough.</p>	<p>The housing target is set by the London Plan (2021) and the Council is required to demonstrate how this will be met – the borough's new target of 1,667 net homes per year is up 20% from the previous target. We are clear that this is a challenging target but the Local Plan will help to ensure that growth is well managed and appropriately supported by infrastructure.</p> <p>The Local Plan and Infrastructure Delivery Plan will be updated taking account of new technical evidence. This includes the GLAs latest population projections, which notably continue to indicate significant growth over the long term. A new retail study and Strategic Housing Market Assessment have also been commissioned.</p>
<p>More clarity sought on what happens if the Bakerloo line extension is delayed or is not delivered within the plan period.</p>	<p>The Local Plan assumes the BLE will not be delivered. This is a soundness matter likely to be raised at the plan's examination. At the same time the plan supports the business case for the BLE, safeguards land/sites needed, and provides flexibility to respond to its delivery.</p> <p>The plan will be amended to be clear that the Council's priority is to secure the BLE – but also provide assurances about how growth will be managed in its absence.</p>
<p>More detail sought about the London Plan Opportunity Areas and how growth / investment will be managed within them. The A21 and A2 Corridors are well captured but there is concern about lack of detail on Deptford Creekside.</p>	<p>Officers consider that the plan has addressed Deptford Creekside, but acknowledge that the Local Plan could be amended to provide more clarity on the London Plan Opportunity Area objectives.</p>

Part 2: Managing development

Comments	Reflections and next steps
High quality design	
<p>Many concerns about harm to and/or loss of local character – this was a common theme raised across most policy areas, not just design.</p> <p>These concerns are mainly centred on building heights and density, with many opposing tower blocks</p>	<p>The London Plan seeks to facilitate higher density development across London in order to meet the Capital's housing needs. It also makes clear that tall buildings are part of the solution to the housing crisis – it directs boroughs to identify locations suitable for tall buildings and to set threshold heights in their Local Plans.</p>

<p>(e.g. citing harmful cluster of buildings in Lewisham town centre, emerging Leegate proposals, etc.).</p> <p>More clarity sought around locations appropriate for tall buildings and guidance on heights in different areas, with many people seeking that the Local Plan impose restrictions.</p>	<p>The Local Plan is informed by a Characterisation Study, which was subject to public consultation. This set out areas which are most appropriate for accommodating growth/transformation, and those where existing character should be retained/reinforced.</p> <p>In response to consultation feedback, further work on the Tall Buildings Study has been commissioned. The study will be used to set threshold building heights for different areas of the borough – this will be a more prescriptive approach than included in the Regulation 18 plan, and one that better aligns with the direction of the London Plan.</p> <p>The Council is also preparing a suite of planning guidance to help ensure that higher density development responds positively to the local context. This includes the Small Sites SPD, A21 Development Framework, and Catford Town Centre Framework.</p>
Heritage	
<p>As above, many concerns about harm to and/or loss of heritage assets and historical character.</p>	<p>The Local Plan provides a refreshed suite of policies to help ensure the preservation and enhancement of heritage assets. Historic England has submitted representations to the Local Plan and these will be taken into account, along with wider public feedback.</p> <p>The Council's Conservation Team is currently preparing detailed appraisals of selected site allocations where Historic England has made specific comments. The appraisals will be used to inform the plan policies (e.g. development requirements and design guidelines).</p>
<p>Suggestions for residential areas to be designated as Areas of Special Local Character.</p>	<p>Areas of Special Local Character are non-designated heritage assets. The Local Plan will be amended to provide more clarity around current ASLCs. It will also provide details on the Council's process for identifying additional ASLCs.</p>
<p>Support for policy approaches but suggest that more needs to be done about planning enforcement.</p>	<p>Planning enforcement is outside the scope of the Local Plan.</p>
Housing	
<p>Support for genuinely affordable housing and 50% target. However doubts remain that new housing will be affordable to local people – Council not currently meeting its 50% target so how will new Local Plan change this.</p>	<p>The Local Plan is clear that the Council's priority is for more genuinely affordable housing, based on local income levels.</p> <p>The London Plan 'viability tested' route means that developments providing at least 35% affordable housing do not need to submit a viability assessment, and are acceptable in principle in</p>

	<p>terms of provision. Not all private developments will therefore deliver on the 50% target.</p> <p>The public sector and registered providers will also bring forward schemes that boost delivery of genuinely affordable housing (e.g. estate renewal and regeneration).</p> <p>The Local Plan is seeking for first time that minor housing schemes (less than 10 units) make a financial contribution towards affordable housing. This money can be pooled to support the Council's homebuilding programme.</p> <p>The Council is preparing an update to the Strategic Housing Market Assessment (SHMA) to ensure evidence of housing need is robust and up-to-date.</p>
<p>More family homes are needed not 1 and 2 bedroom flats. This links in with opposition tower blocks, and position that high rises without garden space are inappropriate for families.</p> <p>Reflections on Covid-19 lockdown and what makes suitable living space.</p>	<p>The Local Plan seeks to restrict the conversions of family homes unless a family sized unit (3+ bed) is retained.</p> <p>The Local Plan will be updated to set a target housing size mix for new affordable housing (i.e. number of bedrooms). The mix will be informed by the SHMA update.</p> <p>In addition, the Local Plan will be amended to make clearer the need for major housing developments to provide a reasonable proportion of family units. This will be considered on a case-by-case basis taking into account viability.</p> <p>The Local Plan adopts the London Plan housing standards, which reflect the nationally described space standards.</p>
<p>Local plan needs to set a 10-year target for gypsy and traveller accommodation as per London Plan.</p> <p>Petition opposing new gypsy and traveller site at Poole Court.</p>	<p>The Local Plan will be amended to include a 10-year target based on the Council's Gypsy and Traveller Needs Study. The target is 6 pitches which the Poole Court site allocation makes provision for.</p> <p>There is a significant risk that the Local Plan will be found unsound if provision for travellers is not made.</p>
Economy and culture	
<p>A wide range of views on the employment land strategy, particularly on sites proposed for mixed-use or co-location of uses.</p> <ul style="list-style-type: none"> • Assurances that there will be no loss of industrial capacity • Developers/landowners broadly supportive, several already in pre-app on these sites 	<p>The London Plan provides a direction for boroughs to intensify uses and development on industrial land.</p> <p>The Local Plan identifies sites for employment-led, mixed-use development. This will incentivise redevelopment of sites for modern business space, new homes and public realm improvements. The approach is also underpinned by place-making and will support the spatial strategy.</p>

<ul style="list-style-type: none"> Some local business owners / leaseholders concerned about loss of business or displacement The Local Plan needs to respond to new planning legislation, including changes to the Use Classes Order 	<p>The Local Plan will be amended to clarify how it will deliver new workspace whilst ensuring there is no net loss of industrial capacity in the borough. It will also need to respond to recent changes to the Use Classes Order, which have widened the scope of permitted development rights (i.e. easier to change use between certain types of business uses, including office and light industrial uses).</p> <p>Officers will review the consultation responses and consider the need to amend site allocation boundaries or development requirements.</p> <p>Officers will continue to meet with the GLA to discuss necessary amendments for conformity with London Plan.</p>
<p>The Local Plan does not reflect the key role that Lewisham plays in London's Central Activity Zone (CAZ). This is especially in terms of logistics, last mile delivery, etc. for central London economy.</p>	<p>The Local Plan will be amended to refer CAZ and Lewisham's role in supporting it. This will mainly be through support for complementary commercial activities in designated Strategic Industrial Locations.</p>
<p>Questions about the robustness of retail floorspace needs figures, given impact of Covid-19 and Brexit and acceleration of online shopping</p>	<p>The Regulation 18 Local Plan was informed by a 2019 Retail Study, which indicated only modest growth in retail floorspace.</p> <p>However in response to consultation feedback a new Retail Impact Assessment and Town Centre Trends study has been commissioned - interim findings suggest a significant reduction in need for retail floorspace over the plan period. The final study will inform the revised Local Plan.</p>
<p>The plan does not account for changes to permitted development rights.</p> <p>The Use Classes Order has been updated, with a new Class E (covering most non-industrial commercial uses). Permitted Development rights now make it easier to change from Class E uses (shops, offices, etc.) to housing. It is also easier to change business uses with Class E.</p>	<p>The Local Plan town centre policies will need to be amended taking into account the changes to the Use Classes Order and expanded Permitted Development rights. The approaches for managing uses in the Council's adopted plan and draft Local Plan will need to change quite significantly as a result.</p> <p>Separate from the Local Plan officers will be undertaking preliminary work to scope the case for an Article 4 Direction, which may be needed to protect the business function of employment areas and town centres.</p>
<p>Cultural quarters and night-time economy hubs – whilst broadly supported there were some concerns about impact on local amenity, particularly in the evening and night-time.</p>	<p>The draft Local Plan already includes policies around the protection of local amenity. Officers will consider the scope to strengthen these policies.</p>
Community infrastructure	
<p>Concerns that the Local Plan does not make sufficient provision for</p>	<p>The Infrastructure Delivery Plan sits alongside the Local Plan and has been prepared by officers</p>

new community facilities to support growth.	<p>This is coupled with concerns about the future of existing facilities – lack of investment / falling into disrepair, closures, etc.</p> <p>Many comments on site allocations which include existing health care facilities (where the Local Plan supports mixed-use redevelopment but only where suitable replacement provision of the facility is made, or where its rationalisation is linked to a published asset management strategy).</p> <p>NHS property services have also identified an additional site they would like considered for redevelopment, with re-provision of facilities.</p>	<p>liaising with providers – including NHS, school place planning team, etc. At this time, officers consider that sufficient provision has been made for the infrastructure required to support the levels of growth planned.</p> <p>The draft IDP will be updating taking account of GLAs latest population projections, new technical evidence and information provided by stakeholders. This will be considered as work on the plan progresses.</p> <p>Officers will investigate opportunities for the Local Plan to provide more specific parameters around community facilities in the site allocations. Where there is information available from a Council-led asset management review, this will be taken into account.</p> <p>All sites submitted to the latest 'call for sites' will be considered for inclusion in the plan, in line with our site screening methodology.</p>
Green infrastructure		
<p>There was a significant amount of interest in this section of the plan. A high volume of comments requesting:</p> <ul style="list-style-type: none"> • More and stronger protections for green spaces and nature sites • Clarifications around the terms 'open space' and 'green space' and the level of protection afforded to each • Requests for additional sites to be designated and protected • New evidence prepared so it is up-to-date 	<p>The draft Local Plan was informed by a number of studies including: Open Space Assessment, Sites of Importance for Nature Conservation Review, Metropolitan Open Land (MOL) Review.</p> <p>In response to the public consultation the Council has commissioned an additional Open Spaces Study and MOL Review Update. These are focussed study updates where the scope has been set in response to the main issues raised through the consultation. The final studies will be used to inform the Local Plan.</p>	
<p>More detail required about how the plan will deliver Biodiversity Net Gain (BNG).</p>	<p>The Local Plan has a dedicated section on Green Infrastructure with a refreshed suite of policies, includes new requirements for urban greening and the provision for new green space on large site allocations (e.g. Surrey Canal Triangle, Convoys Wharf, Bell Green Retail Park).</p> <p>Officers will review the draft Local Plan and seek to strengthen approaches on BNG and to provide more clarity on how this will be achieved.</p>	
Sustainable design and infrastructure		
Comments that the Local Plan does not go far enough in	Transport and housing are the two highest contributors to carbon emissions in the borough	

<p>responding to the climate emergency. This is particularly in respect of sustainable design standards and reducing carbon emissions.</p>	<p>(more than half of emissions from energy use from homes).</p> <p>The Local Plan provides a significant step change towards discouraging / reducing need for private car use – this is covered in the transport section.</p> <p>For new housing and commercial development, the Local Plan aligns with the London Plan requirements on energy efficiency, carbon reduction, cooling, etc. A balance will need to be struck to ensure the Local Plan requirements do not significantly impact on development viability, for example, compromising the Council's ability to secure genuinely affordable housing, infrastructure and public realm enhancements.</p> <p>In response to consultation feedback and Member interest, the Local Plan will be amended with new policies on sustainable retrofitting and embodied carbon emissions (which are separate from the 'operational' emissions covered by the London Plan).</p> <p>However it must be recognised that the Local Plan has very limited scope to intervene with existing housing stock - for example, we cannot require domestic refurbishments to a specific standard, unless alterations are such that they require planning consent. Many retrofitting measures will be permitted development, or not development at all (e.g. energy efficient fixtures). Grant funding for retrofitting will also be an important consideration, which the Local Plan has no control over.</p> <p>Officers have been and will continue to liaise with colleagues in the Climate Resilience team to ensure alignment with the Council's Climate Change Action Plan.</p>
<p>Some consider that there are many loopholes for developers to exploit i.e. carbon offsetting, loosely worded policies, etc.</p>	<p>The London Plan recognises that feasibility issues may prevent zero-carbon developments, so offsetting is permitted. The Local Plan makes clear that carbon offsets should be used in exceptional circumstances, with funds secured to be reinvested into local green projects. Our Carbon Costing is currently higher than the price set in the London Plan guidance, and we will seek to carry this forward subject to viability.</p> <p>In addition, officers acknowledge that terminology used in the policies such as: development proposals 'should'... or 'will be expected to'... could be strengthened to make the Local Plan more definitive, i.e. 'must' or 'will be required to'. The plan will be amended as such, wherever possible.</p>

Comments from statutory consultees (e.g. Environment Agency, Thames Water) to help strengthen policies on flood risk management, air quality, etc.)	These comments will be addressed by officers as work on the plan progresses.
GLA has raised concerns about proposals for waste management .	<p>We will continue to liaise with GLA to ensure conformity with London Plan.</p> <p>Lewisham forms part of the South East London Joint Waste Management Group. This group has a planning policy function in delivering waste self-sufficiency – constituent boroughs pool their waste facility capacity to meet the London Plan waste apportionments. Lewisham has a key role with SELCHP.</p>
Transport and connectivity	
High volume of comments received on Low Traffic Neighbourhoods , both in favour and opposition.	LTNs are outside the scope of the Local Plan.
<p>There is overall support for Healthy streets and encouraging modal shift – i.e. discouraging private car use. However, there are also concerns about these approaches where areas are poorly served by public transport.</p> <p>Also, there is a question as to how realistic that Healthy Streets can be delivered on TfL roads (i.e. A-roads).</p> <p>Some suggest plan is ageist by not recognising mobility needs of older people.</p>	<p>The London Plan sets a long-term target for 90% of all journeys made in inner-London to be made by walking, cycling and public transport. The Local Plan has to support this – the Council must be aspirational but also pragmatic in its approach.</p> <p>It is acknowledged that the Council will need to work with GLA and TfL on complex projects to support the Healthy Streets approach e.g. on A-roads, major junctions and key arterial routes. The Council's Local Implementation Plan sets out key projects that will help to support the London Mayor's Transport Strategy. CIL funding and planning contributions can support their delivery.</p> <p>The Council will also continue to lobby the London Mayor and TfL to extend ULEZ to cover whole of borough – this will support Healthy Streets principles on A205.</p> <p>Officers disagree that the plan is ageist. The Local Plan broadly seeks to ensure development is designed to create more inclusive neighbourhoods, and investment in public transport/public realm helps to improve access to local facilities and services.</p>
Transport for London objects to proposals for local car parking standards - the Local Plan is more relaxed than London Plan on car-car-free development	The Local Plan will be unsound if it is not in general conformity with the London Plan. The parking standards will need to be reviewed and updated to ensure conformity, whilst responding to local circumstances wherever possible.

Part 3 – Places and neighbourhoods (including site allocations)

Comments	Reflections and next steps
Central Area	
Most comments raise concerns about overdevelopment of Lewisham and Catford major town centres, opposition to tower blocks, adverse impact on local character, etc.	<p>Lewisham and Catford major centres fall within a London Plan opportunity area, and Local Plan has to reflect this. Growth and managed change within and around the centres are a key part of the spatial strategy.</p> <p>Many sites in Lewisham town centre already have planning consent, so development parameters have been set. The site allocations are included in the plan to help the Council to demonstrate that it can meet its housing targets.</p> <p>Local Plan sets the development strategy for Catford – the Catford town centre framework will support its implementation.</p> <p>As per Part 2 table above – further work on the Tall buildings study has been commissioned and will be used to inform policies on building heights.</p>
Consider that there is a lack of focus on Hither Green . Request that more emphasis given to priorities for area west of Hither Green station (including commercial uses along Springbank Road) and addressing severance caused by the railway.	Part 3 area objectives / policies will be revised to ensure this is better addressed.
Site allocations with high volume of responses: <ul style="list-style-type: none"> House on the Hill – density, height, impact on amenity Aldi, Rushey Green – density, height, impact on amenity Lewisham / Catford town centre sites – density, height, loss of local character, traffic impacts 	Feedback to be considered as work on plan progresses.
North Area	
Requests for the Local Plan to address polluting industry and lorry movements in area. This includes the future of SELCHP - request that alternative use is found owing to pollution and inappropriate use in residential area.	<p>The North Area includes London Plan Strategic Industrial Locations (SIL) which must be safeguarded for commercial and industrial uses. The Local Plan includes refreshed suite of policies to help ensure that local amenity is protected – this includes policies on freight movement.</p> <p>For Locally Significant Industrial Sites (LSIS) in the area, the Local Plan is advocating employment-led mixed use</p>

	<p>redevelopment, which will help to improve the environmental quality of sites in Creekside.</p> <p>SELCHP is critical for London Plan conformity and meeting European Directives for waste net self-sufficiency. The facility provides capacity which enables the Borough to meet its prescribed 'waste apportionment' figure.</p> <p>In addition, the London Plan directs the Local Plan to safeguard existing waste management sites. The loss of facilities can only occur when replacement provision is found elsewhere in London – which is unlikely at the current time.</p> <p>In the interim, the Local Plan seeks opportunities for decentralised energy network development linked to the facility.</p> <p>In response to consultation feedback, officers will review the scope to strengthen requirements for development proposals involving existing facilities (e.g. alterations) to ensure their environmental performance is improved.</p>
Suggestion that play space and healthy school routes need to be given more prominence	The Local Plan introduces a new policy on play and informal recreation that applies across the Borough. It seeks targeted improvements in areas identified as being deficient in access to provision, including parts of the north area.
Comments that Local Plan should focus on re-opening Canal Approach towpath	This is picked up in the new Lewisham Links policy, which helps give effect to the North Lewisham Links project.
Concern there is no plan to increase green space in the area – improved access to riverside and a riverside park should be promoted.	The Local Plan makes provision for new publicly accessible green and open spaces, including by opening up the Riverside and extending the Thames Path e.g. Surrey Canal Walk, improvements at Surrey Canal Triangle, Convoys Wharf.
Site allocations with high volume of responses: <ul style="list-style-type: none"> • Hatcham works – concern about overdevelopment, impact on neighbouring homes • Albany Theatre – concern over loss 	Feedback to be considered as work on plan progresses.
East Area	
Whilst support for regeneration of Lee Green district centre , there are concerns about redevelopment of town centre sites (Leegate Centre, Sainsbury's and BMW). Objections to	Land use principles for Leegate have been established by the extant planning consent. A new planning permission is at pre-application stage, and this will be

<p>emerging Galliards scheme around harm to local character, overdevelopment (density, height) and lack of supporting community infrastructure.</p>	<p>considered against adopted policies should it be submitted.</p> <p>The Local Plan sets clear the development guidelines for these sites to support comprehensive regeneration of the town centre. These will be reviewed in light of feedback received.</p> <p>As per Part 2 table above – further work on the Tall buildings study has been commissioned and will be used to inform policies on building heights.</p>
<p>The Local Plan should reflect community aspirations for an Urban National Park in east area, in line with neighbourhood plan.</p> <p>Many seeking greater protection and enhancement of open spaces.</p>	<p>The Local Plan includes a policy dealing specifically with linear network of green infrastructure in east area – this was informed by and intended to align with the neighbourhood plan. However ‘urban national park’ is not a land-use designation that officers consider can be included in the plan.</p> <p>As set out in Part 2 table above – further work on Open Spaces / MOL has been commissioned and will be used to inform policies on green infrastructure.</p>
<p>Concerns about designation of Blackheath Village as night-time economy hub – what does this mean in practice and what controls will be in place to protect amenity.</p>	<p>The Local Plan seeks to recognise and build on visitor economy in Blackheath. There are policies dealing with protection of amenity.</p>
<p>Site allocations with high volume of responses:</p> <ul style="list-style-type: none"> • Lee Green town centre sites (Leegate, Sainsbury's and BMW) – objection to overdevelopment (density and height), lack of community facilities 	<p>Feedback to be considered as work on plan progresses</p>
South Area	
<p>Broad support for regeneration / redevelopment of retail parks at Bell Green and Lower Sydenham.</p> <p>However comments suggest that more needs to be done to improve walking and cycling environment – car dominance at Southend Land, the gyratory, etc.</p> <p>Local residents requesting a ‘community-led’ masterplan.</p> <p>Concerns about loss of local jobs by redevelopment of Sainsbury's and other retailers.</p>	<p>Local Plan will set the strategic development framework for the area and the public is being consulted through this process.</p> <p>The Council agrees that a masterplan would be beneficial. It has carried out an initial visioning exercise consultation with local community groups.</p> <p>Rationalisation of retail parks / car parking, will allow for a new town centre, with more traditional street based format. Officers envisage businesses like Sainsbury's can continue operating (ground floor uses with residential above)</p>

	and will therefore continue to provide local employment opportunities.
Lack of focus on Downham .	Part 3 area strategy / policies will be revisited to better address Downham.
Concern about loss of community facilities in this part of the borough. Also many comments regarding Bridge Leisure Centre.	As set out in Part 2 table above – provision of community facilities will be addressed through review of the Infrastructure Delivery Plan.
Site allocations with high volume of responses: <ul style="list-style-type: none">• Beadles Garage, Avondale Road – density, height• Sydenham Green group practice – concern about loss of facility• Bestway Cash and Carry – deliverability issues, impact on local amenity	Feedback to be considered as work on plan progresses.
West Area	
Would like to see the community-led masterplan for Forest Hill town centre incorporated into, or given weight, through the plan.	The community-led masterplan has been considered by officers and many of the key principles have been taken forward in the draft Local Plan. However some of the proposals are considered by officers to be unfeasible at the current time – for example, works involving the A205.
Willow Way LSIS / Upper Kirkdale local centre – general support for renewal of employment land and town centre revitalisation. However, high volume comments opposing loss of Dartmouth Motors in the LSIS.	Feedback to be considered as work on plan progresses.
Consider that Drakefell Road and Gellatly Road are ignored or overlooked – more action on this corridor is needed.	Part 3 area strategy / policies will be revisited to better address
Lack of focus on Ladywell .	Part 3 area strategy / policies will be revisited to better address
Site allocations with high volume of responses: <ul style="list-style-type: none">• Willow Way LSIS – loss of Dartmouth Motors MOT• Havelock House – loss of green space, amenity• Jenner Health Centre – loss of health facility	Feedback to be considered as work on plan progresses.

Part 4 – Delivery and monitoring

Comments	Reflections and next steps
Infrastructure funding	
Suggestion to review and update the Planning Obligations SPD alongside the preparation of the local plan. This will ensure the approach to securing S106 is consistent with legislation, national policy and that a	Officers are currently undertaking work to scope an update to the Planning Obligations SPD.

document is ready-made once new Local Plan comes into force.	
Monitoring	
Suggestions from statutory consultees and wider public for additional monitoring and performance indicators to be included.	Monitoring framework will be reviewed and updated where appropriate.

Part 5 – Schedules and appendices

Comments	Reflections and next steps
Schedules	
All comments refer to land-use designations re open spaces and nature sites e.g. suggestions for additional sites to be included, level of protection provided by the designation, etc. (as per the Part 3 - Green Infrastructure section above).	Schedules will be updated in line with recommendations from new studies e.g. Open Space Study and MOL review

General comments

Comments	Reflections and next steps
General	
A number of comments voicing disapproval with the consultation process , including the decision to consult at a time when Covid social distancing restriction were in place	The consultation has been carried out in accordance with the Council's adopted Statement of Community Involvement. The Secretary of State issued a statement making it clear that local plan production should not be unduly delayed during Covid-19. The Government has a target for all local authorities to have adopted up-to-date local plans by 2023. In addition, there are key risks in delaying the plan programme, which are set out in the SDSC cover report.
A wide range of comments were received which officers consider are outside the scope of the local plan (i.e. use and development of land), for example: <ul style="list-style-type: none"> - Park management / maintenance - Litter - Traffic (rat runs) - On-street parking and CPZs - LTNs - Anti-social behaviour - Cost of private housing 	All such comments will be collated by officers and circulated to relevant Council Service Areas for their consideration and action.