



**Local Development Framework
Issues and Options
Public Consultation Summary
PART 1**

**London Borough of Lewisham
Planning Policy
April 2007**

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Introduction

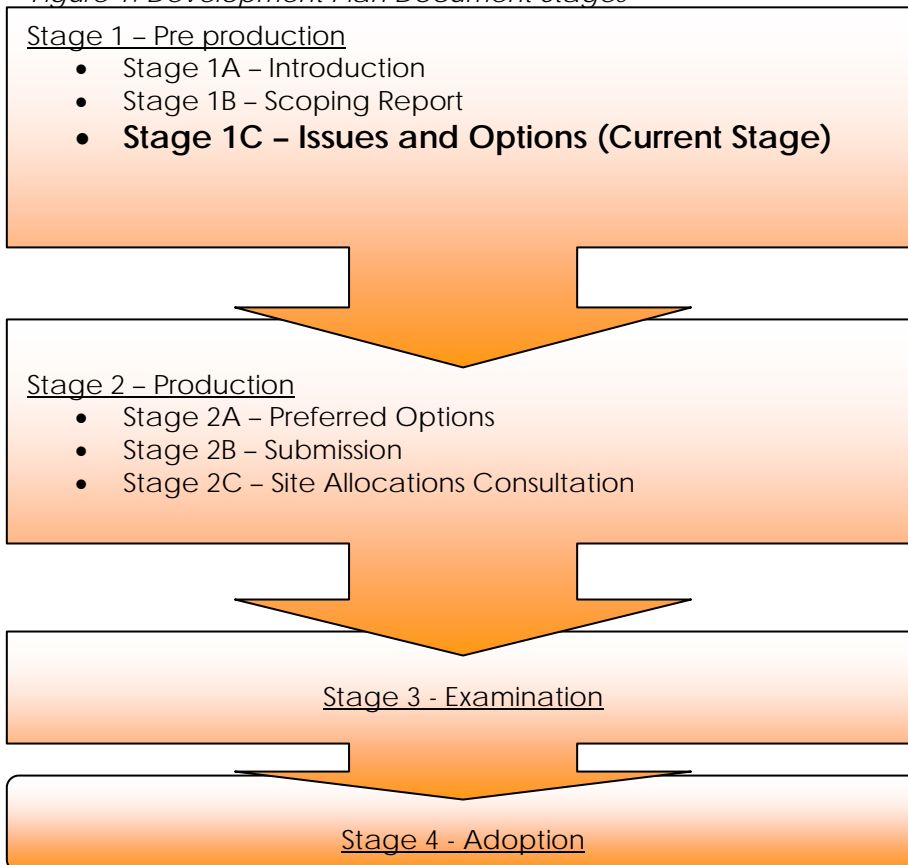
This report forms as a summary of the responses received from consultees during the public consultation period of the London Borough of Lewisham Local Development Framework Issues & Options Paper part 1, during 25th July – 12th September 2005.

A summary of the options together with a response questionnaire were provided to enable the public to understand what the prevailing issues in the borough are, present the options to remedy the issues in a straightforward manner and allow for a convenient way to respond.

This report has been prepared in conjunction with the Statement of Community Involvement whose purpose it is to explain and demonstrate to the public how the Council will carry out consultation on various issues including the Local Development Framework.

This stage represents Stage 1c (Pre- Production) of the Local Development Framework process as set out in the adopted Statement of Community Involvement. The Statement of Community Involvement explains how the community can be actively involved in planning in Lewisham and details how the community can make a change to places where they live, work and visit. The Issues and Options stage was the first stage in the preparation of the development plan documents, this is detailed in figure 1 below. The Issues and Options stage involved asking the community about what issues felt important to them and what direction they thought the local planning authority should adopt. Gathering facts and figures (known as the evidence base) helped the process by being able to rely on up to date and accurate information which has helped in developing the issues in the borough and the potential options to address the issues.

Figure 1. Development Plan Document Stages



Consultation Process

The Issues and Options papers cover ten (10) topics as set out below. The Council has consulted on these matters in four parts, to spread out the amount of information exhibited. The public consultation period for each of the Parts took place over a 6 week period, in accordance with Regulation 25 of the Planning & Compulsory Purchase Act (2004).

The topics covered and their consultation periods is as follows:

Part 1:

Consultation period: 25th July – 12th September 2005

- Housing
- Urban Design and Conservation
- Sustainable Environment
- Waste Management

Part 2:

Consultation period: 12th September 2005 – 24th October 2005

- Open Space and Biodiversity
- Employment
- Transport

Part 3:

Consultation period: 10th October – 21st November 2005

- Retail and Town Centres
- Site Allocations

Part 4:

Consultation period: 26th October – 30th November 2005

- Community Facilities, Health & Education

Methodology of Consultation

The Council undertook an extensive public consultation program that used all available medians to engage the public with the LDF Issues & Options. A total of 1400 individuals, groups, associations and government agencies and 'specific consultation bodies' were consulted during the process.

The contact list for the public consultation exercise was comprised of a list generated from the existing Unitary Development Plan in combination with a new list of consultees generated early in the LDF consultation process, along with any other consultees that responded to any of the LDF documents that were publicly exhibited prior the Issues and Options stage.

A list of the Specific Consultation Bodies that were consulted, as required by the Regulations is provided in Appendix 2. A list of all the General Consultation groups that were consulted has been provided in Appendix 3. These appendices can be found as separate documents.

The following medians were utilised during the public consultation process:

Internet:

The Council posted all the Issues & Options documents including questionnaires on the Council's website:

<http://www.lewisham.gov.uk/Environment/Planning/PlanningPolicy/LocalDevelopmentFramework/LDFConsultation/>

Telephone:

The Council provided four contact numbers to enable the general public to contact the Council's Planning Policy team throughout the public exhibition process.

Visitation:

The Council made available all the Issues and Options documents for public viewing at all the borough libraries and the Planning Information Office.

Diversity Case Study:

In 2005 Lewisham Council joined the international 'Intercultural City' project which was launched in 2004 by COMEDIA with core funding from the Roundtree Foundation. The Intercultural City is a project with case studies all over the world which seeks to better understand the value of cultural diversity and the benefits of cross cultural interaction in cities.

In September 2005 phase 1 of the Lewisham case study was undertaken with the aim of examining:

"...how local development studies and masterplanning techniques can be enhanced and developed in order to better meet the needs of an increasingly diverse community. This focus on masterplanning will also help to consider how Lewisham can make the most out of new development opportunities for the benefits of the wider and increasingly diverse community."

The work is due to be completed at the end of February 2007 and will be available on the Council website and hard copies made available.

Planning Focus Meetings:

The Council undertook planning focus meetings, specifically targeting 'active community groups' and 'hard to reach' groups. The planning focus meetings enabled the Councils

Policy Planners to engage with the public in an informal and interactive arrangement. The following meetings took place:

Group:	Date:
Deptford Business Forum	23 August 2005
Conservation and Amenity Groups	17 October 2005
Faith Groups	16 November 2005
Older People	21 October 2005
Ethnic Minorities	21 October 2005
Lewisham Disability Coalition	12 December 2005

Council officers also attended a meeting with the Mayor's Commission for Developing a Sustainable Environment on the 27th November 2006.

A summary of the comments provided in these meetings is provided in Appendix 1.

LDF Newsletter:

The Council produced two (2) Newsletters, providing the public with a summary and update on the Issues and Options stage of the Local Development Framework. The LDF Newsletter was sent out to all the consultees as discussed above.

Mail Drop:

A letter was sent to all the Specific Consultation Bodies, identified in Appendix 2 as well as the General Consultation groups, identified in Appendix 3.

Additionally, the Council wrote to 728 premises located within the Council's Defined Employment Areas under the Unitary Development Plan, informing that the Issues and Options papers for Employment Land and Site Allocations were available for review and comment.

The Council received a total of 521 responses during the public consultation process .

The following number of responses were received for each Part:

Part:	Number of Responses:
Part 1	66
Part 2	74
Part 3	349
Part 4	32
TOTAL	521

The responses can be split up into two categories; (A) Questionnaire responses, including responses from the Specific Consultation body submissions and (B) Written responses, forming the majority of the responses received.

SUMMARY OF QUESTIONNAIRE RESPONSES

The Responses received may have inaccurate readings, this is mainly due to uncompleted forms and respondents providing written responses as opposed to filling out the feedback consultation sheet. The policy direction will be explained further in the preferred options document.

HOUSING

Question 1: Have we addressed all the relevant issues?

Answer:	No. of Responses:
Yes	3
No	2

Question 2: What other issues have we not covered in relation to housing?

- *Where is site specific design for housing addressed? New housing adjacent. to Lee Station and along Lee High Rd is not site specific. Both present occupants with lack of prospect / privacy and exposure to noise, fumes and dust.*
- *Housing replacing outdated commercial areas/developments.*
- *Cumulative effects of development on essential: a) Infrastructure, b) open space, c) garden/backland developments, d) parking/traffic.*

Question 3: Have we proposed the most appropriate options?

Answer:	No. of Responses:
Yes	4
No	2

What are your views on the Options presented?

- *Options 7.1,7.2,7.3,7.4,7.5 are flexible enough to allow development to progress.*
- *How is 'self-build' categorised? Is it 'affordable housing' and if so which option would it fit?*
- *Issue 9.2.1: The overall objective on housing policy should be to bring in line essential infrastructure, community/amenity services. 10: Add provision of amenity space/garden for every unit of housing.*

URBAN DESIGN

Question 4: Have we addressed all the relevant issues?

Answer:	No. of Responses:
Yes	3
No	3

What other issues have we not covered in relation to urban design?

- *Need to stress riparian developments should not make Thames into a residential alleyway as has happened further upstream.*
- *Lack of training for Councillors.*
- *Density is a crude definition of numbers of people in a given location. UK policy achieves high density by adoption of reduced space standards. A higher standard of space for higher density should become policy.*
- *No mention or options proposed on amenity spaces / gardens for residential developments and their importance.*

- *Should give historic parks and gardens and other designed landscapes and open space their own issue number.*

Question 5: Have we proposed the most appropriate options?

Answer:	No. of Responses:
Yes	5
No	2

Question 6: What are your views on the Options presented?

- *Option 4.3 - There is a need to accept that there may be an increase in the number of high buildings. Option 4.4 - design quality must be a of a high standard.*
- *Should retain Option 5.1 and 6.1, Option 4.2 not 4.1 to protect riparian sites such as Convoy's Wharf.*
- *Options 6.2 + 6.3 + 6.4 should not be pursued. Do not see qualitative values for urban design addressed via; protection from wind, protection from noise, robust design, planting in scale*
- *Options 1.1, 1.2, 1.5 + 1.6 are too vague. Good principle but all encourage developers to put in applications for inappropriate, over-dense and over-high developments. Then LDF will be subject to interpretation of unspecified standards in their favour. 2.3 Integration of townscape with old buildings rather than other way round especially in special areas.*
- *Commend inclusion of Option 2.1*

SUSTAINABLE ENVIRONMENT

Question 7: Have we addressed all the relevant issues?

Answer:	No. of Responses:
Yes	4
No	1

What other issues have we not covered in relation to creating a sustainable environment?

- *Open Spaces.*
- *Backland Development.*

Question 8: Have we proposed the most appropriate options?

Answer:	No. of Responses:
Yes	3
No	1

Question 9: What are your views on the Options presented?

- *Not the indicators proposed in Option 1.3 or 4.2 or 6.2, support Option 3.6, Use both Options 7.1 and 7.2, Light and Noise are different pollutants and require separate categories.*
- *The use of the word 'encourage' is not strong enough.*

WASTE MANAGEMENT

Question 10: Have we addressed all the relevant issues?

Answer:	No. of Responses:
Yes	3
No	1

What other issues have we not covered in relation to waste management?

- *Should introduce recycling. i.e. In Greenwich*
- *Aesthetics. All waste collection arrangements in Lewisham are horrid. Probably because not thought through from central to local government.*

Question 11: Have we proposed the most appropriate options?

Answer:	No. of Responses:
Yes	3
No	1

What are your views on the Options presented?

- *Add Option 4.3.*
- *Management & design of waste system is not addressed.*

HOUSING

Issue 0: Provision of New homes and housing targets

Question 1: Which if any, of the proposed new housing target options do you support?

Preferred Option:	No. of Responses:
0.1 London Plan	7
0.2 Exceed London Plan	9

Issue 1: Housing mix and type

Question 2: Which of the proposed options do you think is most appropriate for dealing with housing mix and affordable housing issues?

Preferred Option:	No. of Responses:
1.1 Set preferred mix for affordable housing	6
1.2 Set preferred mix housing for all developments	3
1.3 Require mix only for sites over 60 dwellings or 2ha	6
1.4 No housing Policy	2

Other suggestions:

- *Combine Options 1.1 & 1.2.*
- *Offer scope to vary to preserve character / community balance of neighbourhood.*

Issue 2: Special Needs Accommodation

Question 3: Which of the proposed options do you think is most appropriate for dealing with special needs housing issues?

Preferred Option:	No. of Responses:
2.1 Encourage special needs	5
2.2 Encourage special needs housing but not so there is a concentration	10

Other suggestions:

- *Consider all development proposals in relation to their surroundings.*

Issue 3: Gypsy and Traveller Sites

Question 4: Do you agree with a criteria-based assessment for new gypsy sites?

Answer:	No. of Responses:

Yes	9
No	0

Other suggestions:

- *Criteria should be % change (increase or decrease) in the number of travellers nationally as an indicator or specific of need.*
- *Needs to be expanded to refer to assessment of need for additional provision and to refer to recent ODPM circular.*

Issue 5 & 6: Affordable Housing Thresholds & Contributions

Question 5: Which if any, of the options regarding affordable housing thresholds do you support?

Preferred Option:		No. of Responses:
5.1	Contributions where sites can provide more than 15 dwellings or >0.5 ha	11
5.2	Contributions on sites which can have >10 dwellings	6
5.3	Affordable housing contributions on all sites	1

Other suggestions:

- *Framework needs discussion on existing target housing densities.*
- *Additional option which sets a higher limit than 15 dwellings or 0.5 hectares.*
- *Option including sites with 2 or more units.*

Question 6: Do you agree with any of the options dealing with the amount of affordable housing contributions?

Preferred Option:		Number of Responses:
6.1	Negotiation starting point of 20% of all housing be affordable	4
6.2	Contribution starting point at 25%	5
6.3	Starting point of 50%	4
6.4	Starting point of 50% be affordable housing in large housing developments	4

Other Suggestions:

- *Policies for affordable housing should only set indicative targets.*
- *Council needs to set a borough wide Affordable Housing target consistent with the London Plan.*

Issue 7: Affordable housing, mixed and balanced communities and tenure

Question 7: Which option, if any, do you support to address issues associated with mixed communities and tenure balancing?

Preferred Option:		No. of Responses:
7.1	Affordable housing contribution of 70% social rented and 30% intermediate across the whole borough	2
7.2	Only intermediates affordable housing in areas with high social housing	3
7.3	Facilitate 'off site' social rented housing	0
7.4	Focus social rented housing in areas with currently low representation	1
7.5	Make decisions case by case	5
7.6	As part of intermediate contribution, seek key worker housing	1

Other Suggestions:

- *Consider in association with all local environmental factors.*

Issue 8: Lifetime Homes/Wheelchair Accessible Homes

Question 8: Which option do you think best deals with housing conversions?

Preferred Option:		No. of Responses:
8.1	Require all housing to meet lifetime home standards	3
8.2	Require all housing in major developments meet lifetime standards	2
8.3	Require 10% of all new housing be wheelchair accessible or easily adapted	5
8.4	Require 10% of housing in major developments be wheelchair accessible	6

Other Suggestions:

- *That the percentage(%) of all new housing be wheelchair accessible is based on the percentage (%) age of those needing this in Lewisham.*
- *Impractical to require houses to be accessible when surrounding areas are effectively inaccessible.*
- *Specialised developments that already provide for needs of residents should not have to provide further standards.*

Issue 9: Replacement of Housing Lost

Question 9: Which option do you think best deals with replacing housing lost to re-development?

Preferred Option:		No. of Responses:
9.1	Ensure loss is replaced at same density	5
9.2	Ensure loss is replaced at higher density	6
9.3	No requirement	3

Other Suggestions:

- *Combine Options 9.1 & 9.2 to create useful flexibility & to ensure housing stock is not diminished.*
- *In regards to Option 9.1 - Reference should be same or higher density, as appropriate and consistent with London Plan density guidance.*

Issue 10: Housing Conversions

Question10: Which option do you think best deals with housing conversion?

Preferred Option:		No. of Responses:
10.1	Allow conversions	1
10.2	Allow conversions for houses of 130m2 floor space or more	8
10.3	Require at least 1 family dwelling	4
10.4	Do not allow conversions	0

Other Suggestions:

- *Policy should clarify that it relates to conversions from existing residential buildings and not to conversion of buildings in other uses.*
- *The Core Strategy should include a density policy consistent with policy 4B.3 in London Plan, incorporating the density, location and parking matrix.*

URBAN DESIGN

Issue 1: Development in context

Question 1: Option U1 proposes that all new development should be at the highest density and intensity according to the nature of the surrounding development which would be identified by context studies. Do you support this option?

Answer:	No. of Responses:
Yes	8
No	7

Question 2: Do you think that Option U1 would successfully preserve the character of the borough by ensuring that development would be appropriate to its context – both in terms of style and density?

Answer:	No. of Responses:
Yes	8
No	7

Reasons – Yes:

- *Development should not always maximise use, since use of public space is crucial. Only support Option U2 if in combination with Option U1.*
- *Government guidance & regional policy is to increase the density of development through planning policy & high quality design. This should apply to all areas.*
- *Allows flexibility.*
- *Important to maximise densities if the growth objectives of the Borough are to be realised.*
- *Support Option U1 but requires a thorough study of Borough then would provide valuable input into development decisions - but costly to implement.*

Reasons – No:

- *Context of architectural quality & surrounding street scene should be strongly taken into account*
- *Maximising use of sites is subject to wide interpretation.*
- *Merge Options U1 & U2.*
- *Already over populated. No record of achievement.*
- *Concerned over high number of flat conversions.*

Question 3: Option U2 proposes that higher density development should take place in town centres only. Do you support this option?

Answer:	No. of Responses:
Yes	5
No	10

Question 4: Do you think that Option U2 would achieve the aim of sustainable development and the 'Compact City' just as well as Option U1?

Answer:	No. of Responses:
Yes	4
No	12

Issue 2: The Historic Environment

Question 5: Option U3 proposes the protection of the historic environment of the borough. The Council has a duty to continue to do this. Do you think that there are any special

elements of the borough's environment that should be protected and have any comments on the way the Council has carried out this duty in the past and suggestions for ways the wording of policies could be improved?

Comments:

- *Refer to historical public perceptions of how communities feel about their public spaces and buildings, to articulate development of them (see public space in Adelaide, South Australia).*
- *Agree with Option2.*
- *In Sydenham the Lawrie Park Triangle protection status together with a no. of roads in Lower Sydenham suggested over 10 years ago by Sydenham Society. No action so far by LBL. Also the Christmas Houses - Perry vale, Gaynesford, Church Rise, Sunderland Rd + South Rd should be considered for conservation status.*
- *Encourage sensitive modern infill.*
- *Policies should be drafted to preserve historic buildings of architectural merit.*
- *More planning consideration given to the Ladywell area next to St Mary's Conservation Area. Support for incorporating the Vicars Hill homes opposite Hilly Fields. Integration of townscape around older buildings instead of other way around.*
- *More areas of hills (e.g. the hill behind the Horniman could be further protected. However, the stated principles are good.*
- *Agree Council has a duty to protect the historic environment. Local implementation of planning policy is not working. Planning decisions are merely reducing the rate at which declines take place and, in some instances, actually assisting the decline. Council should seek to implement Article 4 directions to preserve Conservation Areas.*

Issue 3: River Thames and Frontage and the River Network

Question 6: The Council will continue to ensure that new development will respect and enhance the character of the River Thames and the Ravensbourne River/Deptford Creek Network. Do you have any new suggestions as to how to protect the river environment more successfully?

Comments:

- *Agree with Option.*
- *River frontage and views should be sensitively preserved.*
- *The creation of additional/extended water areas.*
- *Integration of townscape around older buildings instead of other way around.*

Question 7: The creation of long distance foot/cycle ways is one of the ways access to the river network will be improved. Do you have any suggestions for new long distance paths or changes or extensions to Waterlink Way?

Comments:

- *Footpaths should not be used by cyclists.*
- *Suggest using railway corridors to create direct cycle paths into central London*
- *Use section 106 to get funding to enhance and protect river environments from bank-side development.*

Issue 4: High Buildings

Question 11: Option U5, do you agree that well designed high buildings should be welcome in Lewisham if they are well located and compatible with the local context?

Answer:	No. of Responses:
Yes	10
No	3

Question 12: Option U6. Do you support this Option that directs high buildings to places such as Lewisham and Catford Town Centres?

Answer:	No. of Responses:
Yes	8
No	5

Other suggestions:

- *Better design and use of space.*
- *Combine options U5 & U6.*
- *Assess options on merits.*
- *Applications for high density buildings should go elsewhere.*

Question 13: Do you think that the suggested ways of judging the quality and appropriateness of high buildings are adequate?

Comments:

- *Supports Options. Should look at sustainability of energy use and make sure there are a range of uses.*
- *Provided that the criteria are applied consistently & in the light of London Plan Policy, the criteria appears adequate.*
- *Option U7 is inadequate. Strong policy based on Option U8 is necessary.*
- *The suggested ways of judging the quality and appropriateness of high buildings are vague. In residential areas, to be in context with the local area the height should follow the height of surrounding.*
- *Option U5 is adequate. Criteria should be flexible, whilst having regard to sensitive areas*
- *Yes - although more criteria seems needed for high density residential buildings.*
- *Yes - but there needs to be priorities set within the judging criteria.*

Issue 5: Views and Landmarks

Question 13: Option U9, Do you think we should be adding more views and landmarks to the list that is protected at the moment.

Answer:	No. of Responses:
Yes	5
No	6

Other suggestions:

- *MOL Land.*
- *Further protection could hinder the need for high quality, high density development.*
- *Wish to add Cobbs Corner as a landmark and key entrance / gateway to Borough. Supports vistas' protection including that encapsulated by Pissaro of Laurie Park Ave + St Barts, 'greenness' of Upper Sydenham + vista from top of Wells Park over Kent.*
- *North west view of London, centred on London Eye & BT Tower from Canonbie Rd.*
- *Views across Blackheath Mountsfield Park.*
- *Deptford Town Hall façade.*

Question 14: Do you think we should include some 'vistas' in the list of protected local views.

Answer:	No. of Responses:
Yes	5
No	5

Other suggestions:

- *The vistas of open (MOL Land) needs protecting.*
- *Vista encapsulated by Pissaro of Lanrie Park. Ave & St Barts needs protection. Vistas from Top of Wells Park over Kent needs acknowledgment.*

- *Should include vistas. Especially Greenwich from Thornville and Friendly St Deptford, Canary Wharf framed by Tyrwhitt, Brockley as seen from Hilly Fields Crescent, Tyrwhitt Rd Junction.*
- *Manor House Library through leafy glades of Manor House Gardens.*

Issue 6: Areas of Special Character

Question 14: Do you think we should continue to protect all the Areas of Special Character?

Answer:	No. of Responses:
Yes	9
No	1

Question 15: If not should we continue to protect Blackheath Area of Special Character?

Answer:	No. of Responses:
Yes	5
No	1

Question 16: Should we continue if not should we continue to protect Blackheath Area of Special Character?

Answer:	No. of Responses:
Yes	5
No	1

Question 17: Should we continue to protect the Sydenham Ridge Area of Special Character?

Answer:	No. of Responses:
Yes	4
No	1

Reasons:

- *Sydenham Ridge is the highest ridge in South London with panoramic views over London & Kent. This ridge needs full protection.*
- *Although Blackheath is covered by other designations, these do not specifically cover skylines and the promotion of traffic-free enclaves. Need more help.*
- *Blackheath & Thames seem to offer protections.*
- *Continue to protect all Areas. These areas are greatly valued as is reflected in house prices.*

Issue 7: Improving the image of the borough – reducing crime and the fear of crime – the inclusive and accessible environment

Question 18: The Council will be providing a set of general urban design policies intended to ensure that new development is sustainable, well designed and achieves the above objectives. The list is not final or exhaustive. Would you like to add to, improve or delete any of the policies?

Comments:

- *Encourage iconic architecture.*
- *Traffic needs to be addressed.*
- *Amend Appendix 2, Green Elements, 6th bullet point - to permit felling & loss of trees where existing trees impair the stability of existing buildings & free standing walls.*
- *New public space overlooked by homes, shops, etc.*
- *Wide and well lit road & footpath access for new developments.*

- *Concerned at apparent conflicts between policies in this document and with the 'housing' paper. Plans for 'mixed + balanced communities', lifetime home standards, disabled access to all properties etc could conflict with retaining the character of neighbourhoods uniformity of design. Also the evidence base in this paper needs to be expanded or deleted - inadequate as it stands.*
- *Re: stipulation of 'visual interest at ground floor level to promote a lively pedestrian environment', this is often interpreted as mixed-use in high-density residential development with retail or similar on ground floor. This leads to developments which are unable to let ground floor due to lack of demand, thus creating faceless facades (to the detriment of all). Any insistence of such an approach must respect market conditions as well as existing local business.*
- *Policy required to limit flat conversions. Policy required for urban design to seek to foster and preserve local communities.*

SUSTAINABLE ENVIRONMENT

Issue 1: Improving the use of energy

Question 1: Do you support the options proposed to support improved energy efficiency in Lewisham?

Answer:	No. of Responses:
Yes	10
No	1

Question 2: Do you agree with the assessment criteria for new developments in option 1.2?

Answer:	No. of Responses:
Yes	8
No	3

Question 3: Is there anything else the Council planning process can do to improve energy efficiency in existing and new buildings? If so please tell us:

Comments:

- *Make these options clear criteria for the consideration of planning committees.*
- *Provide information about sustainable energy.*
- *Option 1.2 is overly prescriptive and doesn't consider site characteristics precluding criteria. Could make development proposals unviable.*
- *Support Option 1.2 but too weak. Option 1.1 addresses climate change better. Council should be pro-active + set example. Also less out-of-town shops so less travel.*
- *Specify targets.*
- *Council planning process is limited in its capacity to achieve, given that it can only be applied to new development.*
- *Insist on heat pumps, some solar water pre-heat systems in new developments.*
- *Energy demand assessments should set out the likely baseline energy requirements for electricity, heating and cooling (rather than electricity and gas).*
- *A policy approach to require demonstration of consistency with a heating hierarchy should also be tied to a policy requiring the incorporation of energy efficient technology where feasible. This would give the necessary 'tool' to help implement the policy effectively, whilst allowing applicants the flexibility to demonstrate cost or technical limitations that may apply.*

Issue 2: Providing for renewable energy

Question 4: Do you support an increase in the use of renewable energy schemes within Lewisham?

Answer:	No. of Responses:
Yes	11
No	1

Question 5: Do you agree with the requirements placed on developers for incorporating renewables into new developments in options 2.1 & 2.2?

Answer:	No. of Responses:
Yes	6
No	7

Question 6: Which option should the Council pursue to require developers to incorporate renewables in developments (Option 2.1 or. 2.2):

Preferred Option:	No. of Responses:
10% hard-line	6
10% where feasible	6

Question 7: Option 2.3 proposes that the Council will support renewable schemes with a range of assessment criteria for varying types (i.e. wind turbines, solar panels).

Do you agree with these criteria? Can you offer any other ideas to assist planners in judging whether renewable energy schemes are suitable in your area? If so please tell us:

Answer:	No. of Responses:
Yes	9
No	0

Other suggestions:

- *Should encourage mixed use and zero-carbon simultaneously.*
- *Need to assess visual impact of equipment. It may not be suitable in all areas.*
- *Should involve schools and community centres to develop wind + solar schemes as a model.*
- *The policy needs to address the Council's attitude to renewable nuclear energy.*
- *Threshold be increased to schemes of 50 units or more.*

Issue 3: Flood risk & climate change, sustainable drainage

Question 8: Are you aware that there is small risk of river and tidal flooding in Lewisham (1 in 100 year and 1 in 200 year risk)?

Answer:	No. of Responses:
Yes	8
Had an idea	2
No, not at all	0

Question 9: Do you think the Council should take a pro-active approach to preparing for the risks associated with climate change?

Answer:	No. of Responses:
Yes, most definitely	6
Yes, but no priority	2
No	1

Question 10: Do you think we have proposed the best options to deal with flood hazards and climate change?

Answer:	No. of Responses:
Yes	7
No	1

Other suggestions:

- *Add green/brown proofs.*
- *Development can have a significant impact on flooding simply by increasing run-off.*
- *Changes of use on previously developed land can also have significant downstream impacts.*
- *Locally, flooding may occur due to groundwater overflowing, overland sheet flow or run-off exceeding the capacity of piped drainage during periods of heavy or prolonged rainfall.*

Issue 4: Air quality

Question 11: To what extent do you find air pollution to be a problem in Lewisham?

Answer:	No. of Responses:
Big problem	5
Minor problem	4
Not a problem	0

Question 12: Do you think we have proposed the best options to deal with air quality?

Answer:	No. of Responses:
Yes	6
No	2

Other suggestions:

- *All council vehicles should be electric powered. Poor air quality is directly related to excessive & inefficient traffic management.*
- *Support options but should avoid giving planning permission for out-of-centre developments (e.g. Bell Green) which will increase vehicular transport.*
- *Specify targets.*
- *Ban diesel engines.*
- *Support new policies which require drivers of stationary vehicles to switch off engines;*
- *Policies to promote cleaner technology and alternative fuels as a mechanism to reduce overall emissions, particularly with respect to delivery and freight road vehicles;*
- *Measures to encourage the use of alternative transportation modes, such as supporting sustainable transportation networks, implementing a parking strategy and encourage the development of Travel Plans;*
- *Wide ranging measures to reduce emissions overall, such as the introduction of a London Low Emission Zone and vehicle emission testing schemes;*
- *Measures to manage traffic demand and traffic levels, and measures to reduce vehicle speeds and thereby reduce emissions.*

Issue 5: Contaminate land / Hazardous substances

Question 13: Do you think we have proposed the best options to deal with contaminated land & hazardous substances this?

Answer:	No. of Responses:
Yes	9
No	0

Other suggestions:
No response.

Issue 6: Water quality, resources and infrastructure

Question 14: What do you think of the standard of the river water quality in Lewisham?

Answer:	No. of Responses:
Very poor	0
Quite poor	1
Neutral	3
Good	0
Great	2

Question 15: Do you think the Council should take a pro-active approach to ensure the sustainability of water resources?

Answer:	No. of Responses:
Yes, most definitely	5
Yes, but no priority	4
No	1

Question 16: Do you think we have proposed the best options to do this?

Answer:	No. of Responses:
Yes	6
No	3

Other suggestions:

- *Encourage public school education opposition for water conservation to avoid clean water going to sewers.*
- *Take account of paving front gardens & increasing stormwater runoff.*
- *Assessment of standard water quality should not be limited to rivers alone. The water framework directive is a major opportunity to improve the whole water environment and promote the sustainable use of water.*

Issue 7: Noise and light effects

Question 17: To what extent do you find noise to be a problem for you in Lewisham?

Answer:	No. of Responses:
Big problem	3
Minor problem	4
Not a problem	1

Question 18: If noise is a problem for your household in Lewisham, where is it coming from?

Answer:	No. of Responses:
Noisy neighbours	3
Traffic	3
Rail	3
Business operations	1

Other suggestions:

- *Aircraft noise*

- *Car stereos*

Question 19: Do you think we have proposed the best options to deal with noise and light effects?

Answer:	No. of Responses:
Yes	1
No	3

Other suggestions:

- *Dimming*
- *Light pollution*

Issue 9: Sustainable use of building materials and aggregates

Question 20: Do you think we have proposed the best options to deal with the sustainable use of building materials and aggregates?

Answer:	No. of Responses:
Yes	5
No	3

Other suggestions:

- *Should encourage or specify more locally resourced materials at an appropriate percentage.*
- *Recycled materials.*
- *Use recycled aggregates as much as possible.*
- *EA would like to see a dramatic increase in sustainable construction. Most local authorities seem to be using BREAM and ECOhomes standard targets, which is specifically for sustainable construction techniques.*

WASTE

Issue 1: Waste reduction

Question 1: Do you support the option proposed to encourage minimising waste generation and increased recycling in Lewisham?

Answer:	No. of Responses:
Yes	8
No	0

Question 2: Do you agree with option 1.1 for planners to consider how waste reduction and recycling are incorporated into planning applications for developments?

Answer:	No. of Responses:
Yes, most definitely	5
Yes, but no priority	5
No	1

Question 3: Is there anything else the Council planning process can do to reduce waste generation and increase recycling? If so please tell us:

Comments:

- *Develop site for commercial composting.*

- *Planning/Building control should favour local recycling of grey/rain water.*
- *Council planning process cannot do much more, but Council needs to educate & encourage individuals to recycle & reduce the waste they generate.*

Issue 2: Provision of new waste management sites

Question 4: If the Council pursues the establishment of another waste management site (refuse and recycling centre) where should it be located?

Preferred Option:	No. of Responses:
2.1: In the north of the Borough only (near SELCHP)	1
2.2: In any preferred employment areas, including South – Bromley Rd	4
2.3: In any preferred employment areas, including North – Convoy's Wharf	0

Other suggestions:

Question 5: Do you agree with the criteria proposed in option 2.3 for the assessment of new waste management facilities?

Answer:	No. of Responses:
Yes	4
No	2

Other suggestions:

- *Sites of nature conservation should not be suitable.*
- *A site on publicly owned land should be identified. Preferred employment locations in private ownership should be protected for employment or mixed uses.*
- *Should avoid new additional waste management facility.*

Question 6: Option 2.4 proposes that the Council will encourage new recycling 'bring points' in key service areas (near supermarkets, schools etc) and recycling storage in new developments. Do you agree with this option?

Answer:	No. of Responses:
Yes	5
No	2

Question 7: Is there anything else that you want the planning process to consider when encouraging these provisions in the borough (i.e. appearance, sitting, health & safety?) If so please tell us:

Issue 3: Protection of existing waste management sites

Question 8: Options 3.1 and 3.2 encourage the retention of established waste management sites? Which option do you prefer?

Answer:	No. of Responses:
Retain Council waste sites only (3.1)	1
Retain Council and private waste sites (3.2)	6
Don't retain any waste management sites	0

Question 9: Do you think we have proposed the best options to deal with retention of waste management sites?

Answer:	No. of Responses:
Yes	3
No	1

Other suggestions:

- *Why bring points - When green boxes/kerb-side collection is the focus?*
- *Encourage private waste management.*
- *Take a local initiative.*

Issue 4: Standards for waste storage and recycling facilities

Question 11: Options 4.1 and 4.2 propose requirements for new developments to incorporate waste storage and recycling facilities. Which option do you think the Council should require?

Answer:	No. of Responses:
Require in developments 5 units or more (4.1)	4
Require in developments 15 units or more (4.2)	2
Don't require any waste storage and recycling facilities	1

Other suggestions:

- *The need for refuse facilities is most processing in flatted developments. The Draft policy should reflect this.*
- *5+ Units or more*
- *Schemes in excess of 50 units*

Question 12: Options 4.1, 4.2, 4.3 propose criteria to determine how waste storage facilities should be incorporated into developments and commercial operations. Do you think we have proposed the best options?

Answer:	No. of Responses:
Yes	5
No	1

Other suggestions:

Every development should provide waste storage.

Written Responses (only summary of main points) & Officer recommendations

Part 1

- Housing
- Urban Design and Conservation
- Sustainable Environment
- Waste Management

Part 1

HOUSING

LIST OF RESPONDENTS FOR **HOUSING** ISSUES AND OPTIONS CONSULTATION

RESPONDENTS IDENTIFICATION NUMBER	RESPONDENT
6	Anonymous
10	Grove Park Community Group, 268 Baring Road
14	James Amos, Hephher Dixon
21	Peter Dean, The Blackheath Society
24	RG Pickett, Diocese of Southwark
25	Phillip Thompson, The Planning Bureau
26	Anonymous
32	Donna Carr, Public Health Programmes Manager, Director of Public Health,
34	Anonymous
36	Andrew Reid, on behalf of Tewkesbury Lodge Estate
43	Mondgezi Ndlela, RPS Planning on behalf of Fairview New Homes
45	Mondgezi Ndlela, RPS Planning on behalf of Fairview New Homes
55	Paula Carney, RPS Planning
56	Jonathan Sheldon, Home Builders Federation
57	Susan Gore, Ladywell Society
58	Susan Gore, Ladywell Society
60	Giles Dolphin, Greater London Authority, Policy & Partnerships Directorate
61	Peter Richardson, The Users & Friends of Manor House Library
63	Paul Woods, Paragon Planning
64/66	MG Bacchus, Telegraph Hill Society

Schedule of Representations

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
10		Grove Park Community Group	Empty Homes	Agree that those landlords/owners with empty properties should be encouraged to bring them back into residential use.	Agree. As part of the Borough's housing target set by the London Plan, a target for vacant housing has been included.	Preferred option will be drafted to reflect this aspiration and requirement.
14	James Amos	Hepher Dixon	Comments	Support the draft housing policies but encourage the Council to take note of the London Plan housing targets which encourages Councils exceed the targets set for housing development.	Housing targets are set by the regional plan, in this case the London Plan. The targets are not a ceiling and can be exceeded.	Preferred option will be drafted to reflect this aspiration and requirement.
14	James Amos	Hepher Dixon	Comments	With regard to housing mix, it is our view that this should, on smaller sites, be left to the developer in the case of private development, or Housing Association, in the case of affordable housing, to determine the mix of sites. On larger sites, where there is a need to balance the mix of development to create balanced communities, general criteria should be set out to guide development in an appropriate form.	Noted. Government guidance supports housing mix policies. Setting a mix for affordable housing is supported while a mix for market housing should be determined by the market except for large scale proposals.	Preferred options will be drafted in accordance with national and regional policy guidance for housing.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
14	James Amos	Hepher Dixon	Issue 1: Housing Mix and Type	On smaller sites, housing mix should be determined by the developer on private developments or by the RSL for affordable housing schemes.	Noted. Government guidance supports housing mix policies. Setting a mix for affordable housing is supported while a mix for market housing should be determined by the market except for large scale proposals.	Preferred options will be drafted in accordance with national and regional policy guidance for housing.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
14	James Amos	Hepher Dixon	Issue 7: Affordable Housing, Mixed & Balanced Communities & Tenure	In regards to Issue 7 – the options provided are unacceptable. It is recognised that Affordable housing is required, albeit in varying proportions through the Borough, depending on site location and surrounding tenures. The existing UDP policies provide a degree of flexibility for varying the proportions of socially rented housing and intermediate housing, and it is our view that this approach should be followed again. Key worker housing should also be required as part of the intermediate contribution, particularly in locations with good accessibility to public transport (e.g. town centres).	Disagree. The preferred option will be used as the starting point for negotiations for the delivery of affordable housing. This will usually include an element of key worker housing, which is now included under the 'intermediate' housing definition. The options put forward seek to reflect national and regional policy and guidance.	The preferred option will be drafted to reflect national and regional policy and guidance and to retain flexibility in implementation where appropriate.
21	Peter Dean	Blackheath Society	Issue 10: Housing Conversions	Policy should clarify that it relates to conversions from existing residential buildings and not to conversion of buildings in other uses.	Agree.	Preferred option will be worded to clarify intent.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
24	RG Pickett	Diocese of Southwark	Issue 5 & 6: Affordable Housing Thresholds & Contributions	Lower figure will greatly assist with supply of housing need and will help to create balanced communities and minimise creation of 'ghettos'.	Agree. A lower figure will be pursued due to a range of local factors including the lower price of land.	Preferred option will seek 35% affordable housing.
24	RG Pickett	Diocese of Southwark	Issue 9: Replacement of Housing Lost	Combine 9.1 and 9.2 to create useful flexibility and to ensure housing stock is not diminished.	Noted.	Preferred option will be drafted to ensure redevelopment replaces housing at the same or higher density.
25	Phillip Thompson	The Planning Bureau	Issue 5 & 6: Affordable Housing Thresholds & Contributions	Important that the provision of affordable housing does not compromise on authorities ability to provide for other housing needs i.e. elderly.	Noted. A range of housing is needed and affordable housing provision should not impact on the provision of other specialist housing types.	Preferred options will be drafted to reflect this aspiration and in accordance with national and regional policy and guidance.
25	Phillip Thompson	The Planning Bureau	Issue 8: Lifetime Homes/Wheelchair Accessible Homes	Specialised developments that already provide for needs of residents should not have to provide further standard i.e. sheltered housing , special design already included in building.	Agree. The standards for lifetime homes apply to all housing and where this is provided as part of a specialised housing development, additional standards will not be required.	The preferred option will be drafted to clarify its intent, especially the policy's implementation.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
26	Anonymous		Q1 (Other Issues)	Where is site specific design for housing addressed?	Specific design criteria is included under the Urban Design section of the LDF.	Preferred options for urban design issues will include site specific requirements. Detailed design standards are contained in the recently adopted LDFs Residential Standards SPD.
26	Anonymous		Q3 (Views)	How is 'self-build' categorised? Is it 'affordable housing' and if so which option would it fit?	To be classified as affordable housing it would need to be in accordance with the definition as provided in national policy guidance. Self-build could fall into this category although this would usually be the exception and not the rule.	N/A

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
32	Donna Carr	Public Health Programmes Manager, Director of Public Health,	Main Issues Raised	<p>We are surprised at the limited definition of issues as set out in these papers. The housing issue is expressed as being about numbers, affordability and tenure. We suggest that you also need to think about:</p> <p>(1) The numbers of houses and new demand for facilities, (2) Where and when that demand will arise, (3) Nature and size of housing - social and family generates more needs than public housing, (4) Relationship of new housing to existing residential areas and the pattern of health provision. If existing is poor then it will be exacerbated. Assessment of capacity will be relevant together with your forward capital programme, (5) Need for key worker housing for health service employees.</p>	<p>The issues covered in the paper were limited to those related to housing. However the issues raised in the representation are dealt with when all the Issues and Options Papers are considered collectively and the LDFs spatial strategy is established. The spatial strategy will establish key development areas/localities and consequently where additional facilities and services will need to be located. Many of the service shortfalls can be dealt with through planning obligations. Key worker housing will be a component of the affordable housing requirements.</p>	<p>The issues raised will be considered collectively, especially when preparing the spatial strategy, and preferred options prepared to meet these key objectives.</p>
34	Anonymous		Q1 (Other Issues)	<p>Housing replacing outdated commercial areas/developments.</p>	<p>Agree. Where appropriate, housing can be used as a lever to facilitate the Borough's regeneration.</p>	<p>The preferred options will reflect this important issue which contributes positively to the Borough's regeneration.</p>

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
36	Andrew Reid	Tewkesbury Lodge Estate	Issue 0: Provision of New Homes and Housing Target	Targets may not be achievable without major improvement to transport facilities/roads etc. Plus community support - doctors, schools, hospitals, police etc. No point in cramming people in without facilities.	Housing targets are set by the regional plan, in this case the London Plan. LBL is obliged to meet and exceed the target set. The cumulative effects of development are considered from the outset as part of the LDF - including the need to ensure the additional demand from new development can be met. Additional funding/works for the additional demand can be secured through planning obligations.	Preferred options will be drafted to reflect this aspiration and in accordance with national and regional policy and guidance. The use of planning obligations will also be included.
36	Andrew Reid	Tewkesbury Lodge Estate	Issue 1: Housing Mix & Type	Offer scope to vary to preserve character / community balance of neighbourhood	Agree. Mixed and balanced communities is a key objective for the LDF. Local character issues will be included as part of the preferred options for urban design.	The preferred options will cover the issue of mixed and balanced communities, while the other matters raised will be considered as part of the preferred options for Urban Design.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
36	Andrew Reid	Tewkesbury Lodge Estate	Issue 2: Special Needs Accommodation	All development proposals should be considered in relation to their surroundings so as to maintain the character/harmony of neighbourhoods.	Noted. This comment reflects current assessment of planning applications.	The matters raised will be considered as part of the preferred options for Urban Design.
36	Andrew Reid	Tewkesbury Lodge Estate	Issue 5 & 6: Affordable Housing Thresholds & Contributions	Framework needs discussion on existing target housing densities. It will be difficult to make all plans consistent whilst surveys show that 100% of new development needs to be 'affordable'.	Housing targets are set by the regional plan, in this case the London Plan. Housing affordability is a big issue. Preferred options will seek to deliver affordable housing in line with national and regional policy and guidance and local circumstances. The target for affordable housing is the starting point for negotiations.	Preferred option will be drafted in accordance with national and regional policy and guidance, and in response to local circumstances.
36	Andrew Reid	Tewkesbury Lodge Estate	Issue 7: Affordable Housing, Mixed & Balanced Communities & Tenure	Important to consider the requirement in association with all local environmental factors.	Noted.	The preferred options will cover the issue of mixed and balanced communities and drafted in accordance with national and regional policy and guidance, and in response to local circumstances.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
36	Andrew Reid	Tewkesbury Lodge Estate	Issue 8: Lifetime Homes/Wheelchair Accessible Homes	Impractical or pointless to make houses accessible if surroundings are effectively impassable to wheelchairs.	Noted. Accessibility and equality is a key issue and theme for the LDF. Council has corporate targets to improve accessibility throughout the public realm.	Preferred option will reflect accessibility objectives and national and regional policy and guidance on this matter.
36	Andrew Reid	Tewkesbury Lodge Estate	Issue 9: Replacement of Housing Lost	Preserve character of neighbourhood when replacing lost housing.	Agree. Preferred options relating to design and context of development as covered in the urban design section, can ensure replacement housing retains the character of an area.	Preferred options relating to the context and density of development can ensure the character of an area is retained. This will generally be reflected in the urban design preferred options.
36	Andrew Reid	Tewkesbury Lodge Estate	Issue 10: Housing Conversions	Generally desirable to preserve family dwellings and to ensure that any proposed conversions do not detract from existing balance of community.	The preferred options will seek to deliver a range of housing types and sizes, including family dwellings. The retention of daily dwellings is a key Council objective contributing towards mixed and balanced communities.	Family dwellings will need to be provided as part of a conversion.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
43	Mondgezi Ndlela	RPS Planning	Issue1: Housing Mix and Type	<p>We would support option 1.4 which is to have no housing mix policy. The policy of housing mix needs to be applied flexibly on a case by case basis. Some sites will be much better suited physically and locationally to certain types of housing such as single person housing where as others may be better suited for families. To try and impose a mix on every site, particularly small sites could lead to bad planning in terms of (1) design with different residential formats being crammed onto one site; (2) in the use of local facilities which would be for different types of households and (3) in terms of good neighbourliness. If this is not accepted then the second preference we would support would be option 1.3 which would meet many of the above criticism. Option 1.3 allows a broad balance to be aimed at across the Borough.</p>	<p>Government guidance supports housing mix policies. Setting a mix for affordable housing is supported while a mix for market housing should be determined by the market except for large scale proposals.</p>	<p>Preferred options will be drafted in accordance with national and regional policy guidance for housing. A mix for affordable housing will be established and criteria set out on matters to consider for market housing mix.</p>

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
43	Mondgezi Ndlela	RPS Planning on behalf of Fairview New Homes	Issue 5 & 6: Affordable Housing Thresholds & Contributions	Fairview New Homes strongly object to options 5.2 which seek a contribution to Affordable Housing on sites capable of providing more than 10 dwellings. The proposed threshold is contrary to government guidance C6/98.	PPS3 supports this option and supersedes C6/98. Draft Alterations to the London Plan propose a threshold for affordable housing of 10 dwellings. This option seeks to provide a higher level of affordable housing than what currently exists. It is felt that this will contribute to meeting the demand for affordable housing in the Borough.	Preferred option will be drafted in accordance with national and regional policy and guidance, and in response to local circumstances.
43	Mondgezi Ndlela	RPS Planning on behalf of Fairview New Homes	Issue 5 & 6: Affordable Housing Thresholds & Contributions	Fairview New Homes strongly object to options 5.3 which seek a contribution to Affordable Housing on all residential sites. This is wholly contrary to Circular 6/98.	Circular 6/98 has been superseded by PPS3.	Preferred option will be drafted in accordance with national and regional policy and guidance, and in response to local circumstances.
43	Mondgezi Ndlela	RPS Planning on behalf of Fairview New Homes	Issue 5 & 6: Affordable Housing Thresholds & Contributions	Additional option which sets a higher limit than 15 dwellings or 0.5 hectares.	Not supported. Contrary to national and regional policy guidance, especially PPS3 and the London Plan.	Preferred option will be drafted in accordance with national and regional policy and guidance, and in response to local circumstances.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
45	Mondgezi Ndlela	RPS Planning on behalf of Fairview New Homes	Issue 5 & 6: Affordable Housing Thresholds & Contributions	Fairview New Homes object to Options 6.1, 6.2, 6.3 and 6.4 to provide a percentage contribution of affordable housing. This is unjustified and unacceptable as Circular 6/98 clearly states that policies for affordable housing should set 'indicative' targets for specific sites.	Circular 6/98 has been superseded by PPS3. Government guidance seeks the provision of affordable housing. The London Plan provides a figure of 50% affordable housing from all sources. There is a need for the local development plan to be in conformity with the regional plan.	The preferred option will set a target for affordable housing. This will be the starting point for negotiations. The preferred option will be drafted in accordance with national and regional policy and guidance, and in response to local circumstances.
55	Paula Carney	RPS Planning	Issue 0: Provision of New Homes and Housing Target	The LDF should ensure that the London Plan targets are met, but this should not be seen as a ceiling. Where there are opportunities for additional housing, through making more efficient use of urban land, bringing forward regeneration benefits and creating exciting new communities, these should be taken.	Agree. Land available for development will be identified and the Council does not see the housing target as a ceiling.	Preferred option will be drafted to reflect this aim and in response to local circumstances.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
55	Paula Carney	RPS Planning	Issue 5 & 6: Affordable Housing Thresholds & Contributions	The threshold for the provision of affordable housing should be consistent with Government policy guidance and the London Plan. The threshold for the provision of affordable housing in the London Borough of Lewisham should not be lower than 15 dwellings or 0.5 hectares.	PPS3 supports a lower threshold. Draft Alterations to the London Plan propose a threshold for affordable housing of 10 dwellings. This option seeks to provide a higher level of affordable housing than what currently exists. It is felt that this will contribute to meeting the demand for affordable housing in the Borough.	Preferred option will be drafted in accordance with national and regional policy and guidance, and in response to local circumstances.
55	Paula Carney	RPS Planning	Issue 5 & 6: Affordable Housing Thresholds & Contributions	The amount of affordable housing that should be sought on sites above the relevant thresholds should be chosen to have regard to the availability of public subsidy in the Borough, and the need to ensure balanced communities. Where public subsidy is limited, the amount of affordable housing sought should be lower.	An assessment of affordable housing provision is made irrespective of public subsidy.	Preferred option will be drafted in accordance with national and regional policy and guidance, and in response to local circumstances.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
55	Paula Carney	RPS Planning	Issue 5 & 6: Affordable Housing Thresholds & Contributions	It is often a misconception that larger housing developments can provide additional amounts of affordable housing. Schemes on the larger sites often need to make significant contributions to transport improvements and other infrastructure. Larger schemes should therefore not provide a higher proportion of affordable housing as a matter of course.	Thresholds are used as a starting point for negotiations. The full range of planning obligation matters will be considered for each application and this includes affordable housing.	Preferred option will be drafted in accordance with national and regional policy and guidance, and in response to local circumstances.
55	Paula Carney	RPS Planning	Issue 5 & 6: Affordable Housing Thresholds & Contributions	The tenure of affordable housing should not be a prescriptive approach. Policies should be flexible to enable decisions to be made on a case by case basis, whilst having regard to the need to create a mix in affordable housing to meet the needs across the Borough as a whole, and having regard to the guidance mix in the London Plan.	Tenure figures will be provided to ensure mixed and balanced communities. It is up to an applicant to show why this should be changed and this will be assessed on the merits of the application.	Tenure will generally be prescribed by the Council however this could be negotiated subject to local site circumstances and the merits of the application.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
56	Jonathon Sheldon	Home Builders Federation	Issue 0: Provision of New Homes and Housing Target	Support Option 0.2 - given the high level of need/demand across London, the Council should aim to exceed the London Plan target. The target should act as a 'floor' rather than a 'ceiling' for development.	Housing targets are set by the regional plan, in this case the London Plan. The targets are not a ceiling and can be exceeded.	Preferred option will be drafted to reflect this aspiration and requirement.
56	Jonathon Sheldon	Home Builders Federation	Issue 1: Housing Mix and Type	Support Option 1.1 - HBF are not adverse to instances, where public grant is involved, that the Council sets a preferred mix aimed at addressing need in the affordable housing sector, and ensuring public money is optimised. However HBF are vehemently against any attempts to prescribe a preferred mix for market housing. Any insistence on a preferred mix of affordable housing needs to respect the site specifics and nature of the proposed scheme.	Government guidance supports housing mix policies. Setting a mix for affordable housing is supported while a mix for market housing should be determined by the market except for large scale proposals.	Preferred options will be drafted in accordance with national and regional policy guidance for housing. A mix for affordable housing will be established and criteria set out on matters to consider for market housing mix.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
56	Jonathon Sheldon	Home Builders Federation	Issue 2: Special Needs Accommodation	Support Option 2.1 - It is important that the borough encourages special needs housing to address demand and manage existing stock, for instance elderly people can free up their larger dwellings and move to more suitable solutions.	Noted.	The preferred option will support and encourage special needs housing.
56	Jonathon Sheldon	Home Builders Federation	Issue 5: Affordable Housing Threshold	Support Option 5.1.	Noted.	Preferred options will be drafted in accordance with national and regional policy guidance for affordable housing and local circumstances.
56	Jonathon Sheldon	Home Builders Federation	Issue 6: Affordable Housing Percentage	Support Option 6.2 - seek a contribution of 35%. This issue was addressed last year when the UDP was adopted and represents a pragmatic approach. The 50% target in the London Plan is a strategic target from all sources, not just new build.	Agree. The Council see 35% as realistic and achievable. This figure responds to local circumstances.	The preferred option will seek 35%.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
56	Jonathon Sheldon	Home Builders Federation	Issue 7: Affordable Housing Tenure	Support Option 7.5 - Make decisions case by case. There is no fixed definition of a 'mixed and balanced' community and there are a number of factors that will influence the tenure split, including the existing tenure of the surrounding area, availability of public subsidy and the costs incurred by the developer.	Noted. The preferred options will reflect the desire to see mixed and balanced communities. Any figure proposed will be the starting point for negotiations.	Preferred options will be drafted in accordance with national and regional policy guidance for mixed and balanced communities and local circumstances.
56	Jonathon Sheldon	Home Builders Federation	Issue 8: Lifetime Homes/Wheelchair Accessible Homes	Support Option 8.4 - Require 10% of housing in major developments to be wheelchair accessible. It is welcome that the Council recognises that there are additional costs involved in the provision of Lifetime and Wheelchair accessible homes. The concept of Lifetime Homes will be examined within the next review of Part M of the Building Regulations, which will clear up this rather 'grey area' of planning policy.	Noted.	The preferred option will ensure the provision of Lifetime Homes.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
56	Jonathon Sheldon	Home Builders Federation	Issue 9: Replacement of Housing Lost	Support Option 9.1 - Ensure loss is replaced at same density. Replacement should be at the same density, at least, however replacement at higher densities should not be precluded if the area is suitable/sustainable in terms of PTAL etc.	Noted.	Preferred option will be drafted to ensure redevelopment replaces housing at the same or higher density.
57	Susan Gore	Ladywell Society	Q1 (Other Issues)	Cumulative effects of development on essential: a) Infrastructure, b) open space, c) garden/backland developments, d) parking/traffic.	Cumulative effects of development are considered from the outset as part of the LDF - including the need to ensure effective service delivery. Additional funding/works for the additional demand a development creates can be secured through planning obligations and working effectively with service providers.	Each preferred option for the LDF will consider this issue and will be reflected through the spatial vision, objectives and strategy of the Spatial (Core) Strategy.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
57	Susan Gore	Ladywell Society	Q3 (Views)	Issue 9.2.1: The overall objective on housing policy should be to bring in line essential infrastructure, community/amenity services.	Agree. Additional funding/works for the additional demand a development creates can be secured through planning obligations and working effectively with service providers.	Each preferred option for the LDF will consider this issue and will be reflected through the spatial vision, objectives and strategy of the Spatial (Core) Strategy.
57	Susan Gore	Ladywell Society	Q3 (Views)	10: Add provision of amenity space/garden for every unit of housing.	Agree. This is generally covered in the Urban Design issues and options. Specific amenity space guidelines are provided in the LDFs Residential Standards SPD.	This objective will be reflected through the preferred options, while detailed guidelines are contained in a SPD.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
58	Susan Gore	Ladywell Society	Issue 0: Provision of new homes and housing target	Ladywell Society does not agree with any housing targets unless there is a specific statement that essential infrastructure will be brought in line with current housing levels (and with open spaces and amenity spaces per unit) maintained to meet the cumulative requirements of Lewisham housing levels.	Housing targets are set by the regional plan, in this case the London Plan. The cumulative effects of development are considered from the outset as part of the LDF - including the need to ensure additional infrastructure is provided. This will be sought through appropriate planning obligations and working with relevant partners to ensure provision.	Each preferred option for the LDF will consider this issue and will be reflected through the spatial vision, objectives and strategy of the Spatial (Core) Strategy.
58	Susan Gore	Ladywell Society	Issue 1: Housing Mix & Type	Options 1.1 and 1.2 should be combined. In fact wording does not make clear or balance the intentions of the options.	Noted. Guidance recommends a mix for affordable housing is set, while market housing should be provided in accordance with specified criteria.	Preferred option will be drafted in accordance with national and regional policy and guidance, and in response to local circumstances - having regard to housing need.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
58	Susan Gore	Ladywell Society	Issue 3: Gypsy & Traveller Sites	One criteria should be % change (increase or decrease) in the number of travellers nationally as an indicator or specific of need. Currently the present site seems appropriate.	A regional needs study is currently being undertaken on behalf of London Borough's by the GLA. In the meantime, the policy guidance from Circular 01/06 will be followed.	Preferred option will be drafted in accordance with national and regional policy guidance and evidence.
58	Susan Gore	Ladywell Society	Issue 5 & 6: Affordable Housing Thresholds & Contributions	Another option should be provision on sites with 2 or more units (which fits the London Plan criteria of 50% affordable housing in new developments).	Disagree. Providing affordable housing on sites of 2 or more units would not be economically viable and could negatively impact on housing provision. The London Plan figure is a strategic target from all sources of housing not just new build.	Preferred option will be drafted in accordance with national and regional policy guidance and local circumstances.
58	Susan Gore	Ladywell Society	Issue 8: Lifetime Homes/Wheelchair Accessible Homes	A) That the % of all new housing be wheelchair accessible is based on the % age of those needing this in Lewisham. B) Require 10% of all new housing to be wheelchair accessible.	Housing Needs Study would provide information on the % requiring such housing. The Council will prepare an update Housing Needs Study in 2007.	The preferred option will ensure the provision of Lifetime Homes.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
6	Anonymous		Q3 (Views)	Options 7.1, 7.2, 7.3, 7.4, 7.5 are flexible enough to allow development to progress.	Noted.	Preferred options will be drafted in accordance with national and regional policy guidance and local circumstances.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Housing targets general	Reference should be made to the proposed new target for Lewisham in the draft London Plan alterations of 1,080 homes a year.	Noted.	The final figure adopted as part of the London Plan alterations will be used.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 0: Provision of new homes and housing target	Option 0.1 is preferred as the target for new housing will be based on new London Housing Capacity study.	Noted.	The preferred option will seek to meet and indeed exceed the housing target in accordance with national and regional policy guidance.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 1: Housing Mix & Type	Needs assessment should have regard to regional and sub-regional housing needs assessment, including the GLAs London wide Housing Requirements Study.	Noted. Council is in the process of updating its Housing Needs Study.	

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 1: Housing Mix & Type	Option 1.1 is supported. However Option 1.2 in relation to guidance on market sector housing mix is also supported so long as it is in accordance with the terms set out in the Mayor's draft Housing Provision SPG and is not over prescriptive. This would be consistent with the new London Housing Strategy approved by the London Housing Board.	Noted.	Preferred options will be drafted in accordance with regional policy guidance for housing.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Option 2: Special Needs Accommodation	Option 2.1 is supported. This should also reflect sub-regional and regional requirements.	Noted.	The preferred option will support and encourage special needs housing.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 3: Gypsy & Traveller Sites	Support Option 3.1. However this needs to be expanded to refer to assessment of need for additional provision and to refer to recent ODPM circular.	Noted. A regional needs study is currently being undertaken on behalf of London Borough's by the GLA. In the meantime, the policy guidance from Circular 01/06 will be followed.	Preferred option will adopt comments.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Empty homes general	This needs to include setting a target for long-term vacant to contribute to housing supply.	Noted.	The preferred option will incorporate the vacant housing target for LBL.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Affordable housing general	Intermediate housing needs to be defined in accordance with London Plan Policy 3A.6 and supporting text and having regard to Mayor's draft Affordable Housing SPG.	Noted.	The preferred options will adopted relevant definitions.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 5 & 6: Affordable Housing Thresholds & Contributions	Council needs to set a borough wide Affordable Housing target consistent with the London Plan.	Noted. The target set by LBL is consistent with the UDP and reflects economic evidence and local circumstances.	Where there is inconsistency between a preferred option and the regional plan, the Council will prepare and submit evidence to justify its decisions.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 9: Replacement of Housing Lost	Reference should be same or higher density, as appropriate and consistent with London Plan density guidance.	Agree.	Preferred option will be drafted to reflect comments.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
61	Peter Richardson	Friends of Manor House Library	General	There is no point in me commenting on these proposals. I agree with so little of these top-down 'other views' opine, in my opinion I am convinced the decision for Lewisham to follow them meekly has already been taken.	No comment.	N/A
63	Paul Woods	Paragon Planning	Issue 0: Provision of new homes and housing target	It is important that the Council seeks to exceed the London Plan target of 17,350 additional homes for Lewisham over the period 1997-2016 in line with the London Plan policies. Option 0.2 would accord with this approach.	Housing targets are set by the regional plan, in this case the London Plan. The targets are not a ceiling and can be exceeded.	Preferred option will be drafted to reflect this aspiration and requirement.
63	Paul Woods	Paragon Planning	Issue 5 & 6: Affordable Housing Thresholds & Contributions	The threshold for the provision of affordable housing should accord with current adopted government guidance within PPG3 and Circular 06/98 namely developments of 15 or more dwellings or sites of 0.5 hectares and above. Option 5.1 should therefore be pursued.	Circular 6/98 has been superseded by PPS3. Government guidance seeks the provision of affordable housing. The London Plan provides a figure of 50% affordable housing from all sources. There is a need for the local development plan to be in conformity with the regional plan.	The preferred option will set a target for affordable housing. This will be the starting point for negotiations. The preferred option will be drafted in accordance with national and regional policy and guidance, and in response to local circumstances.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
63	Paul Woods	Paragon Planning	Issue 5 & 6: Affordable Housing Thresholds & Contributions	The starting point for negotiation of contributions towards affordable housing should be 35% and the policy drafting should reflect the approach set out in the current adopted UDP. It should be recognised in the LDF that the scale of contribution will vary from site to site, dependant on site conditions, market conditions and other material considerations.	Agree. The Council see 35% as realistic and achievable. This figure responds to local circumstances.	The preferred option will seek 35%.
63	Paul Woods	Paragon Planning	Issue 5 & 6: Affordable Housing Thresholds & Contributions	It should be recognised that the 50% figure noted at Policy 3A.7 of the London Plan is a strategic target to include affordable housing from all sources and not just that secured through planning obligations. A starting point of 35% provision would not fetter the Council's ability to negotiate for a higher level of provision where individual site circumstances justify such an approach. We would therefore recommend pursuing Option 6.2.	Agree. The Council see 35% as realistic and achievable. This figure responds to local circumstances.	The preferred option will seek 35%.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
63	Paul Woods	Paragon Planning	Issue 7: Affordable Housing, Mixed & Balanced Communities & Tenure	Recommend generally seeking 70% social rented and 30% intermediate as part of any affordable housing provision on the basis that this accords with Policy 3A.7 of the London Plan. However, we recognise that such an approach may not always be appropriate particularly in areas with a relatively high existing concentration of social rented housing and would therefore recommend pursuing option 7.2.	Noted. The preferred options will reflect the desire to see mixed and balanced communities. Any figure proposed will be the starting point for negotiations.	Preferred options will be drafted in accordance with national and regional policy guidance for mixed and balanced communities and local circumstances.
63	Paul Woods	Paragon Planning	Issue 8: Lifetime Homes/Wheelchair Accessible Homes	Recommend Option 8.4 on the basis that it may not always be possible or viable to provide wheelchair accessible housing on smaller schemes, particularly conversions.	Noted.	The preferred option will ensure the provision of Lifetime Homes.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
64/66	MG Bacchus	Telegraph Hill Society	General	There seems to be no sensible way of dealing with the issue of social housing (such as paying key-workers a reasonable wage in the first place), the housing planning policies have to deal with the issues as best they can and provide as much housing as they can, although they are probably the wrong and inappropriate mechanism for this.	Noted. Some of the matters raised are outside the remit of the LDF.	N/A
64/66	MG Bacchus	Telegraph Hill Society	Issue 7: Affordable Housing, Mixed & Balanced Communities & Tenure	We find this a difficult issue but are broadly content with the current HSG15. We note the wide disparity of provision by ward and feel there should be some mechanism for levelling out the provision and mix across the borough so that the risk of creating ghettos is minimised and proper integration can take place.	Noted. The preferred options will reflect the desire to see mixed and balanced communities and reflect local circumstances and mix.	Preferred options will be drafted in accordance with national and regional policy guidance for mixed and balanced communities and local circumstances.
64/66	MG Bacchus	Telegraph Hill Society	Issue 8: Lifetime Homes/Wheelchair Accessible Homes	Ask that the issue of accessibility in converted properties be taken into account.	Noted. The emphasis will be on new residential development and cases will be assessed on their merits.	The preferred option will ensure the provision of Lifetime Homes.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
64/66	MG Bacchus	Telegraph Hill Society	Issue 9: Replacement of Housing Lost	Option 9.3. Loss of housing should be examined on a case by case basis. There are may well be situations where a loss of housing is appropriate (for example the creation of a new park) and others where replacement at a higher density is required.	Agree.	Preferred option will be drafted to ensure redevelopment replaces housing at the same or higher density, however, the merits of the case will always be considered.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
64/66	MG Bacchus	Telegraph Hill Society	Issue 10: Housing Conversions	<p>This is an area which concerns us deeply. As a general policy, option 10.3 is probably appropriate but with additional safeguards. As it exists it does not create mixed and balanced communities nor does it keep families in the area. The definition of an appropriate family unit needs to be reconsidered - it should be larger than at present with a minimum of three bedrooms (of which two should be double bedrooms), a living room and separate kitchen together with adequate storage space. It should have access to separate garden space and, except in exceptional circumstances, should have ground floor access. No more than 50% of properties in one street should be converted and set area by area and incorporated into relevant Conservation Area plans.</p>	<p>Family housing should be provided as part of a conversion. However, Council cannot force families to live there, nor indeed force 'non-families' not to live there. Dwelling standards (including room sizes) are contained in the LDFs Residential Standards SPD.</p>	<p>Family dwellings will need to be provided as part of a conversion. This will need to be in the form of a three bedroom dwelling. The preferred option will be drafted to reflect the issues raised.</p>

URBAN DESIGN & CONSERVATION

LIST OF RESPONDENTS FOR **URBAN DESIGN AND CONSERVATION** ISSUES AND OPTIONS CONSULTATION

RESPONDENTS IDENTIFICATION NUMBER	RESPONDENT
2	Anonymous
3	Councillor Ingleby, London Borough of Lewisham
4	Councillor Ingleby, London Borough of Lewisham
6	Anonymous
11	Grove Park Community Group, 268 Baring Road
15	James Amos, Hephher Dixon
16	Pat Trembath Sydenham Society
19	Peter Dean, The Blackheath Society
23	RG Pickett, Diocese of Southwark
30	Susan Gore, Ladywell Society
31	Susan Gore, Ladywell Society
32	Donna Carr, Public Health Programmes Manager, Director of Public Health,
35	Linden Groves, Garden History Society
42	Planning Perspectives on behalf of Castlemore Securities and Secondsite Property Holdings
44	Paula Carney, RPS Planning
50	Jeremy Scott, Indigo Scott
52	Andrew Reid, on behalf of Tewkesbury Lodge Estate
56	Jonathan Sheldon, Home Builders Federation
60	Giles Dolphin, Greater London Authority, Policy & Partnerships Directorate
61	Peter Richardson, The Users & Friends of Manor House Library
62	Fiona McNie, Environment Agency
64	MG Bacchus, Telegraph Hill Society

Schedule of Representations

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
4	Councillor Ingleby	London Borough of Lewisham	Issue 1: Development in Context	Supports development being at the highest density according to the nature of the context and that it would successfully preserve the character of the borough but that development should not always maximise use, since use of public space is crucial. Only supports higher density in town centres if in combination with this.	Agree that options need to be combined	A combined policy including elements of all options presented will be put forward as a Preferred Option
4	Councillor Ingleby	London Borough of Lewisham	Issue 2: Historic Environment	Refer to historical public perceptions of how communities feel about their public spaces and buildings, to articulate development of them (see public space in Adelaide, South Australia)	Aspects of this could be taken on board as part of the development process consultation	No change proposed

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
4	Councillor Ingleby	London Borough of Lewisham	Issue 4: High Buildings:	Supports both options for well located high buildings in Lewisham, and also directed to Lewisham and Catford Town Centres Should look at sustainability of energy use. Make sure there are a range of uses not all just business or all residential.	Comments on sustainability will be dealt with in appropriate section of the Development Plan Documents. Mixed Use development is supported as a means of promoting regeneration.	Policies incorporating these elements will be included in the Development Plan Documents
4	Councillor Ingleby	London Borough of Lewisham	Issue 5: Views and Landmarks	Did not support adding additional views and landmarks	No response required	No change required
4	Councillor Ingleby	London Borough of Lewisham	Issue 6: Areas of Special Character	Did not support Sydenham Ridge Area of Special Character	the retention of the Sydenham Ridge Area of Special Character is supported as it is an important landscape feature within the borough that has not other policy protection	No change in response to this comment

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
4	Councillor Ingleby	London Borough of Lewisham	Issue 7: Improving the Image of the Borough - Reducing Crime & the Fear of Crime - the Inclusive & Accessible Environment	Use Inter-cultural design. The configuration of public seating and threshold treatments in public spaces must be welcoming. Consideration of what a public space means, especially when referring to or including historical or perceived memory of an area. Good inter-cultural design requiring consultation with communities and reminiscences.	These comments can be taken on board as part of more detailed design studies or master plans of various sites	No change in response to this comment
11	Grove Park Community Group	268 Baring Rd	Issue 1: Development in Context:	Supports development at the highest density and intensity according to context. Does not support highest density in town centres. Density should be decided according to local conditions and in consultation with local residents.	The Council agrees that development should be carried out according to local conditions and in consultation and that it should be carried out at the highest appropriate density	The Council is proposing a policy option that combines elements of both options together with other elements such as Public Transport Accessibility
11	Grove Park Community Group	268 Baring Rd	Issue 3: River Thames & Frontage & The River Network: Suggestions for Footpaths	Footpaths should not be used by cyclists.	This is a detailed design issue which cannot be dealt with in policy	No change in response to this comment

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
11	Grove Park Community Group	268 Baring Rd	Issue 4: High Buildings:	Does not agree with any option for high buildings in Lewisham Better design and use of made space. Mistakes of the past have not been taken into account.	The Council cannot rule out the possibility of high buildings within Lewisham	No change in response to this comment
11	Grove Park Community Group	268 Baring Rd	Issue 5: Views & Landmarks	Views over Metropolitan Open Land	Policy will protect the open character of Metropolitan Open Land	No change in response to this comment
11	Grove Park Community Group	268 Baring Rd	Issues 6: Areas of Special Character	All should continue to be protected.	It is considered that the River Thames and Blackheath have adequate policy protection. Sydenham Ridge is a significant landscape feature with no policy protection	Preferred Option is policy to protect Sydenham Ridge Area of Special Landscape Character
11	Grove Park Community Group	268 Baring Rd	Issue 7: Improving the Image of the Borough - Reducing Crime & the Fear of Crime - the Inclusive & Accessible Environment	Traffic needs to be addressed.	This comment is noted	No change in response to this comment

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
15	James Amos	Hepher Dixon	Issue 1: Development in Context	Government guidance & regional policy is to increase the density of development through planning policy & high quality design. This should apply to all areas. To achieve housing targets in government regional policy, higher density development should be permitted in areas outside town centres.	The Council agrees with the response but in accordance with various criteria including the built context, and public transport accessibility levels	Preferred Option will be policy that includes these elements
15	James Amos	Hepher Dixon	Issue 4: High Buildings	Provided that the criteria are applied consistently & in the light of London Plan Policy, the criteria appears adequate.	No response required	No response required
15	James Amos	Hepher Dixon	Issue 5: Views & Landmarks	Further protection could hinder the need for high quality, high density development.	The Council will keep these issues under review and ensure that appropriate views and landmarks are protected	No response required

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
16	Pat Trembath	Sydenham Society	Issue 1: Development in Context	Did not support maximising density according to context. Supported higher densities in Town Centres only. Context of architectural quality & surrounding street scene should be strongly taken into account. Higher density should only be in town centres. But for sustainability town centres need to retain their character.	The Council does not agree that higher density should only occur in town centres, an that it is possible to tailor density on other sites according to the surrounding urban context and public transport accessibility	Preferred Option will be policy reflecting these elements
16	Pat Trembath	Sydenham Society	Issue 2: Historic Environment	In Sydenham the Lawrie Park Triangle protection status together with a no. of roads in Lower Sydenham suggested over 10 years ago by Sydenham Society. No action so far by LBL. Also the Christmas Houses - Perry vale, Gaynesford, Church Rise, Sunderland Rd + South Rd should be considered for conservation status	These comments will be forwarded to the Conservation Areas Team for their rolling programme of Conservation Area Appraisals and Supplementary Planning Documents	No change required
16	Pat Trembath	Sydenham Society	Issue 3: River Thames & Frontage & The River Network	River frontage and views should be sensitively preserved.	The Council agrees with these comments	Preferred Options policy will take these elements into consideration

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
16	Pat Trembath	Sydenham Society	Improvements to Cycle paths	Suggest using railway corridors to create direct cycle paths into central London	A matter for future discussion with Network Rail who own and control this land	No change required
16	Pat Trembath	Sydenham Society	Issues 4: High Buildings - t	Supports new high buildings if well located and compatible with context. Considers that high buildings will be welcome in Lewisham and Catford Town Centres	The Council will ensure that policies require appropriate location of high buildings	Preferred Options policy for high buildings reflecting these elements
16	Pat Trembath	Sydenham Society	Issue 5: Views & Landmarks	Wish to add Cobbs Corner as a landmark and key entrance / gateway to Borough. Supports vistas' protection including that encapsulated by Pissaro of Laurie Park Ave + St Barts, 'greenness' of Upper Sydenham + vista from top of Wells Park over Kent.	The vista to St Barts is already protected as the church is classified as a local landmark which development should not obscure. The Council will examine the suggestion for a view from Wells Park over Kent but could only directly control development in the foreground of the view	For further examination

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
16	Pat Trembath	Sydenham Society	Issue 6: Areas of Special Character:	Supports retention of all existing Areas of Special Character. Sydenham Ridge is the highest ridge in South London with panoramic views over London & Kent. This ridge needs full protection.	The Council considers that Blackheath and the River Thames have adequate policy protection. The Council supports the Sydenham Ridge Area of Special Landscape Character as an important landscape element that lacks other policy protection	Preferred Option for Sydenham Ridge Area of Special Landscape Quality
19	Peter Dean	The Blackheath Society	Issue 1: Development in Context: Supports development at the highest density and intensity according to context. Does not support highest density in town centres.	Allow flexibility - context studies and conservation area appraisals to give developers an idea of what would be acceptable. The option for a high density in the major town centres and a general density standard across the rest of the borough would be restrictive, inappropriate and difficult to establish	The Council agrees that a general density across the borough would be inflexible. A policy incorporating several elements to make this judgement for different sites will be included.	Preferred Option Density Policy reflecting various criteria for judging density
19	Peter Dean	The Blackheath Society	Issue 2: Historic Environment	Encourage sensitive modern infill.	This will be allowed for in policy.	Preferred Option policy will include this possibility
19	Peter Dean	The Blackheath Society	Issue 3: River Thames & Frontage & The River Network	Suggested the creation of additional/extended water areas.	A detailed comment that for individual masterplanning of sites	No response required

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
19	Peter Dean	The Blackheath Society	Issue 4: High Buildings	Suggested combining options for high buildings in context and high buildings in Lewisham and Catford town Centres	The Council agrees with this approach	Preferred Options policy will take these elements into consideration
19	Peter Dean	The Blackheath Society	Issue 6: Areas of Special Character:	Supported ASCs for Blackheath and Thames. Although Blackheath is covered by other designations, these do not specifically cover skylines and the promotion of traffic-free enclaves. Need more help.	The Council considers that Blackheath and the River Thames have adequate policy protection. The Council supports the Sydenham Ridge Area of Special Landscape Character as an important landscape element that lacks other policy protection	Preferred Option Policy protecting Sydenham Ridge Area of Special Landscape Character
23	RG Pickett	Diocese of Southwark	Issue 1: Development in Context	Did not support development being at the highest appropriate density and intensity as being more likely to produce anomalous schemes. Option for high densities in town centres and standard densities could achieve aim of compact city if sufficient flexibility could be provided.	The Council is promoting a flexible policy to allow appropriate density to be judged according to context and Public Transport Accessibility.	Preferred Options policy will take these elements into consideration

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
23	RG Pickett	Diocese of Southwark	Issue 2: Historic Environment	Policies should be drafted to preserve historic buildings of architectural merit but not because they are historic per se.	The Council protects buildings as listed by English Heritage and appropriately within Conservation Areas and is conducting a series of character appraisals to make these judgements explicit	No response required
23	RG Pickett	Diocese of Southwark	Issue 4: High Buildings	Assess options for their locations on merits. Would need strong criteria based policy in order to judge appropriateness of buildings.	The Council is including a strong criteria based policy	Preferred Option to include High buildings policy
23	RG Pickett	Diocese of Southwark	Issue 7: Improving the Image of the Borough - Reducing Crime & the Fear of Crime - the Inclusive & Accessible Environment	Amend Appendix 2, Green Elements, 6th bullet point - to permit felling & loss of trees where existing trees impair the stability of existing buildings & free standing walls.	The policy allows for the appropriate felling of trees which will be judged according to circumstances	No change proposed
31	Susan Gore	Ladywell Society	Issue 1: Development in Context Supports high densities in town centres only rather than on maximising	Maximising use of sites is subject to wide interpretation. Specific controls can keep buildings in control and maximise use of land.	The Council is proposing strong urban design and flexible density policies that allow for context and public transport accessibility to be taken into account when judging appropriate densities.	Preferred Option policy will include these elements

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
			development on all sites			
31	Susan Gore	Ladywell Society	Issue 2: Historic Environment	More planning consideration given to the Ladywell area next to St Mary's Conservation Area. Support for incorporating the Vicars Hill homes opposite Hilly Fields. Integration of townscape around older buildings instead of other way around. Give greater protection to locally listed buildings.	Comments referred to Conservation Team. The Council has no extra powers to protect locally listed buildings.	No change proposed
31	Susan Gore	Ladywell Society	Issue 3: River Thames & Frontage & The River Network	Integration of townscape around older buildings instead of other way around	This is a comment relating to detailed masterplanning on sites	No change proposed
31	Susan Gore	Ladywell Society	Issue 3: River Thames & Frontage & The River Network	Use section 106 to get funding to enhance and protect river environments from bank-side development.	The Council is including polices to protect the riverside which will enable S106 agreements to take advantage of	See left
31	Susan Gore	Ladywell Society	New suggestions for Improving/extending Waterlink Way	Cycle/foot paths alongside Ravensbourne from Brookmill Park to Ladywell Fields. New developments should have to leave space for paths	The Council is safeguarding Waterlink Way	No change proposed

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
31	Susan Gore	Ladywell Society	Issue 4: High Buildings. Supports locating high buildings in Lewisham and Catford Town Centres	The suggested ways of judging the quality and appropriateness of high buildings are vague. In residential areas, to be in context with the local area the height should follow the height of surrounding	The Council is proposing a policy with appropriate criteria	Preferred Options policy on High Buildings
31	Susan Gore	Ladywell Society	Issue 5: Views & Landmarks Supports addition of extra views/vistas	Should include vistas. Especially Greenwich from Thornville and Friendly St Deptford, Canary Wharf framed by Tyrwhitt, Brockley as seen from Hilly Fields Crescent, Tyrwhitt Rd Junction	These suggested views are not from public open spaces, which is the basic criteria used for designation of a Local View. They would be taken into account in the case of detailed development proposals.	No change proposed
31	Susan Gore	Ladywell Society	Issue 6: Areas of Special Character	Continue to protect all Areas. These areas are greatly valued as is reflected in house prices	The Council is not proposing to redesignate Blackheath and the Thames as Areas of Special Character as there are several overlapping layers of policy protection. The Council is proposing to designate the Sydenham Ridge Area of Special Landscape Character which has no other specific policy protection	Preferred Option is designation of Sydenham Ridge Area of Special Landscape Character

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
31	Susan Gore	Ladywell Society	Issue 7: Improving the Image of the Borough - Reducing Crime & the Fear of Crime - the Inclusive & Accessible Environment	New public space overlooked by homes, shops, etc. Wide and well lit road & footpath access for new developments.	These elements will be included in policy	Preferred Option will include these elements
32	Donna Carr	Public Health Programmes Manager, Director of Public Health,	Main Issues Raised	Higher density development around points of high accessibility allows for good location of health facilities, preferably co-located with other community facilities. Crime and disorder has definite health impacts and affects mental well being in many areas, for example, the direct impacts on A & E staff.	The Council will include policies relating to these elements	See left
42	Planning Perspectives	On behalf of Castlemore Securities and Second site Property Holdings	Issue 1: Development in Context:	Supported highest density and intensity according to context and did not support high density development in town centres only	The Council will be introducing a policy that will judge density according to various contextual elements.	See left

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
42	Planning Perspectives	On behalf of Castlemore Securities and Second site Property Holdings	Issue 4: High Buildings	Considers that high buildings should be welcome in Lewisham if they are well located and compatible with context and does not support directing them to Lewisham and Catford Town Centres only	The Council will include policies relating to these elements	See left
42	Planning Perspectives	On behalf of Castlemore Securities and Second site Property Holdings	Issues 6: Areas of Special Character	Supports continuation of protection of ASCs	The Council is not proposing to redesignate Blackheath and the Thames as Areas of Special Character as there are several overlapping layers of policy protection. The Council is proposing to designate the Sydenham Ridge Area of Special Landscape Character which has no other specific policy protection	Preferred Option is designation of Sydenham Ridge Area of Special Landscape Character

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
44	RPS Planning	RPS Planning	Issue 1: Development in Context	<p>Considers that Options for high density in town centres and high density according to context should be merged and amended. Agrees that Town Centres should be at a high density but best use needs to be made of all urban sites to achieve sustainable development. Sites outside Town centres should be judged on merit but with high density normally supported. Not appropriate to set standards for the rest of the borough which could stifle innovative design and under use land. We would support an option that high density is encouraged on all urban site without detailed density standards set.</p>	The Council will include policies relating to these elements	See left

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
44	RPS Planning	RPS Planning	Issue 4: High Buildings	Over the last decade it has been shown that tall buildings can make a significant beneficial contribution to the London skyline. We support the incorporation of tall buildings within the borough of Lewisham where they would not compromise important viewing corridors, transport capacity, or good amenity.	The Council will include policies relating to these elements	See left
44	RPS Planning	RPS Planning	Issue 5: Views & Landmarks	Did not support additional views as except in exceptional circumstances it dilutes the purpose of maintaining the best views and adds complication to planning process	The Council will keep these issues under review and ensure that appropriate views and landmarks are protected	No change required

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
44	RPS Planning	RPS Planning	Issue 7: Improving the Image of the Borough - Reducing Crime & the Fear of Crime - the Inclusive & Accessible Environment	Good urban design can create communities to be proud of and stimulate inward investment. Good urban design should be encouraged at all times. We agree that crime prevention should be a key principle of urban design via the maximisation of surveillance, the creation of clear public routes and pedestrian access.	These elements will be included in policy	See left
50	Jeremy Scott	Indigo Scott	Issue 1: Development in Context	It is important to maximise densities if the growth objectives of the Borough are to be realised. Considers that high density in town centres only would not satisfy the housing and commercial growth requirements of the Council.	The Council is proposing strong urban design and flexible density policies that allow for context and public transport accessibility to be taken into account when judging appropriate densities.	See left

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
50	Jeremy Scott	Indigo Scott	Issue 4: High Buildings	Option of relocating high buildings in Lewisham provided they are well located and compatible with local context is adequate. Criteria should be flexible, whilst having regard to sensitive areas	The Council will include policies relating to these elements	See left
52	Andrew Reid	Tewkesbury Lodge Estate	Issue 1: Development in Context	Support development at highest density and intensity according to context but requires a thorough study of Borough then would provide valuable input into development decisions - but costly to implement. High density in town centres, and standard densities elsewhere is 'broad brush' but would achieve most results of the first option but at lower cost.	The Council is proposing strong urban design and flexible density policies that allow for context and public transport accessibility to be taken into account when judging appropriate densities.	See left
52	Andrew Reid	Tewkesbury Lodge Estate	Issue 2: Historic Environment	More areas of hills (e.g. the hill behind the Horniman) could be further protected. However, the stated principles are good.	Comments noted	No change proposed

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
52	Andrew Reid	Tewkesbury Lodge Estate	Issue 4: High Buildings	Supports high buildings appropriate to local context and also within Lewisham and Catford Town Centres, but applications for high density buildings elsewhere should still be considered on their merits. Criteria suggested adequate but more needed for high residential buildings.	The Council will include policies relating to these elements	See left
52	Andrew Reid	Tewkesbury Lodge Estate	Issue 5: Views & Landmarks	North west view of London, centred on London Eye & BT Tower from Canonbie Rd.	These suggested views are not from public open spaces, which is the basic criteria used for designation of a Local View. They would be taken into account in the case of detailed development proposals.	See left
52	Andrew Reid	Tewkesbury Lodge Estate	Issue 6: Areas of Special Character	Supports inclusion of Sydenham Ridge ASC	The Council agrees with this approach	Preferred Policy Option for Sydenham Ridge Area of Special Landscape Character

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
52	Andrew Reid	Tewkesbury Lodge Estate	Issue 7: Improving the Image of the Borough - Reducing Crime & the Fear of Crime - the Inclusive & Accessible Environment	Concerned at apparent conflicts between policies in this document and with the 'housing' paper. Plans for 'mixed + balanced communities', lifetime home standards, disabled access to all properties etc could conflict with retaining the character of neighbourhoods uniformity of design. Needs to be addressed.	This balancing act needs to be achieved by the Planning Service	No change proposed
56	Jonathan Sheldon	Home Builders Federation	Issue 1: Development in Context	Broader aims of sustainable development will still be met by increasing densities at those areas with good public transport. This approach will also help ensure that a wide range of differing sizes and types of dwellings could potentially be developed.	The Council is proposing strong urban design and flexible density policies that allow for context and public transport accessibility to be taken into account when judging appropriate densities.	See left

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
56	Jonathan Sheldon	Home Builders Federation	Issue 7: Improving the Image of the Borough - Reducing Crime & the Fear of Crime - the Inclusive & Accessible Environment	Re: stipulation of 'visual interest at ground floor level to promote a lively pedestrian environment', this is often interpreted as mixed-use in high-density residential development with retail or similar on ground floor. This leads to developments which are unable to let ground floor due to lack of demand, thus creating faceless facades (to the detriment of all). Any insistence of such an approach must respect market conditions as well as existing local business	The Council is committed to mixed use development and to ensuring a lively street scene. This could include commercial uses at ground floor level or alternatively commercial uses in blocks. This is a matter for masterplanning of individual sites.	No change proposed
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 1: Development in Context	Option to Maximise density according to context and option for high density in town centres and standard density elsewhere incorrectly interpret the London Plan. An alternative options should be draft which reflects Policy 4A.3 and Table 4B.1 of the London Plan.	The Council is proposing a policy which meets these requirements in the Lewisham context	See left

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 4: High Buildings	Option for high buildings appropriately located or in Lewisham and Catford Town Centres. not in conformity with the London Plan - a clear explanation as to the perceived harm to sensitive areas is required. Allowing high buildings according to general siting criteria and with design criteria is in accordance with London Plan policy. This approach involves fewer presumptions and allows for innovation an uniqueness.	The Council is proposing a policy which meets these requirements in the Lewisham context	See left
61	Peter Richardson	The Users & Friends of Manor House Library	Issue 1: Development in Context	Already over populated. No record of achievement. Disagrees with higher density due to over population, failure to preserve character of borough. This will only achieve more unsocial behaviour in people competing for space, car parking, public transport, water & power resources et al.	The Council is proposing policies to ensure the preservation of residential amenity of new developments and to ensure that appropriate community facilities are an integral part of new developments	No change proposed

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
61	Peter Richardson	The Users & Friends of Manor House Library	Issue 2: The Historic Environment	Protection policies should be strengthened in view of past failures to implement them.	The content of these policies is largely governed by Central government legislation	No change proposed
61	Peter Richardson	The Users & Friends of Manor House Library	Issue 5: Views & Landmarks	Views across Blackheath and Mountsfield Park, and Manor House Library through glades of Manor House Gardens should be added to views.	The open space character of Blackheath is protected by Conservation Area designation and the views from Mountsfield Park are already protected as a Local view. The setting of Manor House Library is protected as it is a Listed Building set within open space to the rear.	No change proposed
62	Fiona McNie	The Environment Agency	Issue 3: River Thames Frontage and the River Network	Suggestions for improvement - would like to see naturalized buffer zones and a stepped approach to flood defences to create new habitats. Cycleways should be set back from these zones to allow a full naturalized area.	Policy elements for these buffer zones will be included in the Open space section of DPDs.	No change proposed

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
62	Fiona McNie	The Environment Agency	Issue 6: Areas of Special Character	Support all UDP designations of ASCs in order to help support biodiversity.	The Council is not proposing to redesignate Blackheath and the Thames as Areas of Special Character as there are several overlapping layers of policy protection. The Council is proposing to designate the Sydenham Ridge Area of Special Landscape Character which has no other specific policy protection. Biodiversity on all sites is protected by other policies within the Urban Design and Open Space chapters.	No change proposed

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
64	MG Bacchus	Telegraph Hill Society	Issue 1: Development in Context	Supports option for higher density in town centres, and flat rate density elsewhere. Concerned over high number of flat conversions which is unbalancing the community and making it difficult for families to find accommodation.	The Council is proposing strong urban design and flexible density policies that allow for context and public transport accessibility to be taken into account when judging appropriate densities. It is considered that a flat rate density for the rest of the borough will not make the best use of sites and will lead to less sustainable development. Policies in the Housing chapter will require a family unit to be provided in the case of housing conversion into flats.	See left
64	MG Bacchus	Telegraph Hill Society	Issue 2: Historic Environment	Agree Council has a duty to protect the historic environment. Local implementation of planning policy is not working. Planning decisions are merely reducing the rate at which declines take place and, in some instances, actually assisting the decline. Council should seek to	This comment relates to implementation not policy. A programme of Article 4 directions is being undertaken by the Council.	No change proposed

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
				implement Article 4 directions to preserve Conservation Areas.		
64	MG Bacchus	Telegraph Hill Society	Issue 4: High Buildings	Supports option to direct high buildings to Lewisham and Catford. There needs to be priorities set within the judging criteria for high buildings.	The Council will include policies relating to these elements	See left
64	MG Bacchus	Telegraph Hill Society	Issue 5: Views & Landmarks	Deptford Town Hall façade	The setting of the façade of Deptford Town Hall is protected as it is a Listed Building	No change proposed
64	MG Bacchus	Telegraph Hill Society	Issue 6: Areas of Special Character	Supports continued designation of all ASCs as shown in the UDP	The Council is not proposing to redesignate Blackheath and the Thames as Areas of Special Character as there are several overlapping layers of policy protection. The Council is proposing to designate the Sydenham Ridge Area of Special Landscape Character which has no other specific policy protection. Biodiversity on all sites is protected by other policies within the Urban Design and Open Space chapters.	Preferred Option designation of Sydenham Ridge Area of Special Landscape Character

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
64	MG Bacchus	Telegraph Hill Society	Issue 7: Improving the Image of the Borough - Reducing Crime & the Fear of Crime - the Inclusive & Accessible Environment	Policy required to limit flat conversions. Policy required for urban design to seek to foster and preserve local communities.	Policies in the Housing Chapter will required a family unit within flat conversions. Urban design policies will seek to create a sense of place, foster inclusion and a safe and accessible environment	See left
6	None Given		General Urban Design Comments	There is a need to accept that there may be an increase in the number of high buildings. Design quality must be a of a high standard.	The Council agrees that design quality should be of a high standard	Include criteria in Preferred Option for High Buildings policy
2	None Given		General Urban Design Comments	Need to stress riparian developments should not make Thames into a residential alleyway as has happened further upstream.	The Council is proposing that the riverfronts should be lively and varied and respect the character of the river	Preferred policy will include these elements
3	Councillor Ingleby		General Urban Design Comments	Lack of training for Councillors in urban design terminology - should be trained to develop an 'objective' design language of criticism	This is not a matter that can be addressed by the LDF	Comments noted

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
30	Susan Gore	Ladywell Society	General Urban Design Comments	No mention or options proposed on amenity spaces / gardens for residential developments and their importance.	This was included in the Housing Issues and Options paper	Comments noted
30	Susan Gore	Ladywell Society	General Urban Design Comments	Good principles but will encourage developers to put in applications for inappropriate, over-dense and over-high developments. Then LDF will be subject to interpretation of unspecified standards in their favour. Integration of townscape with old buildings rather than other way round especially in special areas	The proposed policy on density should be adequate to judge the appropriate density of developments.	See left
35	Linden Groves	Garden History Society	General Urban Design Comments	Should give historic parks and gardens and other designed landscapes and open space their own issue number.	This was an open space issue	Comments noted

SUSTAINABLE ENVIRONMENT

LIST OF RESPONDENTS FOR **SUSTAINABLE ENVIRONMENT** ISSUES AND OPTIONS CONSULTATION

RESPONDENTS IDENTIFICATION NUMBER	RESPONDENT
2	Anonymous
6	Cllr Ingleby, London Borough of Lewisham
8	Grove Park Community Group, 268 Baring Road
12	James Amos, Hephher Dixon
17	Alona Sheridan, Sydenham Society
22	Peter Dean, The Blackheath Society
29	Susan Gore, Ladywell Society
32	Donna Carr, Directorate of Public Health
46	Fairview Homes C/O RPS Planning
54	Lutz Johnen, Aquality Trading & Consulting Ltd
55	Paula Carney, RPS Planning
56	Jonathan Sheldon, House Builders Federation
60	Giles Dolphin, Greater London Authority, Policy & Partnerships Directorate
61	Peter Richardson, The Users & Friends of Manor House Library
62	Fiona McNie, Environment Agency

Schedule of Representations

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
2	Anonymous		Q9 (Options)	Not the indicators proposed in Option 1.3 or 4.2 or 6.2, support Option 3.6, Use both Options 7.1 and 7.2, Light and Noise are different pollutants and require separate categories	Comments noted	Preferred option will be drafted to reflect comments.
6	Councillor Ingleby	London Borough of Lewisham	Issue 1: Improving the Use of Energy	Make these options clear criteria of the consideration of planning committees.	Agree. These options should be a clear consideration of planning committees	Ensure clarity of future policies regarding improving energy efficiency.
6	Councillor Ingleby	London Borough of Lewisham	Issue 2: Providing for Renewable Energy	10% hard-line	Agree. This option should be adopted subject to change from central or regional government	10% hard line to be adopted.
6	Councillor Ingleby	London Borough of Lewisham	Issue 2: Providing for Renewable Energy	Should encourage mixed use and zero-carbon simultaneously	Partly agree, the Council supports mixed use development and this will be encouraged. The Council also recognises the need to reduce carbon emissions and the future policy will seek to firstly improve the efficiency of what is released. It is considered that Lewisham hasn't got the infrastructure at present to facilitate zero carbon development across the board.	Adopt mixed use development and increase the efficiency of buildings to minimise resources used.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
6	Councillor Ingleby	London Borough of Lewisham	Issue 9: Sustainable Use of Building Materials & Aggregates	Should encourage or specify more locally resourced materials at an appropriate percentage.	Agree. Sustainable construction methods should be encouraged.	As per officer response.
8	Grove Park Community Group	268 Baring Rd	Issue 1: Improving the Use of Energy	Provide information about sustainable energy.	Agree. Information regarding sustainable energy should be shared with all parties.	As per officer response.
8	Grove Park Community Group	268 Baring Rd	Issue 2: Providing for Renewable Energy	Concern about wind turbines complying with human rights and health & safety legislation.	Wind turbines are considered to be very effective at utilising the wind to generate electricity. Some households may wish to install them within their property and as such will need to submit a planning application which will assess any impact with regard to scale, form, location and amenity. As such these concerns should be addressed in the normal way.	No changes proposed.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
8	Grove Park Community Group	268 Baring Rd	Issue 4: Air Quality	All council vehicles should be electronically powered. Poor air quality is directly related to excessive & inefficient traffic management	The Council is always reviewing how best to adopt sustainable modes of transport and is constantly seeking ways to improve the air quality and remove blockages that cause traffic to bottleneck.	Review transport policies
8	Grove Park Community Group	268 Baring Rd	Issue 8: Noise & Light Effects	Noisy neighbours, traffic & rail	Effective policies are needed to ensure buildings are well sound proofed from outside environments	As per officer response.
8	Grove Park Community Group	268 Baring Rd	Issue 8: Noise & Light Effects	Restriction of light pollution	Light pollution is an issue the Council takes very seriously and is heavily scrutinised during the planning process.	As per officer response.
8	Grove Park Community Group	268 Baring Rd	Issue 9: Sustainable Use of Building Materials & Aggregates	Recycled materials.	Agree. The Council will promote the use of recycled materials	Recycling to be promoted in future policy.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
12	James Amos	Hepher Dixon	Issue 1: Improving the Use of Energy	Option 1.2 is overly prescriptive and doesn't consider site characteristics precluding criteria. Could make development proposals unviable.	If the option is selected it will be applied on a site by site basis. The Council does not want to instil onerous criteria on development proposals, but where there is an opportunity to improve energy efficiency, then this should be fully explored.	No changes proposed.
12	James Amos	Hepher Dixon	Issue 2: Providing for Renewable Energy	Need to assess visual impact of equipment. It may not be suitable in all areas.	The assessment of visual obtrusiveness would be a consideration.	No changes proposed.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
12	James Amos	Hepher Dixon	General Comments	The requirement to look at Renewable Energy on a site should be restricted to larger schemes only and that smaller residential proposals, i.e. less than 10 units should be excluded.	<p>It is considered that many of the boroughs housing will be between 10 and 40 units. Windfall sites which are capable of accommodating 50 units will be less frequent.</p> <p>As such , 10 units is considered to be a realistic target which still enable developments to go ahead without making the proposal unviable. The target will also enable developers to factor in this requirement from an early stage. The requirement for 10% renewable energy shouldn't endanger its market viability.</p>	No changes proposed.
17	Alona Sheridan	Sydenham Society	Issue 1: Improving the Use of Energy	Support 1.2 but too weak. 1.1 addresses climate change better. Council should be proactive + set example. Also less out-of-town shops so less travel	Agree. Both options prove to be acceptable.	As per officer response.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
17	Alona Sheridan	Sydenham Society	Issue 2: Providing for Renewable Energy	Should involve schools and community centres to develop wind + solar schemes as a model.	The Council supports any schemes that seeks to develop wind and/or solar renewable energy sources. The Council actively encourages schools and community centres to adopt these schemes. S.106 agreements can help to promote renewable energy sources in new community developments.	As per officer response.
17	Alona Sheridan	Sydenham Society	Issue 4: Air Quality	Support options BUT should avoid giving planning permission for out-of-centre developments (e.g. Bell Green) which will increase vehicular transport.	Agree. Policy direction will focus all new retail proposals in our town centres. Proposals for out of centre developments will need to undergo the sequential test to prove that there are no available sites within the town centre.	As per officer response.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
17	Alona Sheridan	Sydenham Society	Issue 6: Water Quality, Resources & Infrastructure	Encourage public / school education opportunities for water conservation to avoid clean water going to sewers	New applications for new buildings will need to work towards recycling the waste produced from development. As such future policy will promote the use of water conservation.	As per officer response.
17	Alona Sheridan	Sydenham Society	Issue 8: Noise & Light Effects	Noisy neighbours, traffic, rail & car stereo systems	Effective policies are needed to ensure buildings are well sound proofed from outside environments	As per officer response.
17	Alona Sheridan	Sydenham Society	Issue 9: Sustainable Use of Building Materials & Aggregates	Use recycled aggregates as much as possible.	Agree. Promotion of sustainable construction methods will be adopted.	Promote sustainable construction techniques.
22	Peter Dean	The Blackheath Society	Issue 6: Water Quality, Resources & Infrastructure	Take account of paving front gardens & increasing stormwater runoff	Agree. New development inevitably means a reduction in permeable surfaces. The Council will seek innovative ways to retain soft landscaping but allow the weight of motor vehicles on the surface. The Council will also seek the use of sustainable urban drainage systems to cope with excessive amounts of rainwater.	As per officer response.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
22	Peter Dean	The Blackheath Society	Issue 8: Noise & Light Effects	Aircraft Noise	Although a large part of Lewisham is unaffected from Heathrow bound aircraft when the airport is experiencing busy times, you can find some aircraft circling in the sky. Much of this is largely uncontrollable from a planning view point although the Air quality management team monitor any rise in pollution levels.	No changes proposed.
29	Susan Gore	Ladywell Society	Issue 1: Improving the Use of Energy	Specify targets.	The target for renewable energy sources is due to be set at 20% which has been adopted from the Mayor's London Plan.	20% renewable energy sources will be reflected in the emerging LDF
29	Susan Gore	Ladywell Society	Issue 3: Flood Risk & Climate Change	Add green/brown roofs	Agree, comments noted.	Add green/brown roofs

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
29	Susan Gore	Ladywell Society	Issue 4: Air Quality	Specify targets.	The Council follow guidelines set out by national objectives which limits the amount of particulates and Nitrogen Oxide levels present in the air. The Council will request Air Quality Impact Assessments from applicants to ensure the national levels are not exceeded.	As per officer response.
29	Susan Gore	Ladywell Society	Issue 8: Noise & Light Effects	Noisy neighbours	Effective policies are needed to ensure buildings are well sound proofed from outside environments	As per officer response.
29	Susan Gore	Ladywell Society	Issue 8: Noise & Light Effects	Aircraft Noise	Effective policies are needed to ensure buildings are well sound proofed from outside environments	As per officer response.
32	Donna Carr	Directorate of Public Health	General Comments	You may wish to make a case for better energy ratings and low cost energy generally in order to reduce fuel poverty and reduce the impact of winter temperatures on the elderly and low-income families.	Agree, comments noted.	Reference to energy ratings and low cost energy will be made in the preferred option documents.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
32	Donna Carr	Directorate of Public Health	General Comments	Flood risk is also a health issue	Agree, comments noted.	The importance of flooding will be added to the preferred option documents.
32	Donna Carr	Directorate of Public Health	General Comments	Water availability at affordable cost is a health issue	Agree, comments noted.	The Council will work with Thames Water and other statutory undertakers to ensure the highest quality of water can be supplied at an affordable cost.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
46	Fairview Homes C/O RPS Planning	Fairview Homes C/O RPS Planning	Issue 2: Providing for Renewable Energy	Threshold be increased to schemes of 50 units or more	<p>It is considered that many of the boroughs housing will be between 10 and 40 units. Windfall sites which are capable of accommodating 50 units will be less frequent.</p> <p>As such , 10 units is considered to be a realistic target which still enable developments to go ahead without making the proposal unviable. The target will also enable developers to factor in this requirement from an early stage. The requirement for 10% renewable energy shouldn't endanger its market viability.</p>	No changes proposed.
54	Lutz Johnen	Aquality Trading & Consulting Ltd	Main Issues Raised	Highlights the importance of rainwater harvesting and stormwater management and their role in saving money and the environment.	Agree, comments noted.	Incorporate the use of rainwater management schemes.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
54	Lutz Johnen	Aquality Trading & Consulting Ltd	General Comments	Under the “sustainable communities” development concept, storm-water management and availability of water supplies are important considerations where practical experience shows that rainwater harvesting can play an important dual role	Agree, this is one of many sustainable urban drainage system as well as a good natural way of recycling rainwater.	As per officer response.
54	Lutz Johnen	Aquality Trading & Consulting Ltd	General Comments	Although rainwater harvesting employs tried and trusted technology, its benefits are still relatively little understood in this country; it is for this reason that we would ask your Authority to make clear in Structure Plans and LDFs the importance of giving proper consideration to the use of rainwater harvesting in development proposals prepared to sustainable communities principles.	Agree, comments noted.	Rainwater harvesting to be incorporated into the Preferred Option documents.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
54	Lutz Johnen	Aquality Trading & Consulting Ltd	General Comments	<p>as Policy Guidance goes, we would see this ideally being along the following lines:</p> <p>Policy No 4A.11 : Water supplies</p> <p>Planning permission will not be granted for development where:</p> <ul style="list-style-type: none"> • Adequate water resources do not already exist, or cannot be readily provided • It would lead to the deterioration in the quality of controlled waters • It is likely to pose a risk to existing abstractions, water quality, fisheries, amenities, inland navigations, environmental or conservation matters <p>New development shall seek to include measures to reduce water consumption, to use harvested rainwater to the maximum practicable extent, and to recycle grey water.</p>	Comments noted	To be considered at the Preferred Options stage.
55	Paula Carney	RPS Planning	General Comments	<p>It is important that a sustainability and energy agenda is driven forward across the whole of London</p>	Agree, comments noted.	No changes proposed.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
55	Paula Carney	RPS Planning	General Comments	Notwithstanding, energy and sustainability must be seen as an integral part of the project, and therefore provision must have regard to the overall benefits to be delivered, which sometimes give rise to abnormal costs. In some exceptional cases, it may not be possible to deliver significant energy initiatives together with all the other improvements required to the site and area.	Agree, comments noted.	No changes proposed.
55	Paula Carney	RPS Planning	General Comments	basic principles of sustainability such as reducing the need for private car travel, orientation of residential units, the provision of some form of amenity area with each residential unit, insulation of buildings, recycling of construction material and water meters should be incorporated as a matter of course where at all possible;	Agree, comments noted.	to be included at the Preferred Options stage.
56	Jonathan Sheldon	House Builders Federation	Issue 1: Improving the Use of Energy	Council planning process is limited in its capacity to achieve, given that it can only be applied to new development	Agree, comments noted.	Use of the LDF to promote and educate ways in conserving energy.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
56	Jonathan Sheldon	House Builders Federation	Issue 2: Providing for Renewable Energy	10% where feasible	Agree. The Council will adopt a flexible approach in applying this policy.	As per officer response.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 1: Improving the Use of Energy	Option 1.1 would be more effective by providing a clear policy objective of minimising the contribution of development to carbon dioxide emissions, by integrating land use and transport functions, and requiring all development to maximise energy efficiency and renewable energy technology measures. This would give a framework for options 1.2 and 1.3 whilst remaining consistent with current London Plan policy.	Comments noted.	Preferred option will be drafted to reflect comments.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 1: Improving the Use of Energy	Option 1.2 is welcome as a development control policy. The policy could be enhanced by expecting improvements on Part L of building regulations (and for these to be quantified).	Comments noted.	Preferred option will be drafted to reflect comments.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 1: Improving the Use of Energy	Option 1.3 offers the best approach in planning terms to securing lower carbon dioxide emissions through energy efficient heating systems.	Comments noted	Preferred option will be drafted to reflect comments.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	General Comments	Energy demand assessments should set out the likely baseline energy requirements for electricity, heating and cooling (rather than electricity and gas).	Agree, comments noted.	Preferred option will be drafted to reflect comments.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	General Comments	A policy approach to require demonstration of consistency with a heating hierarchy should also be tied to a policy requiring the incorporation of energy efficient technology where feasible. This would give the necessary 'tool' to help implement the policy effectively, whilst allowing applicants the flexibility to demonstrate cost or technical limitations that may apply	Agree, comments noted.	Preferred option will be drafted to reflect comments.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	General Comments	The Council, in conjunction with the GLA should consider the potential for connections to future district heating systems, in order to provide additional local policy justification for the incorporation of the heating hierarchy.	Agree, comments noted.	Preferred option will be drafted to reflect comments.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 2: Providing for Renewable Energy	Option 2.2 is preferred as it is consistent with the London Plan approach and recognises that there may be conflict with other policy objectives from	Agree, comments noted.	Preferred option will be drafted to reflect comments.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
				measures that may secure 10%.		
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 2: Providing for Renewable Energy	Option 2.3 is welcomed as it seeks to provide policy guidance for standalone renewable energy technologies.	Support welcomed	Preferred option will be drafted to reflect comments.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	General Comments	Proposed inclusion of ambient noise in the Core Spatial Strategy is welcomed.	Support welcomed	Preferred option will be drafted to reflect comments.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 4: Air Quality	<p>The following are suggested policy options for inclusion in the section on Air Quality:</p> <ul style="list-style-type: none"> i. Support new policies which require drivers of stationary vehicles to switch off engines; ii. Policies to promote cleaner technology and alternative fuels as a mechanism to reduce overall emissions, particularly with respect to delivery and freight road vehicles; iii. Measures to encourage the use of alternative transportation modes, such as supporting sustainable transportation networks, implementing a parking strategy and encourage the development of Travel Plans; iv. Wide ranging measures to reduce emissions overall, such as the introduction of a London Low Emission Zone and vehicle emission testing schemes; v. Measures to manage traffic demand and traffic levels, and measures to reduce vehicle speeds and thereby reduce emissions. 	Comments noted	Preferred option will be drafted to reflect comments.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 1: Improving the Use of Energy	Welcome the policy to seek improvement of the integration of land-use and transport policy, and more specifically reducing the need to travel in Option 1.1. This will help deliver Policy 4A.6 of the London Plan	Agree, comments noted.	Preferred option will be drafted to reflect comments.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 4: Air Quality	The above policy options support various other policies within the London Plan, Mayor's Air Quality Strategy and Lewisham's LDF Issues and Options Paper	Agree, comments noted.	Reference to air quality policies within the London Plan, the Mayor's Air Quality Strategy and Lewisham's AQAP.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 1: Improving the Use of Energy	Energy efficiency and sustainability principles should be encouraged within existing building stock and within new build developments	Agree, comments noted.	Preferred option will be drafted to reflect comments.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 1: Improving the Use of Energy	The listed criteria in Option 1.2 for the assessment of new building development to improve energy efficiency is welcomed. The fifth criteria should make reference to the need for natural ventilation to be sited away from heavily trafficked roads where possible, such that the criteria reads 'siting of doors and windows for natural ventilation, avoiding sites or directions close to heavily trafficked	Support welcomed	Reference to the siting of doors and windows for natural ventilation, avoiding sites or directions close to heavily trafficked roads where possible, particularly on the lower ground floors of properties to be adopted with the preferred option documents.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
				roads where possible, particularly on the lower and ground floors of properties'.		
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 1: Improving the Use of Energy	Welcome any aspect of energy policies that may be potentially beneficial to local air quality	Agree, comments noted.	Preferred option will be drafted to reflect comments.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 4: Air Quality	Option 4.1 will provide the framework to ensure air quality is taken into account at the planning application stage, ensuring air quality assessments are undertaken, particularly in relation to AQMAs and where significant impacts on local air quality are anticipated. This is consistent with the Mayor's Air Quality Strategy.	Agree, comments noted.	No changes proposed
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 4: Air Quality	A policy option to not grant planning permission unless appropriate mitigating measures are adopted is welcomed	Support welcomed	No changes proposed.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 4: Air Quality	Welcome the local authorities' objective to improve ambient air quality at those locations where air quality objectives are most likely to be exceeded in Option 4.2.	Support welcomed	No changes proposed.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 4: Air Quality	Welcome the consideration of the various criteria listed when assessing planning applications. The 'scale of emissions' referred to in the first bullet (beginning 'the severity of the impacts...') would be better referred to as 'scale of indirect and direct emissions as a result of the proposed development, taking into account cumulative impacts from committed development in the vicinity of the proposal'.	Support welcomed	Addition of 'and any local Air Quality Strategy in place'.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 5: Contaminated Land & Hazardous Substances	The criteria in Option 5.2 against which applications for polluting or potentially polluting developments are assessed is welcomed, as the policy will assist in ensuring polluting developments generally are located away from sensitive receptors.	Support welcomed	No changes proposed.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 5: Contaminated Land & Hazardous Substances	Welcome particularly the granting of time-limited permissions so as the potential impact from development can be assessed. Welcome also the adoption of a waste reduction and minimisation strategy by the applicant to account for the disposal, amongst other media, of	Support welcomed	Comments to be assessed further during the preferred options stage.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
				airborne discharges.		
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 3: Flood Risk & Climate Change	Policy 3.7 is not supported. The policy should be aimed at all developments not just those that result in a net reduction in permeability of a site.	Comments noted	Preferred option to be aimed at all developments.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 3: Flood Risk & Climate Change	Option not supported. There is no policy option requiring new development to be set back from existing flood defences to allow for the future upgrading, strengthening and maintenance of those defences in a sustainable and cost effective way. This may apply to flood defences on both the river Thames and tributary rivers within the borough.	The strategic direction will be to avoid development in areas prone to flooding. Where there is no other realistic option for sites. The Council will require a buffer zone of up to 8 metres as advised by the Environment Agency to be maintained in order to reduce any risk of flooding.	As per officer response.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 6: Water Quality, Resources & Infrastructure	Support Options 6.1 and 6.2, which are in accordance with London Plan policies.	Support welcomed	No changes proposed.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 6: Water Quality, Resources & Infrastructure	Option 6.3 is not supported. Whilst the general thrust of this policy option is supported and in line with the London Plan, it would benefit from a reference to the need for the Thames Tideway Sewer Overflow Tunnel. This project has been recommended to	Comments noted	Refer to the Thames Tideway Sewer Overflow Tunnel

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
				Government by the Thames Tideway Strategic Study and is currently awaiting approval.		
61	Peter Richardson	The Users & Friends of Manor House Library	Issue 1: Improving the Use of Energy	Insist on heat pumps, some solar water pre-heat systems in new developments	Agree, comments noted.	Guidance on the Mayors Supplementary Planning document on Sustainable Design and Construction details methods which should be encouraged in new development.
61	Peter Richardson	The Users & Friends of Manor House Library	Issue 4: Air Quality	Ban diesel engines	This option is out of the remit of the planning system	No changes proposed.
61	Peter Richardson	The Users & Friends of Manor House Library	Issue 8: Noise & Light Effects	Rail & Aircraft	Effective policies are needed to ensure buildings are well sound proofed from outside environments	As per officer response.
61	Peter Richardson	The Users & Friends of Manor House Library	Issue 8: Noise & Light Effects	Dimming	Effective policies are needed to ensure buildings are well sound proofed from outside environments	As per officer response.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
62	Fiona McNie	Environment Agency	Issue 3: Flood Risk & Climate Change	1. Development can have a significant impact on flooding simply by increasing run-off. 2. Changes of use on previously developed land can also have significant downstream impacts. 3. Locally, flooding may occur due to groundwater overflowing, overland sheet flow or run-off exceeding the capacity of piped drainage during periods of heavy or prolonged rainfall.	Agree, comments noted.	The Council will work closely with the Environment Agency to ensure that risk of river and tidal flooding in Lewisham is addressed.
62	Fiona McNie	Environment Agency	Issue 6: Water Quality, Resources & Infrastructure	Assessment of the standard of water quality should not be limited to rivers alone. The water framework directive is a major opportunity to improve the whole water environment and promote the sustainable use of water.	Agree, comments noted.	Future policy should be applicable to all water bodies within the borough.
62	Fiona McNie	Environment Agency	Issue 9: Sustainable Use of Building Materials & Aggregates	EA would like to see a dramatic increase in sustainable construction. Most local authorities seem to be using BREAM and ECOhomes standard targets, which is specifically for sustainable construction techniques.	Agree. Green roofs and Greywater will be encouraged and wildlife opportunities are already identified within the Lewisham Biodiversity Action Plan.	As per officer response.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
62	Fiona McNie	Environment Agency	Issue 1: Improving the Use of Energy	Welcome options proposed to support improved energy efficiency and agree that the major focus of future energy policy should be to reduce demand, and increase the use of renewable energy and combined heat and power plants (CHP).	Support welcomed	No changes proposed.
62	Fiona McNie	Environment Agency	Issue 1: Improving the Use of Energy	Recognise that there is a need for a "step change", high profile energy productivity programme to deliver improvements in energy efficiency and therefore agree with the assessment criteria for new developments listed in Option 1.2.	Support welcomed	No changes proposed.
62	Fiona McNie	Environment Agency	Issue 2: Providing for Renewable Energy	Support an increase in the use of renewable energy schemes with Lewisham, but only in an environmentally sensitive way. All energy sources have impacts on the environment – but of different scales and duration. Renewables can have impacts on biodiversity, landscape, transport and air quality. The challenge is to find practical ways that have less impact than the traditional fuels we currently depend on.	Support welcomed	No changes proposed.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
62	Fiona McNie	Environment Agency	Issue 2: Providing for Renewable Energy	We support the Government's Performance and Innovation Unit's (PIU) recommendation that 10% of electricity should come from renewable sources by 2010, with an increase to 20% by 2020. Agree with the requirements placed on developers for incorporating renewables into new developments contained in Options 2.1 and 2.2, but would also encourage to consider the longer term targets.	Support welcomed	No changes proposed.
62	Fiona McNie	Environment Agency	Issue 2: Providing for Renewable Energy	Agree with the criteria contained within Option 2.3.	Support welcomed	No changes proposed.
62	Fiona McNie	Environment Agency	Issue 3: Flood Risk & Climate Change	Encourage to expand to include other forms of flooding: i) Consideration of flood issues should not be confined to river and coastal flood plains. Development throughout a river catchment can have a significant impact on flooding simply by increasing run-off. All built development tends to extend the area of impermeable ground, from which the water runs off rather than percolating into the ground. This can increase both the total and peak flow from built-up areas, resulting in	Agree, comments noted.	Preferred option will be drafted to reflect comments.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
				<p>increased flows downstream and thus increasing the risk of flooding.</p> <p>ii) Changes of use on previously developed land can also have significant downstream impacts where the existing drainage system may not have the capacity or be fit to carry the additional drainage from the redevelopment without enlargement or repair.</p> <p>iii) Locally, flooding may occur due to groundwater overflowing, overland sheet flow or run-off exceeding the capacity of piped drainage during periods of heavy or prolonged rainfall.</p>		
62	Fiona McNie	Environment Agency	Issue 3: Flood Risk & Climate Change	<p>Local planning authorities should, therefore, work closely with the Environment Agency, sewerage undertakers and prospective developers to address all of these issues. For example, on projects such as a borough wide survey and assessment of existing sewerage capacity and related flood risk from overflowing sewers, to help identify areas at risk from this form of flooding</p>	Agree	<p>Lewisham will work closely with the Environment Agency, Sewerage undertakers and prospective developers to address sewerage capacity and flood risk measures.</p>

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
62	Fiona McNie	Environment Agency	Issue 4: Air Quality	Agree with the options that your authority has proposed to deal with air quality.	Support welcomed	No changes proposed.
62	Fiona McNie	Environment Agency	Issue 5: Contaminated Land & Hazardous Substances	Your authority has proposed robust options to deal with contaminated land and hazardous substances.	Support welcomed	No changes proposed.
62	Fiona McNie	Environment Agency	Issue 5: Contaminated Land & Hazardous Substances	We would welcome the inclusion of CLR11: Model Procedures for the Management of Land Contamination report to be listed as a relevant document.	Agree, comments noted.	Preferred option will be drafted to reflect comments and include CLR 11 Model procedures for the management of land in the submission document.
62	Fiona McNie	Environment Agency	Issue 5: Contaminated Land & Hazardous Substances	In addition, as "point source" pollution of water is brought increasingly under control, impacts of diffuse pollution from sources such as contaminated land will become more apparent. Continued improvement in, for example, water quality in the urban areas, will in part be dependent on managing the potential adverse impacts from large numbers of contaminated sites.	Comments noted	Preferred option will be drafted to reflect comments.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
62	Fiona McNie	Environment Agency	Issue 5: Contaminated Land & Hazardous Substances	The Kempton Park Gravels are present in the north and centre of the borough and are classified as a minor aquifer of high vulnerability. The public water supply groundwater abstraction bore hole for Deptford is also present in the borough. There is the potential for contamination of groundwater from historical land contamination. Groundwater, as well as the soil present on site, should be included in any remediation proposals. This will help to reduce the risk that contaminated sites pose to water quality.	Comments noted	preferred option will be drafted to reflect comments.
62	Fiona McNie	Environment Agency	Issue 6: Water Quality, Resources & Infrastructure	The council should take a definite pro-active approach to ensure the sustainability of water resources	Agree, the Council will actively promote, conservation and sustainable use of water resources.	As per officer response.
62	Fiona McNie	Environment Agency	Issue 6: Water Quality, Resources & Infrastructure	The assessment of the standard of water quality in Lewisham should not be limited to rivers alone. The Water Framework Directive is a major opportunity to improve the whole water environment and promote the sustainable use of water for the benefit of	Agree, comments noted.	Incorporate the objectives of the Water Framework Directive in the preferred options documents

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
				people and wildlife alike.		
62	Fiona McNie	Environment Agency	Issue 6: Water Quality, Resources & Infrastructure	Key policy issues, such as the control of diffuse water pollution, land-use planning, the designation of heavily modified water bodies and the role of wetlands in the Directive must be addressed by relevant authorities	Agree	Incorporate the objectives of the Water Framework Directive in the preferred options documents
62	Fiona McNie	Environment Agency	Issue 9: Sustainable Use of Building Materials & Aggregates	Most local authorities seem to be using BREAM and ECOhomes standard targets, which is specifically for sustainable construction techniques. Construction/ Development should also be encouraged to build environmental enhancements in to new designs. The Environment Agency would like to see an increase in Green Roofs, Grey Water Systems, opportunities for wildlife such as bat boxes, and use of sustainable energy.	Agree, comments noted.	The preferred options document will be drafted to reflect comments.

WASTE MANAGEMENT

LIST OF RESPONDENTS FOR **WASTE MANAGEMENT** ISSUES AND OPTIONS CONSULTATION

RESPONDENTS IDENTIFICATION NUMBER	RESPONDENT
2	Anonymous
7	Councillor Ingleby, London Borough of Lewisham
9	Grove Park Community Group, 268 Baring Road
13	James Amos, Hephher Dixon
18	Alona Sheridan, Sydenham Society
26	Anonymous
32	Donna Carr, Directorate of Public Health
39	Andrew Reid, on behalf of Tewkesbury Lodge Estate
47	Fairview Homes C/O RPS Planning
55	Paula Carney, RPS Planning
56	Jonathan Sheldon, House Builders Federation
59	Susan Gore, Ladywell Society
60	Giles Dolphin, Greater London Authority, Policy & Partnerships Directorate
61	Peter Richardson, The Users & Friends of Manor House Library

Schedule of Representations

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
2	Anonymous		Q10 (Other Issues)	Should introduce recycling. i.e. In Greenwich	Comments noted	Preferred option will be drafted to reflect comments.
2	Anonymous		Q12 (Views)	Add Opt 4.3	Comments noted	Preferred option will be drafted to reflect comments.
7	Councillor Ingleby	London Borough of Lewisham	Issue 2: Provision of New Waste Management Sites	Green boxes are better.	Comments noted	Preferred option will be drafted to reflect comments.
7	Councillor Ingleby	London Borough of Lewisham	Issue 3: Protection of Existing Waste Management Sites	Why bring points? When green boxes/kerb-side collection is the focus?	This enables large quantities of recyclable material to be collected at any one time	No changes proposed.
9	Grove Park Community Group	268 Baring Road	Issue 2: Provision of New Waste Management Sites	Sites of nature conservation should not be suitable.	Agree, comments noted.	No protected open spaces will be included in the criteria for selecting a suitable waste management site.
9	Grove Park Community Group	268 Baring Road	Issue 2: Provision of New Waste Management Sites	Screening, cleanliness & more frequent emptying	Agree	Preferred option documents will be drafted to reflect comments.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
9	Grove Park Community Group	268 Baring Road	Other Comments	All "bring points" should be screened from public view.	Agree	The installation of bring points will need to coexist within the fabric of the public realm. Screening of these bring points will be encouraged.
13	James Amos	Hepher Dixon	Issue 2: Provision of New Waste Management Sites	A site on publicly owned land should be identified. Preferred employment locations in private ownership should be protected for employment or mixed uses.	The identification of sites within the LDF does not preclude further sites outside of the LDF coming forward.	No changes proposed.
13	James Amos	Hepher Dixon	Issue 4: Standards for Waste Storage & Recycling	The need for refuse facilities is most pressing in flatted developments. The Draft policy should reflect this.	The need for refuse facilities is needed in all developments regardless of its use.	No changes proposed.
13	James Amos	Hepher Dixon	Comments	As in the adopted UDP, Preferred Employment Locations should be reserved for employment generating uses and in some cases mixed uses and should not be allocated for a waste management centre.	Agree, however all non residential locations should be explored.	No changes proposed.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
18	Alona Sheridan	Sydenham Society	Issue 1: Waste Reduction	Develop site for commercial composting	Some developments may be able to recycle green waste on site.	Preferred option will be drafted to reflect comments.
18	Alona Sheridan	Sydenham Society	Issue 2: Provision of New Waste Management Sites	Should avoid new additional waste management facility.	The Council has identified that our existing facilities can cope with the demand beyond the plan period, however should there be an overwhelming need for a new establishment then identification of a site early on will help towards securing a site.	Preferred option will be drafted to reflect comments.
26	Anonymous		Q10 (Other Issues)	Aesthetics. All waste collection arrangements in Lewisham are torrid. Probably because not thought through from central to local govt.	Comments noted.	As per officer response.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
26	Anonymous		Q12 (Views)	Management & design of waste system is not addressed	This is set out in PPS 10 and is therefore not needed within the text.	No changes proposed.
32	Donna Carr	Public Health Programmes Manager, Director of Public Health	Comments	Waste treatment can give rise to health issue – of particular concern sure the facilities for high density housing and their proper management. Storage facilities within dwelling should be hygienic. High rates of recycling are good for the environment and community.	The Council will endeavour to ensure that any waste development in the borough has the highest level of safety for the community and its environment.	Preferred option documents will be drafted to reflect comments.
32	Donna Carr	Public Health Programmes Manager, Director of Public Health	Main Issues raised	Waste treatment can give rise to health issue – of particular concern sure the facilities for high density housing and their proper management. Storage facilities within dwelling should be hygienic. High rates of recycling are good for the environment and community.	Agree, comments noted.	Preferred option will be drafted to reflect comments.
39	Andrew Reid	Tewkesbury Lodge Estate	Issue 1: Waste Reduction	Planning/Building control should favour local recycling of grey/rain water	Agree, comments noted.	Preferred option will be drafted to reflect comments.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
39	Andrew Reid	Tewkesbury Lodge Estate	Issue 2: Provision of New Waste Management Sites	Combine criteria 2.3 & 2.4	Comments noted	Preferred option documents will be drafted to reflect comments.
39	Andrew Reid	Tewkesbury Lodge Estate	Issue 3: Protection of Existing Waste Management Sites	Encourage private waste management	Comments noted	Private waste management will be encouraged.
39	Andrew Reid	Tewkesbury Lodge Estate	Issue 4: Standards for Waste Storage & Recycling	5+ Units or more	Comments noted	Preferred option documents will be drafted to reflect comments.
39	Andrew Reid	Tewkesbury Lodge Estate	Issue 4: Standards for Waste Storage & Recycling	Every development should provide waste storage	Comments noted	
39	Andrew Reid	Tewkesbury Lodge Estate	Other Comments	Paper needs to define term 'municipal waste'. Assume it's household waste plus all other waste (trade, street etc) but from chart on p4 it looks like additional waste stream bigger than household waste.? Option 2.1 refers to W2 & 3.2 to W5. Need to be amended. 'Evidence base' should include forecasts and targets to justify options.	Agree, comments noted.	Preferred option documents will be drafted to reflect comments.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
47	Fairview Homes C/O RPS Planning	Fairview Homes C/O RPS Planning	Issue 4: Standards for Waste Storage & Recycling	Object to Option 4.1 and 4.2, which requires all new residential developments (5 or 15 units or more) to incorporate adequate waste storage and recycling facilities.	Disagree. This requirement seeks to reduce the amount of waste that is land filled and increase the amount of recycled materials.	As per officer response.
47	Fairview Homes C/O RPS Planning	Fairview Homes C/O RPS Planning	Issue 4: Standards for Waste Storage & Recycling	Request that waste storage and recycling facilities are only required for schemes in excess of 50 units	Disagree. This requirement seeks to reduce the amount of waste that is land filled and increase the amount of recycled materials.	As per officer response.
55	Paula Carney	RPS Planning	Comments	We support the incorporation of sustainable waste management principles into new developments.	Support welcomed	No changes proposed.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
55	Paula Carney	RPS Planning	Comments	<p>Important that sufficient waste management sites are provided within the Borough. However, the provision of such sites should be considered carefully, so that they are provided in appropriate locations, having regard to making the best use of urban land throughout the Borough as a whole. For example, if a waste site is sterilising the efficient development of other sites within an area, there should be a strategy for the relocation of the waste management site to a more appropriate location, in the interests of the proper planning of the area.</p>	Agree, comments noted.	Preferred option documents will be drafted to reflect comments.
56	Jonathan Sheldon	House Builders Federation	Issue 1: Waste Reduction	<p>Council planning process cannot do much more, but Council needs to educate & encourage individuals to recycle & reduce the waste they generate.</p>	Agree, comments noted.	Preferred option documents will be drafted to reflect comments.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
59	Sue Gore	Ladywell Society	Issue 1: Waste Reduction	All new retail developments to be compelled to incorporate recycling facilities for themselves and customers...	Many large retailers provide some form of recycling facility for staff and its customers. Recycling will be encouraged across all large developments to recognise its strategic importance in creating a sustainable community.	Preferred option documents will be drafted to reflect comments.
59	Sue Gore	Ladywell Society	Issue 2: Provision of New Waste Management Sites	Bell Green for Sydenham and Forest Hill.	Bell Green currently accommodates large retail units and could possibly become a Waste management site.	As per officer response.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
59	Sue Gore	Ladywell Society	Issue 2: Provision of New Waste Management Sites	New schools inappropriate given the problems with traffic.	It is not envisaged that any new waste site would be located near or next to a school.	As per officer response.
59	Sue Gore	Ladywell Society	Issue 3: Protection of Existing Waste Management Sites	The statements in 3.1 & 3.2 appear the same and the intentions are not clear.	The statement is derived from national policy which doesn't make clear whether the policy applies to government owned waste management facilities or privately owned waste management facilities. For the avoidance of doubt, the policy will apply to all waste management sites.	As per officer response.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 1:Waste reduction	Option 1.1 should read: "All planning applications will be assessed to consider what practical steps can be taken to apply options at the top of the waste hierarchy."	Agree, comments noted.	Preferred options to include: " All planning applications will be assessed to consider what practical steps can be taken to apply options at the top of the waste hierarchy."
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 3: Protection of Existing Waste Management Sites	The text should describe more fully the contribution that waste facilities dealing with construction and demolition and commercial and industrial waste. The GLA database indicates that there are some significant facilities located in Lewisham other than SELCHP and the Landmann Way Site.	Comments noted.	To be assessed further during the preferred options stage.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 2: Provision of New Waste Management Sites	Option 2.2 is preferred as it gives the greatest scope site searches. It should be noted that the concept of BPEO has been discarded. PPS10 makes it clear that a plan led approach is required.	Agree, comments noted.	Preferred option will be drafted to reflect comments.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 2: Provision of New Waste Management Sites	Option 2.4 will not comply with the London Plan. Smaller bring sites will generate recyclables that requires sorting or bulking.	Comments noted	This option will not be pursued.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 3: Protection of Existing Waste Management Sites	Option 3.1 is preferred as it is the only one that is in general conformity with the London Plan.	Support welcomed	Preferred option will be drafted to reflect comments.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 3: Protection of Existing Waste Management Sites	Option 3.2 will not comply with the London Plan. All waste sites are required to be safeguarded, and not just municipal sites.	Agree	Preferred option will be drafted to reflect comments.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 4: Standards for Waste Storage & Recycling	Neither Option 4.1 nor 4.2 are in general conformity with the London Plan. An approach not tested that would reflect the requirement of London Plan Policy 4.2A would be that recycling and storage facilities are required in all new developments.	Agree, comments noted.	Preferred option will be drafted to reflect comments.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 4: Standards for Waste Storage & Recycling	Option 4.3 should be a stand-alone option and is supported.	Support welcomed	No changes proposed.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 1: Waste Reduction	The evidence base should provide data on waste arising for all waste streams i.e. municipal, commercial and industrial and construction and demolition.	Agree, comments noted.	Preferred option will be drafted to reflect comments.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 2: Provision of New Waste Management Sites	There is a contradiction in the recycling rate in Lewisham. The figure is quoted as 8% and 7%	Agree, comments noted.	Preferred option will be drafted to reflect comments.
60	Giles Dolphin	Greater London Authority, Policy & Partnerships Directorate	Issue 2: Provision of New Waste Management Sites	The waste hierarchy should reflect that expressed in policy 4A.1	Agree, comments noted.	Preferred option will be drafted to reflect comments.
61	Peter Richardson	The Users & Friends of Manor House Library	Issue 2: Provision of New Waste Management Sites	Keep them away from red yellow lines, provide access by car	This suggestion is out of the remit of the planning system.	No changes proposed.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
61	Peter Richardson	The Users & Friends of Manor House Library	Issue 3: Protection of Existing Waste Management Sites	Take a local initiative, do not follow the top down approach.	Comments noted. The Local Development Framework seeks to take on board comments from the local community and comply with regional and central guidance. Any approach must be realistic and achievable.	No changes proposed.

Next Stage

The next stage in preparing the Local Development Framework For Lewisham is the preparation and publication of Councils 'Preferred Options'. These 'Preferred Options' will be prepared taking into account the comments received as a response to the Issues and Options consultation undertaken, as summarised in this document. The 'Preferred Options' will also be public exhibited for comment for 6 weeks and this is expected to be undertaken in the Spring of 2007.

APPENDIX 1. Summary of Planning Focus Meetings

MEETING WITH DEPTFORD BUSINESS GROUP

23 August 2005

Deptford Station:

- *Redevelopment and refurbishment of the entrance taking place which will enhance the listed arches structure/ramp and provide retail outlets within the arches structures. A public space will also be created as part of this redevelopment of the ramp area. It is anticipated that they will start on site early next year.*
- *Any expression of interest in these arches should be made to Jennifer Taylor who will then be able to forward the details to the Developer who succeeds the tendering process for the development.*

Local Development Framework:

- *The comment was made that the ward name of Evelyn should be changed to Deptford.*
- *Currently most of the High Street is open 7 days a week with most of the businesses being family businesses and without a regular wage, i.e. most businesses are marginal in economic viability terms.*
- *While convenience shopping draws people to the High Street, there is concern that people from the new developments are not using the High Street.*
- *Concerns were raised about the number of betting shops which are going into the High Street, especially the loss of the Gallery/café to yet another betting shop. The number of 'Pound shops' was also raised as a concern, i.e. the variety of shops on offer needs to be extended.*
- *Control over the refurbishment of the arches at the station will enable some control over the types of retail outlets which will establish in the area. It is hoped that businesses such as an art supply shop and stationers may be successful.*
- *It was stated that at present there are no vacant shops on the High Street and with good competition it means that the rents have been slowly increasing. Also it was suggested that when any vacancies do arise they are then let within families. This is then 'contributing' to the fact that it is difficult to get other shops into the High Street, when the shops are let within families and therefore there is little different in the way of retail provision.*
- *It was suggested that to address this the Council should buy up premises, food shops etc and replace them with other book shops or stationers.*
- *New Cross/ Deptford /Greenwich have been identified as a creative industry hub by the London Development Agency. The area contains Goldsmiths, Trinity College of Music, the Laban centre etc.*
- *There could also be subsidized space for Art? Answer is in market? There are several creative groups within the Lewisham area. Could higher value residential development on employment land assist with this by subsidizing employment space.*
- *There must be life around the station; New people will come in and look at what people are around - this will dictate your offerings accordingly. "The big chance is the refurbishment of the arches" e.g. a need for deli, drugstore, stationers, post office, bookshop, music shop (i.e. Virgin).*
- *Some of the attendees felt that Deptford High Street will remain the same as people will stay in Convoys and stay in Seagers and not utilize the shops within the High Street. There is a need to take action to attract new residents to the shops.*
- *55 Years ago the Deptford High Street was better as it had various shops, but when the Lewisham centre was built they relocated to Lewisham and the area declined. Then flats were built in Evelyn Street and more disruptive families moved in. While things have improved in recent years, there is still a need to improve the infrastructure around Griffin Street.*

- *Art work on stalls and the station can enhance the area – maybe more like Portobello, Camden markets to make a new style of Deptford, needs something ‘extra’.*
- *There is a need to think about what attracts creative industry – too many chain stores would drive them away. ‘you don’t want to a clone town’. There needs to be a mix of shops. Currently there are no sports shops in the area.*
- *Is Deptford to compete with Lewisham or is it an entirely different offer?*
- *Creative hub – there needs to be an incubator funded by the state – a market or festival will not do it.*
- *Let people at the rail station know where the Cuckpit Arts centre is located. JT advised that there is a signage strategy which is currently being produced and will be released/ implemented in the coming weeks.*
- *There seems to be demand for creative business premises close to the High Street out of the way of things it’s not so popular.*
- *Better crossing on Deptford Broadway as well as signage at the stations would help to direct people to some of the creative shops.*
- *The suggestion was made about local artists using the station as a mural area to encourage people to attend the Cuckpit Arts Centre. This should be undertaken in the near future and not in 2 years time. The suggestion was also made that this should be considered as part of the works which will be occurring as part of the station redevelopment. This could involve a location map of where the art centre is in relation to the station.*

Main Points:

- *Concerns have been raised over the marginal viability of the shops.*
- *Concerns have been raised over the lack of variety of the shops within the centre. However, caution has been noted that any ‘mainstream diversity’ is likely to deter the creative element from settling in the area. How do we attract diversity in an independent way?*
- *Deptford has a local strength as a creative hub at the moment and there is general interest in maintaining and enhancing this whilst encouraging people to the centre.*
- *There has recently been some significant developments occurring in the area, however, there is concern as these residents are not using the district centre for their needs. This is likely to be due to a lack of variety of goods and services in the centre.*
- *Redevelopment of the train station is keen as a gateway for attracting the ‘new people’ to the centre. Deptford is still in the process of shaking off some negative image problems and needs to appear more attractive, inviting and easy to navigate. A short term suggestion was to paint etc the hoardings while the refurbishment/ redevelopment is taking place. This can inform people as to what is happening in the area as well as promoting local artists and wares. This could help to make the area more inviting and for people to be aware as to what is available in the area.*

MEETING WITH FOCAS – CONSERVATION & AMENITY GROUPS

17 October 2005

- *Helen Pink requested an explanation of the issue of planning gain – Grove Park Community Group were concerned that it sort of sounded corrupt – selling permissions.*
- *Brian Regan explained that a new Planning Circular has suggested a new tax on housing and abolishes S 106 agreements.*
- *Pete Smith emphasised that planning gain needs to be NECESSARY for the development to take place, and that there will have to be TRANSPARENCY in the use of the money. Mechanisms are being set up for Planning Service acting as the Local Planning Authority as Gatekeeper to ensure that the funding is used by the rest of the Council for the purpose for which it was intended.*
- *Helen Pink commented that the facilities that should be provided as part of new housing development in the context of an 11,000 target never seem to keep up and are never provided.*
- *Brian Regan agreed to send John Fox a copy of the new Circular.*

- *Henry D'Alorto asked how the new S106 would be scrutinised – he knew that in the past they had been over ridden and ignored e.g. the traffic lights at Grove Park. He had no confidence in the system.*
- *Pete Smith said that in the future a group of officers will be looking after S106 money and they are all publicly available on the Register.*
- *Charles Batchelor commented that many of the options were not really options at all and that he had been faced with an unformulated mass of statements.*
- *Many present said that the feeling from the Issues and Options papers was that Lewisham was faced with a set of impossibilities and where would the 11,000 new build target go? What about empty Homes? (Pat Trembath).*
- *Henry D'Alorto said that according to the Government any company that employs fewer than 5 people is not significant. On these sites housing is more suitable. Lewisham is in a good position for employment on the edge of the City and close to Canary Wharf. We should therefore put hundreds of the housing units on the employment land with low levels of employment. Lewisham has as much employment land as we can sustain – therefore we should lost some of it. There also appeared to be no logic in past planning decisions which has seen some relatively high employment sites lost and some larger low employment sites defended.*
- *Bill Elson said that the south of the borough is largely suburban and people tend to commute. In Deptford many people work locally for small employers. We do not want to lose these sites.*
- *Sue Gore said that the provision of amenities is not considered not the cumulative impact in the area including health and play facilities etc.*
- *Pete Smith said that this was covered by the new circular.*
- *John Fox said that we should be protesting to the government about the new targets – what can we do about it, lobbying MPs etc. How can we get public representatives to state their views on this? – we explained about appeals and inspectors etc.*
- *Pete also added that the Council is working with the Health Authority on provision.*
- *Charles Batchelor asked whether the conservation areas would be undermined and weakened by the process.*
- *Said that Option U3 does not mention character appraisals for Conservation Areas.*
- *Henry D'Alorto said that he was surprised that a piece of Metropolitan Open Land (Allotments at Hoser Avenue) was being put forward in the Site Allocations Paper. There is a list of covenants protecting the site. Also the Council is committed to a target of providing x amount of MOL per 1000 population – building here would mean that target would be even further from being met.*
- *Brian Regan explained the consultation process and that it was the developer who has put this site forward. Consultation responses were requested now on this site and all the sites put forward in the Site Allocations document.*
- *Pete Smith requested comments on the Employment Land Paper (live/work aspects etc.)*
- *Henry D'Alorto requested an explanation of the new powers of the Council under the new Compulsory Purchase Act.*

MEETING WITH FAITH GROUPS

16 November 2005

Ray Hall - Representing Churches together in Lewisham

Comments on the proposed developments in Lewisham Town Centre:

- *The new development should capitalise on the character of Lewisham, which comprises three market towns in a valley surrounded by hills and be of an iconic nature currently lacking for Lewisham.*
- *The opens paces and parks on the hills used to be gathering places for entertainment because of the views. The big iconic attraction of Lewisham in the hills, viewpoints and valleys. The Thames itself is of limited interest for Lewisham.*
- *A fundamental error has been made in the Lewisham Gateway project by not recognising this character of Lewisham, as is the transport node 'low H'.*

- *The opportunity to shape a place at a crucial node of rail and water, valleys and hills is not being taken.*
- *The opportunity should be taken to create an identity 'the People's Crown' - needs to reflect all communities in Lewisham.*
- *It should be a 'gathering place' and generate a sense of place on foot in order to put the Town Centre on the global map for all the 'global people' we have here. The Christian community is worldwide - people from Africa etc trading and employing. The rest of the world should get to know Lewisham as a centre for the global nature of the relationship with the spiritual.*
- *The roundabout could be an asset, and create a bigger sense of place as a point between the transport nodes.*
- *The current scheme is too politically driven and controlled, with an underlying policy of creating high density housing which is not able to generate employment - Lewisham takes the attitude that we export people from the borough to work elsewhere, with a residential character to the borough rather than to create a local economy.*
- *There is insufficient business representation on the Lewisham Strategic Partnership.*
- *The Council is also losing money by this development. The Council's land asset the old Odeon Cinema and Runnel Street will be wasted. These sites have a relatively high land value which is being thrown into the 'low h' which is funding infrastructure only. The site could be developed in an iconic way to become a genuine community asset and put Lewisham Town Centre on the map.*
- *No money has ever been spent on the market - it needs to be enhanced for the people and the businesses involved. We could re-position the community on the world stage.*
- *The project will involve a lot of disruption on top of the seven years traders went through (some to bankruptcy or near bankruptcy) as part of the Lewisham 2000 project.*

Judith Seymour – Crofton Park Baptist Church

- *One of the first points which was raised was a concern for speaking up for the silent majority, which sometimes may not be heard over the vocal minority. The Crofton Park Baptist Church has seen itself as having a voice for the voiceless.*
- *Specific issues relating to their church site (Crofton Park Baptist Church). This includes desperately needed road repair works to Huxbear Street (an unadopted road). There is also a need to better pedestrian facilities along Brockley Grove across Huxbear Street entrance as large puddles accumulate during wet weather forcing pedestrians to walk into the oncoming traffic of Brockley Grove.*
- *While there has been instances of crime, particularly graffiti and anti-social behaviour around the back of the church and it's buildings they have attempted to include the youth in their activities and tried to get to understand them.*
- *When asked what she thought that the Council could do to improve things, the comment was made that they support the recycling and other environmental initiatives within the Borough, however, concerns were raised that even as a Church they are charged for rubbish collection and having to pay commercial rates. Notes were also made that a blue bin has been taken from the Brockley Grove bus shelter near the church.*
- *There were several other general points which were made around the protection of public open space and enabling flexibility for shop uses in areas where the shops have been vacant for some time.*

Graham Trice – College Park Baptist Church

Church site:

- *Subject Church site requires no further expansion.*
- *Small Church car park included in the site (approx 7 car parks). Currently is being abused by local shoppers.*
- *Poor security for the car park - Would welcome CCTV security.*
- *Council car park adjacent. Would resist change of use for this car park.*
- *CPZ operates in the street.*
- *Any growth in church members can be accommodated within the site*

General:

- *Need additional community space - e.g. rooms available for hire by faith groups.*
- *Recognised that faith groups only utilise community resources (i.e. centres) for a small period of time. Sharing of centres with other groups (i.e. elderly) would be more efficient use of resources.*
- *Recognised that existing transport networks, especially buses are important to faith groups.*
- *Churches are affected by parking restrictions, especially on Sundays and for mid-week funerals. Suggested that CPZ exemption be granted for funerals, with notice to Council.*

MEETING WITH LEWISHAM DISABILITY COALITION

12 December 2006

Dropped Kerbs

- *Following works in Lewisham High Street the dropped kerbs outside the Lewisham Library have been moved. A cycle path and a bus lane has been constructed, and now the only crossing points for buggies and wheelchairs is at MacDonald's.*
- *Transport for London have not responded to requests for changes to this.*

Car Parking:

- *Questioned whether proposed standards for car parking spaces for residential development would be sufficient for wheelchair users – included requirements for getting out at the side of cars and potentially from the rear for some car designs.*
- *Pointed out the car parking bays on Molesworth Street do not meet the requirements of wheelchair users as they are not very large and you have to open doors into traffic.*
- *Public pathways are very often not suitable for the wheelchair user – so it is not possible to get to the new bendy buses (or any other buses for that matter).*
- *Advised that they could comment that streetscape and parking is not included in the Local Development Framework and a Supplementary Planning Document could be done (perhaps to update or complement the Lewisham Streetscape guide done by highways?)*
- *Advised that disabled people are not allowed to park in Controlled Parking Zones. –s this true, is some explanation required.*

Paving:

- *Tactile paving was universally disliked by all people with mobility difficulties. – dangerous if you are dodgy on your feet, mother of babies curse it, the elderly, whose balance is not too good cant pick their heels up properly.*
- *Advised that ribbed paving rather than knobbly paving would be better.*
- *Agreed that all homes should be to lifetime standard but with a threshold for requiring a percentage of wheelchair housing.*
- *Reported that placing documents on the council website is inadequate for ordinary computer users (presumably non broad band). The documents simply often do not respond and refuse to be opened.*
- *Stated however that wheelchair housing should not be provided in ghetto developments – this has the effect of singling people out and making them vulnerable to harassment.*

Shop fronts:

- *Advised that a Supplementary Planning Document on this is under preparation that may not have particularly taken on board – such as doors that are too heavy and which open outwards and also sloping ramps that are too difficult to negotiate in combination with an awkward door*
- *Planning officers undertook to refer this problem to the planning officers who were preparing the guidance.*

MEETING WITH MAYOR'S COMMISSION DEVELOPING A SUSTAINABLE ENVIRONMENT

27TH November 2006

- Malcolm Smith outlined the background to the LDF. The requirement to bring this framework into force has been introduced by the government and will replace the Unitary Development Plan (UDP) as the overarching planning strategy for local authorities.
- MS informed that commission that the intention from government was to offer more flexibility within the planning and development process. The reality of this intention would be seen in the future.
- MS then moved on to his presentation and highlighted the different elements comprising the LDF. MS informed the commission that of key importance is the spatial (core) strategy.
- This document will set out the key elements of the planning framework and will comprise a vision and objectives for the area along with a spatial strategy, core policies and a monitoring and implementation framework. It will also include broad development control criteria against which all planning applications will be judged.
- MS then outlined some of the key issues that the draft spatial strategy needed to address:
 - Population is predicted to grow by about 25,000 between 2001-2016
 - New homes to increase by 10,000 between 2006-16
 - Parts of the borough have a poor environment. Fear of crime issues are a major concern for residents
 - But there are also 25 conservation areas and 560 ha of open space together with well established residential areas
 - There is a shortage of business accommodation and low level of investment in employment sites.
- MS reported that the proposed approach identifies a major growth corridor for Catford, Lewisham, Deptford and New Cross.
- MS then outlined the draft policies for sustainable environment and waste. These policies concern:
 - sustainable construction and renewable energy
 - stand alone and roof mounted renewable energy
 - river water quality and water resources
 - flood risk and sustainable urban drainage systems (SUDS)
 - the requirement for an air quality assessment
 - development on contaminated land
 - noise and vibration and light attenuation
 - construction waste and aggregates and construction materials
 - provision of new waste management sites and protection of existing waste management sites
 - residential waste management facilities
 - commercial/large scale development waste management facilities
 - living roofs for biodiversity
- MS then talked about the intended plans for Lewisham Town Centre and Catford Town Centre; outlined the North Lewisham Masterplan and discussed the sustainability aspects of the proposed Convoys Wharf development. MS then concluded the presentation with a look at examples of place making in town centres and around transport nodes.
- MS noted that many of the development sites and intentions fall under the remit of the private sector. However MS reminded the commission of the major infrastructure projects that take their lead from the council, specifically Building Schools for the Future (BSF) and the Decent Homes Standard (DHS). MS noted that there was major role here for the council to expect sustainable standards to be employed in both these schemes.

- The Chair thanked MS for the presentation and asked the commission for any comments or questions.
- SW began the discussions by describing an excellent example of local place making and how it had been achieved. The changes to Forest Hill had started a number of years ago on a small scale through discussions between local residents and councillors. With major stakeholders such as Sainsbury's investing in a new store, real change has taken place in the local area. The real catalyst, SW suggested, had been partnership working at the local level.
- Addressing the issue of place making around transport nodes, SW also pointed out that the extension of the East London Line should be an excellent opportunity for the local area. SW pointed out that she felt that transport and travel are key factors both in relation to place shaping, as well as in terms of sustainability in a general sense.
- MS agreed that a key role for any local authority in these areas was around influence and advocacy. MS reiterated the fact that the LDF will not be a solution to place making or increased development. Moreover it would be an added tool in the influence local authorities could exert.
- RS then asked about how much scope, generally and in respect of the LDF, there was for the council to:
 - promote a zero-carbon development
 - develop the local green economy
 - use Brownfield sites to increase bio-diversity
- MS responded that in terms of developing the local green economy, Convoys Wharf would offer an exciting opportunity in this regard, given the sustainable business park proposals.
- In respect of Brownfield sites, MS noted that the bio-diversity potential of Brownfield land often depends upon the length of time that land has been vacant. Where a major bio-diversity interest could be argued, Section 106 negotiations with developers ought to allow for some form of accommodation/protection.
- MS noted that the specification role of the Section 106 also provided the authority with the means to express a preference for locally sourced labourers. MS noted that EU law restricts strict local workforce recruitment but that the Section 106 could determine the tone and expectations of a development.
- BR explained that the Convoy's Wharf development is already committed to be an example of sustainable development and will, for example, incorporate a new recycling centre.
- RH pointed out that in relation to zero-carbon developments, these would only occur if land was to be sold at lower rates.
- Continuing the theme, HA asked if LBL could sell unoccupied land at a lower rate on the proviso that developers ensured the development was carbon neutral.
- Steve Gough, Director of Programme Management and Property, said that this was possible in theory, however there were significant issues around the issue of subsidy. SG reiterated that the council's primary role was as an influencer.
- MS suggested that the fact that zero energy developments were not more prevalent implied that either they didn't work, or that they hadn't been tried enough.
- HA said that a reason there wasn't more on-site renewable energy generation could be due to fact that developers felt the infrastructural costs would be too expensive. However if an incentive were to be given to developers, could such a development be more feasible?
- RB said it was important to get to grips with what we really mean when we talk of zero energy developments. If we mean requiring developments to install onsite generation from renewable sources, then this is potentially a very expensive consideration for developers and may therefore be a disincentive. If what we mean is 'low carbon living' in the round (i.e. behavioural change), then this is potentially easier to achieve. RB used the example of 'green travel' as an example of low carbon living – a zero energy / carbon development might be one which is 'car free'; thus encouraging walking to school for example.

- RS reiterated this point and used the example of Bed ZED to illustrate how lifestyle changes (in travel, eating, leisure for example) can have a marked impact in relation to carbon reduction.
- MS said that these were interesting points of discussion. In the context of discussions around development however, they again highlighted issues (behavioural change for example) that the LDF can't influence.
- TL pointed out that a non-traditional approach could see the authority offering sites for competition. This would perhaps obviate some of the more obvious difficulties of disincentivising developers through too onerous requirements. These issues were still being deliberated and discussed within the traditional local authority.
- BE made the distinction between private and council land. BE again highlighted the council's role as an influencer in these debates and used the example of Camden in this regard; the borough has relatively large amounts of car-free areas because 90% of the borough comes under Controlled Parking Zones (CPZs). BE further noted that the issues of transport and travel, in a general sense, were key issues in relation in the development of a sustainable environment.
- Going back to earlier discussions about employment, BE suggested that there is role for everyone to play in challenging perceived orthodoxies – one of these is 'commuting is the normal thing to do'.
- Finally and in relation to local development, BE suggested that a key sustainable action for local authorities should be to maximise use of space. In this regard, BE said that there was a high level of unused space above shops in Catford.
- SW pointed out the council had recently been doing a lot of work developing space above shops across the borough – a good example was Honor Oak.
- Returning to the issue of zero energy development, RB suggested that there needed to be a holistic approach in addressing this issue. There needed to be clarity on what role the London Borough of Lewisham could play in generating low carbon construction and low carbon living.
- BE stated that planning control did have a part to play, but RB suggested it wasn't simply a single area where influence could be exerted. Moreover, the issue is how this commission can work with LBL to establish a course of action – what can we and cant we do.
- MS agreed with this notion and used the example of Lordship Lane in East Dulwich as an example of a local authority using their influence. Despite local objections, the London Borough of Southwark agreed to the planning application submitted by Sainsbury's for a large development near Lordship Lane. LBS took a decision because they thought Lordship Lane would benefit economically – this decision had been proved correct. An added issue here was that this hadn't been achieved through subsidy. MS stated that It is the market, not a local authority, that creates jobs.
- SW agreed that the changes in Lordship Lane had been noticeable. However they had taken 15 years to come to fruition, and a shift in demography should also be taken into account when analysing the turnaround of the area.
- **ACTION: Commission to further investigate the issue of zero carbon development - to include an identification of LBL-owned sites which might be relevant to this debate – while noting that the LDF, as a planning framework, is limited in the influence it has in respect of 'behavioural' change – a key point in the discussions in relation zero energy / carbon development.**
- **Officers to bring back to a future Commission meeting an analysis of the scope of the role of the LBL in generating low carbon construction and low carbon living.**
- The Chair then moved the discussion on to the issue of housing and suggested that the LDF should be a framework which at least makes reference to the fact that, in relation to affordable housing, one or two bedroom units are not always the answer to housing need. Sustainability, if taken in the round, needs to include how the issue of housing is tackled. While it is important to be judged on the percentage of renewables used in major developments, it is equally important to ensure that we discuss issues of housing.
- BR, informed the commission that the LDF will require private developers to ensure that all developments over 10 units have 35% affordable housing included in the plans. BR indicated that the policy used to be for developments over 15 units. BR further pointed

out that the Mayor of London wanted the percentage of affordable housing in new developments to be 50% - however, the general consensus is that this is not achievable at present in Lewisham.

- In relation to the issue of unit size, BR stated that 92% of new builds are likely to be one and two bedroom units. However, this is in line with predicted increases in the population of one parents households and is therefore not altogether surprising.
- **ACTION:** In relation to the LDF, the Commission agreed to monitor the progression of the LDF process, both in a micro sense (e.g. renewable energy targets) and on the macro level (e.g. housing need).