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Lewisham Planning Obligations: Supplementary Planning Document

Consultation Statement in relation to draft  
Planning Obligations SPD consultation  
October – November 2014

Planning Policy Team  
14<sup>th</sup> January 2015



## Introduction

The Council intends to introduce a Community Infrastructure Levy (CIL) Charging Schedule with effect from 1<sup>st</sup> April 2015. Under Regulation 123 of the CIL Regulations 2010 (as amended) the use of Planning Obligations to deliver infrastructure will be restricted from April 2015, whether or not the Council has adopted a CIL. It was therefore necessary to update the existing Planning Obligations SPD adopted in 2011 to take into account the implications of CIL.

The consultation on the draft SPD ran for 6 weeks from Friday 10 October 2014 to Friday 21 November 2014. All those on the Planning Policy database for consultation, which is over 1,000 individuals, business and other organisations, were consulted. In addition an advert was placed in the South London Press and copies of the consultation draft were placed in all the borough libraries.

In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 the Council has produced this Consultation Statement. It sets out:

A summary of the main issue raised by those responding to the consultation and how those issues have been addressed in the preparation of the final SPD for adoption, (appendix 1);

The persons the local planning authority consulted when preparing the draft supplementary planning document (appendix 2).

**Appendix 1: Consultation Report - Summary of issues raised, responses made and changes to Draft SPD arising from consultation on draft Planning Obligations Supplementary Planning Document - October-November 2014**

Summary of Issue Raised	Council's Response	Actions Arising
<b>1. Transport For London (TfL)</b>		
<p>1.1 TfL welcomes the approach adopted of explaining how obligations will be sought for site-specific transport infrastructure. That the draft SPD makes it clear the borough (and Mayoral) community infrastructure levy (CIL) will separately fund strategic transport across the borough, (and London). The draft clearly shows developers what is expected after the borough CIL is introduced.</p>	Support noted	No action required
<p>1.2 Support paragraph 3.5.16, as it makes clear that TfL may have requirements for mitigation measures over and above the Council's.</p>	Support noted	No action required
<p>1.3 It would be useful to include specific reference to bus service capacity enhancements, so we suggest the following addition show in capitals in paragraph 3.5.13 (a) :</p> <p>In these circumstances, there may be the need for local changes and improvements, such as (but not limited to) enhancements to local highway and freight capacity and quality, public transport infrastructure, BUS SERVICE CAPACITY ENHANCEMENTS, cycling and walking routes and vehicle management matters (including car parking controls and management and car and cycling clubs).</p>	Improved infrastructure can be by way of new or upgraded physical provision, but can also be by way of the way in which infrastructure items are used or managed. In view of this, either means of enhancing bus service capacity is regarded as infrastructure and therefore could be potentially be funded through CIL, so the suggested words can be added as suggested to the SPD.	Amend paragraph 3.5.13(a) as suggested.
<p>1.4 It would be useful, for clarity, to state that a s278 agreement may be with TfL where a development lies on the Transport for London Road network (TLRN). Therefore the following amendment to paragraph 3.5.16 is suggested:</p> <p>'3.5.16 Applicants should note that Transport for London may require contributions over and above those sought by the Council in order to address the impacts of the development. A</p>	Advice noted. The suggested paragraph can be added to the SPD.	Amend paragraph 3.5.16 as suggested.

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<p>DEVELOPMENT THAT LIES ON THE TRANSPORT FOR LONDON ROAD NETWORK (TLRN) MAY ALSO REQUIRE A S278 AGREEMENT TO BE ENTERED INTO WITH TFL, AS THE HIGHWAY AUTHORITY FOR THESE ROADS. TfL operates a pre-application process. For further details please see <a href="http://www.tfl.gov.uk">www.tfl.gov.uk</a>.</p>		
<p><b>2. Environment Agency</b></p>		
<p>2.1 Would like to suggest minor changes to strengthen the guidance with respect to <b>flood risk management</b>: Council may wish to include the NPPF Planning Practice Guidance as national guidance for the Flood Risk and Water Management topic in the Appendix – Policy Pointers section.</p>	<p>Agreed.</p>	<p>At Flood Risk and Water Management row of Appendix 9 – Policy Pointers, add NPPF Planning Practice Guidance: Flood Risk and Coastal Change to Column 5 (National &amp; Other Regional Policies and Guidance) of the table</p>
<p>2.2 Would like to suggest minor changes to strengthen the guidance with respect to <b>groundwater protection and contaminated land</b>: Cases where groundwater contamination from ex-industrial development sites extends onto neighbouring development sites. Bearing this in mind may we recommend adding a comment under Section 3.9 along the following lines: <i>In situations where contamination of soils or controlled waters extends off-site, or originates off-site but affects the development site itself there may be a need for a Section 106 agreement to secure the necessary remediation and/or monitoring, particularly when works are required to be implemented off-site or for the longer term. Under such circumstances relevant parties should agree with the London Borough of Lewisham (in consultation with the Environment Agency as necessary) at the preplanning application</i></p>	<p>Agreed. Currently the SPD contains no reference to groundwater protection or contaminated land. This could be added to section 9 Environmental Protection, with the wording amended to reflect this.</p>	<p>Section 3.9 of SPD to be amended to include text dealing with soil remediation and groundwater protection, including text along the lines suggested by the Environment Agency.</p>

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<i>stage to enter into a Section 106 agreement.</i>		
2.3 Under the topic, Environmental Protection, in the Appendix – Policy Pointers section, you may wish to additionally refer to Lewisham's Development Management Policy 28 and NPPF paragraph 109 to support this.	These documents and sections are already included in Appendix 1	No action required.
2.4 Would like to suggest minor changes to strengthen the guidance with respect to <b>biodiversity</b> : May wish to consider using biodiversity policies, including Lewisham's Core Strategy Policy 11 and referring to the Ravensbourne River Corridor Improvement Plan, in addition to flood risk policies to further justify financial contributions from development of sites next to the river.	Core strategy policies should only be referred to, not repeated, in Council policy documents.	At Biodiversity row of Appendix 9 – Policy Pointers, add Core Strategy Policy 11 (River and Waterways Network) to column 2 and Ravensbourne River Corridor Improvement Plan to column 6 of the table.
<b>3. Network Rail</b>		
3.1 Enquiry (ie invitation to comment) passed to local Community Relations team who are investigating the issue as quickly as possible.	No indication that there may be issues to be addressed – taken as having no comment to make.	No action required
<b>4. Department of Health</b>		
4.1 Copies of letter passed to NHS Lewisham Clinical Commissioning Group (CCG) and NHS England's London Area Team as they are best placed to respond.	No indication that there may be issues to be addressed – taken as having no comment to make	No action required
<b>5. Natural England</b>		
5.1 Pleased to see reference to biodiversity referenced under Section 3.11, and broadly support paragraphs 3.11.1 to 3.11.11. The reference to and inclusion of green infrastructure and biodiversity is to be welcomed and encouraged.	Support noted.	No action required

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5.2 Reference to the London Plan is welcomed and to be encouraged also, the Council are advised to ensure that the latest iteration of the Plan is referenced (Further Alterations to the London Plan – which is currently under review), to ensure that Lewisham have the most relevant and up to date policies.	Support for reference to the London Plan noted. Acknowledged the need to ensure that the SPD remains abreast of alterations to the London Plan.	Ensure that content of the SPD remains consistent with the Further Alterations to the London Plan until adoption of the SPD.
5.3 Subject to the above Natural England does not wish to offer any substantive comments on the document as submitted.	Noted.	No action required
<b>6. Renewal Group</b> ( <i>developers of Surrey Canal Triangle strategic site, through Signet Planning</i> )		
6.1 <u>Acknowledging Previous S.106 Contributions</u> Infrastructure currently paid for under S.106, but if the development were to alter under future planning applications, it is not clear whether the Surrey Canal development would become liable for CIL and therefore how infrastructure such as the station would be funded by the Surrey Canal development.	If a replacement permission is granted after CIL is introduced, it will be liable for CIL, regardless of the amount of S.106 obligations paid. Any S.106 contributions already paid pursuant to a previous permission would be taken into account in calculating new S.106 charges, but will not affect CIL – this will be payable regardless and calculated in line with the CIL Regulations.	Section titled 'Consideration of Previous Contributions' added to the SPD stating that previous contributions will be taken into account.
6.2 <u>Development Standards</u> The SPD includes detail on the requirements for dwelling size and mix, tenure mix and wheelchair housing, all of which could be secured on a site by site basis via the use of appropriate planning conditions. In most cases dwelling sizes, tenure mix and wheelchair housing will form an integral part of a scheme and the detail would be self-evident within any consented planning drawings. It is not therefore clear why such detail needs to be reiterated within the SPD as the requirements are already set out in adopted planning policy, such as the London Plan and Core Strategy documents. In addition, Paragraph 1.7 of the SPD acknowledges that "they [Planning obligations] are used when there is a requirement to	The requirements regarding bedroom numbers, dwelling mix, tenure mix and wheelchair accessibility requirements all relate to affordable housing obligation calculations as the costs of meeting these requirements can be quantified. For this reason, it is appropriate that they be in the same document as the affordable housing obligations. As they underlie the obligations imposed and secured by way of signed S.106 agreements, it is appropriate that they be contained in the agreement, rather than the planning conditions.	No action required.

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<p>address the impact of a development and the impact itself cannot be dealt with through a planning condition on the permission".  Furthermore, paragraph 4.9 states that "where there is a choice between imposing conditions and entering into a planning obligation, the imposition of a condition is preferable".  It is therefore considered that such matters do not need to be addressed in the SPD.</p>		
<p><b>6.3 Wheelchair Housing</b>  Paragraph 3.2.4 of the SPD states that "The Council will secure the timely provision, and retention in perpetuity, of wheelchair units (both affordable and private) provided as part of a development through a planning obligation (or condition where appropriate). This will include fit out requirements for affordable units and details of the developer's marketing responsibilities for both affordable and private units. Where wheelchair units are not provided (or cannot be provided to the required standard) the Council will seek a financial contribution towards provision of wheelchair housing elsewhere in the borough".  It is not clear how such a requirement is compliant with planning policy. London Plan Policy 3.8 states that "ten per cent of new housing is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users".  Planning policy does not, therefore, require 10% of all units to be fitted out as wheelchair units, or that either the affordable or private tenure dwellings need to remain as such in perpetuity. It is not therefore clear how this position meets the tests of Regulation 122 which require a planning obligation to be "(a) necessary to make the development acceptable in planning terms".  Again, it is not clear why the marketing details for both private and affordable wheelchair units cannot be provided by way of a suitably worded planning condition.</p>	<p>The London Plan sets a minimum development standard, but the SPD sets out the mechanism by which developments will achieve this standard.</p> <p>The wording of the SPD requires at paragraph 3.2.7 that a minimum of 10% of all housing is to be adapted, OR EASILY ADAPTABLE to meet the . . . Design Guidelines. It therefore does not require 10% of dwellings to be fitted out so as to be able to be occupied by people in wheelchairs.</p> <p>The 10% requirement refers to dwellings being located and laid out so as to be capable of wheelchair access (ie level ground floor access or served by lift, and designed in a way so that wheelchairs can be manoeuvred to all parts of the dwelling, and so that it is able to be fitted out for wheelchair users if necessary.</p> <p>Whilst assessment of the design will ensure that the London Plan minimum of 10% of dwellings are either fitted out or able to be fitted out for wheelchair use, it is necessary that these requirements are included in the S.106 document, as this is a legally-binding agreement, to ensure that this requirement can be enforced in perpetuity.</p>	<p>No action required.</p>



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<p>6.4 <u>Pooling Planning Obligations</u></p> <p>The CIL will largely replace planning obligations as the way in which developments contribute towards funding new infrastructure necessary to support new development. Once a local CIL has been adopted or by April 2015 (whichever is the sooner) the Council will not be able to pool planning obligations from more than five developments to pay for any one item of infrastructure.</p> <p>However, we note that there are several categories within the draft SPD that could result in the “pooling” of contributions from five or more developments. These include payments towards:</p> <ul style="list-style-type: none"> <li>– Training, support and recruitment of local people;</li> <li>– Mitigation in relation to loss of commercial floorspace and/ or contribution in lieu of on-site new employment floorspace;</li> <li>– Public realm improvements &amp; public art;</li> <li>– Children’s playspace;</li> <li>– Carbon offsetting; and</li> <li>– Environmental protection.</li> </ul>	<p>CIL will only replace S.106 as an infrastructure funding mechanism for strategic infrastructure – this is the infrastructure that is required regardless of the development of any particular site.</p> <p>Infrastructure required under S.106 will be scheme-specific only (ie the need for it will be generated by the development), and so in most cases will be provided within or ancillary to the development funding it.</p> <p>The Council is aware of the restriction on pooling the contributions under S.106 from more than five developments. By definition, if contributions are made through CIL, the pooling limit does not apply.</p> <p>It should also be noted in any event that training and recruitment, mitigation of loss of commercial floorspace, carbon offsetting and environmental protection are not infrastructure and thus the pooling limit does not in any event apply to them.</p>	<p>No action required.</p>
<p>6.5 <u>Transparency:</u></p> <p>Council will need to ensure transparency when contributions are secured as to how contributions are spent to avoid pooling money under the generic headings set out above.</p>	<p>Noted. The Council is improving its CIL and S.106 monitoring systems to continue to ensure that contributions and expenditure are both recorded and monitored in a transparent way.</p>	<p>No action required.</p>
<p>6.6 <u>Flood Management &amp; Biodiversity:</u></p> <p>Paragraphs 3.10.11 &amp; 3.11.11: “Where direct provision by the developer is not achievable a financial contribution may be necessary. This should be based on the cost to the Council of undertaking the necessary works or of engaging a third party to undertake the works. The level of cost should be evidenced by the developer and then submitted for agreement with the Council in</p>	<p>Agreed: the SPD should state that where the Council or a third party undertakes works required under S.106, these works will be done within a reasonable period.</p> <p>It is noted that biodiversity and strategic flood management infrastructure are both contained in the Regulation 123 list. The distinction between these</p>	<p>Add text to SPD stating that where the Council or a third party undertakes works required under S.106, these works will be done within a reasonable period.</p>

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<p>advance".</p> <p>Notwithstanding that the Council's draft CIL Regulation 123 list includes biodiversity as a CIL item, a commitment in the SPD should be made to confirm that should these planning obligations be applicable the S106 Agreement will also define that the Council, or third party, will undertake the specific works within a satisfactory timeline.</p>	<p>items appearing in the Regulation 123 list and in the S.106 SPD is that CIL contributions will be used for strategic, pro-active flood mitigation and protection regardless of any particular development occurring, and the SPD is the means to address scheme-specific requirements (ie a need generated by the development of itself),</p>	
<p><u>6.7 New Planning Applications</u></p> <p>Concern at how matters to be managed in the following circumstances:</p> <p>1. Where fresh applications for revised schemes (in part) or 'drop in' applications trigger CIL contributions, as these could result in 'double counting' payments where an existing S.106 agreement has already secured relevant strategic infrastructure, or could result in combined obligations which render a scheme unviable; and</p> <p>2. Where new applications for major schemes can provide Strategic Infrastructure on site (which serves wider needs than the requirements in Regulation 122 to mitigate the impacts of the development) but where the level of requirements anticipated in the Council's draft revised SPD on planning obligations, including transport &amp; affordable housing, would render a development unviable.</p>	<p>Proposals will be assessed for CIL contributions and S.106 obligations as per the policy in place at the time of fresh or 'drop in' applications being lodged. The need for additional S.106 obligations and/or CIL contributions will be based on the totality of the revised application and calculated in accordance with the policy in place at the time of the new application and the CIL Regulations 2010 (as amended), and credit will be given for any CIL already paid or S.106 obligations met.</p> <p>Regardless of any CIL obligations, S.106 obligations may still need to be imposed in order to address any otherwise adverse impacts of development proposals. Their combined impact will be taken into account in assessing applications. This will still be the case if CIL-funded infrastructure is provided on site.</p>	<p><i>See action arising from point 6.1 above.</i></p> <p>Text added to paragraph 1.24 to help clarify the difference between CIL-funded strategic infrastructure and scheme-required infrastructure, which will be funded through section 106, and include explanation that infrastructure required to mitigate the impact of a specific scheme or to make it viable or</p>

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<p>3. Where new applications within existing outline permissions do not propose alternative land use, types or amounts than previously permitted in outline for which S106 contributions have been secured, the existing S106 agreements should be reviewed to ensure that the obligations within the S106 are appropriate.</p>	<p>Agreed. If a subsequent application is for a proposal or change to a proposal which changes the sum total of S.106 obligations, it will be appropriate to revisit any S.106 obligations to ensure that they are still relevant.</p>	<p>acceptable may in some cases have a strategic function as well.</p>
<p>6.8 <u>Cumulative Impact of Obligations</u>  In the case of new applications, LBL should work with applicants to consider how both the mitigation requirements of the development, and, where appropriate, the delivery of Strategic Infrastructure on-site can be achieved. In these circumstances LBL should consider the combined impacts of any on-site provision of Strategic Infrastructure, including affordable housing and transport infrastructure. This would potentially include determining eligibility for exemption from CIL.</p>	<p>The Council fully recognises the need to be aware of the cumulative impact of different S.106 obligations, and of the combined impact of S.106 obligations and CIL . S.106 obligations were considered in the production of the CIL charging schedule. It is keen for new development proceed when it meets the objectives of its core strategy. However it is also aware of the pressing need for additional and upgraded social and physical infrastructure in the borough.</p> <p>The Council's proposed policy on CIL relief is that there will be no CIL exemptions considered in any case.</p>	<p>No action required.</p>
<p>6.9 <u>Delivery of CIL- and S.106-Funded Works</u>  It is likely that following the introduction of CIL, legal agreements will be required between applicants and LBL setting out how infrastructure will be delivered, including that funded through CIL. LBL should use best endeavours to ensure delivery of infrastructure in line with such agreements, which will be determined as part of the development management process.</p>	<p>Agreements will still be required in respect of S.106 obligations. There will be no S.106 financial contributions except in cases where the Council agrees to accept the cash equivalent of the value of works or off off-site affordable housing that are covered by S.106.</p> <p>CIL obligations will be administered by means of issuing of liability notices for CIL to be paid before development commences, with a legal power to issue stop-work orders where payments is not paid when</p>	<p>No action required.</p>

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	<p>due.</p> <p>Where a S.106 agreement requires the Council to undertake works at the developer's expense rather than the developer themselves doing or paying a third party to do these works, the S.106 agreement will contain provisions to ensure that such works are undertaken at the time necessitated by the development (unless there are extenuating circumstances for it to be deferred). .</p> <p>In respect of CIL contributions, works funded by CIL will be undertaken as and where dictated by wider infrastructure priorities. CIL payments will be pooled, and CIL-funded works are not required to be timed or located to coincide with the development/s helping fund them.</p> <p>The only time that CIL infrastructure would be subject to an agreement would be where it is being provided in kind and/or on-site by the developer, but such a policy is not being considered for adoption at this time.</p>	
<p>6.10 <u>Discretionary Relief</u></p> <p>The CIL regulations allow for local authorities to provide discretionary relief from CIL where a specific scheme is not viable if it pays the full Community Infrastructure Levy charge, and where a signed Section 106 is in excess of the CIL levy.</p> <p>We note paragraph 1.26 of the draft SPD which specifically states that "the Council has decided not to introduce a CIL Exceptional Relief Policy at the current time, but the impact of the introduction of the CIL and the potential benefits of introducing such a policy will be kept under review".</p> <p>It is disappointing and of concern that no reassurance is provided for developers of the Strategic Sites that may be required to make</p>	<p>The Council has decided not to allow discretionary relief. It is of the view that, as the CIL rates have been found to be at a level which will not prevent development from being viable, there is no justification for offering CIL relief. As is the case in the current absence of CIL, the onus is on developers to ensure that the amount they pay for land reflects all development costs, therefore ensuring that development is viable.</p>	<p>No action required.</p>

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<p>substantial in kind or additional contributions through Section 106.</p> <p>For a local authority to introduce an Exception Relief Policy, it must publish a statement setting out its intention to do so. Although we acknowledge that this is not required as part of the process of developing a CIL charging schedule, the Council could provide clarity on this point, and re-assurance for developers of the Strategic Sites Where they may be required to make substantial in kind or additional contributions through Section 106.</p>		
<p><b>7. Theatres Trust</b></p>		
<p>7.1 We are concerned that the document does not include community and cultural facilities that may be provided through Section 106 planning agreements.</p> <p>Many important community facilities, such as new theatres, are delivered via s.106 planning agreements that would not otherwise be funded by Council's Community Infrastructure Levy, given they are not owned or provided by the local authority. There are a number of examples where a developer has redevelopment a theatre site and relied on s.106 agreements to ensure a new and adequately fitted out theatre space is provided as part of the larger, usually mixed use development. These include Riverside Studios, Hammersmith; Collins's Theatre, Islington; Theatre Peckham, Southwark; and St James Theatre, Westminster; and of course there are a range of other community and cultural facilities that can be replaced in a similar manner. This better reflects advice in Para 70 of the National Planning Policy Framework that states local authorities should plan for and guard against the loss of cultural facilities and services.</p> <p>We therefore suggest that the draft SPD be amended to allow and encourage planning obligations to deliver important community and cultural infrastructure in the Borough.</p>	<p>The S.106 SPD sets out obligations in respect of what may be expected from the majority of developments, but it is not a definitive list, and under the Council's general powers to secure acceptable development through its power to impose conditions on a permission, matters not addressed in the SPD can still be addressed in determining whether schemes will be given planning permission.</p> <p>There will be very few cases where theatre provision, or contributions to theatre provision, will arise. This can be addressed in individual cases.</p> <p>The Regulation 123 list, which sets out the types of infrastructure which CIL will help fund, includes local community facilities (including but not limited to community centres and halls and libraries).</p> <p>This gives the Council the ability to secure funding for theatres either as standalone developments or as part of multi-use development schemes.</p>	<p>No action required.</p>

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<b>8. Mr Andrew Wood</b>		
<p>8.1 <u>Section 3.11 Biodiversity:</u> As a whole the section is vague and weak and its drafting suggests or a lack of commitment to the underlying issue.</p>	Comment noted	No action required.
<p>8.2 <u>Private Gardens (section 3.1.11)</u> Section 3.11.1 does not make it clear that one of the most significant repositories of biodiversity within the Borough are its private gardens and that these gardens are under increasing threat from garden grabbing. When it comes to protecting biodiversity across the whole of the Borough it is not a sustainable policy to give massive protection to sites of importance for nature conservation and very little protection to garden land. There is only one reference to gardens in the whole document and this is not in the context of biodiversity. It is difficult to reconcile the need for providing extra housing and at the same time protecting garden land but to pretend the issue does not exist is not constructive.</p>	The Government adopted a policy in 2009 to prevent use of 'backlands' (back gardens) as development sites. This is binding on the Council and therefore does not need to be included in a development contributions policy. It needs to be noted that beyond its power to control (and thus prevent) development, and to protect trees from damage or removal, there is little that councils have power to regulate in back gardens.	No action required.
<p>8.3 <u>Background and Justification (section 3.11.2)</u> I agree with the need to minimise and eliminate the impacts of development on biodiversity. I am wary of the Council's reference to mitigation. Biodiversity is usually found in areas that suit and support it. All too often mitigation is a phrase used to describe the process where one environment is destroyed and a different, less biodiverse environment is supplied as an alternative. Too often mitigation has become the tick box approach of choice for the Planning Department.  The phrase "right tree, right place" is trite and unhelpful. For example, often the right tree is a dead or dying tree which the</p>	Dead or dying trees are not regarded as the 'right tree', and, subject to personal and property safety as trees grow, the species required as part of new development will in most cases be those encouraging increased biodiversity and healthy, sustainable animal and plant populations.	No action required.

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<p>Council cuts down for health and safety reasons. Mature trees are increasingly felled to reduce the risk of subsidence claims.</p> <p>Too much emphasis is placed on living roofs and living walls. The former provide a habitat for a very limited number of species. The latter are high maintenance and invariably created with non-native plants.</p> <p><u>Further submission on biodiversity:</u></p> <p>When I read the words "right tree, right place" I began to wonder if the person who had drafted this section actually understands the meaning of biodiversity. What a ridiculous phrase. It has no meaning in relation to biodiversity. Fine for setting out the planting layout of a new development but little else. It is the essence of biodiversity that the flora and fauna we want to preserve is found in the place where it occurs naturally and to protect that biodiversity you need to safeguard the environment in which it occurs.</p> <p>The reference to living walls also suggest that the draftsman has a fundamental lack of understanding in relation to biodiversity. I would challenge you to go out at lunchtime today, find a living wall and assess the biodiversity it brings. You could ask Nick Pond to come along to help you. Green walls are little more than a building design fad which will be out of favour within 10 years. If Lewisham's planners think that biodiversity is going to be preserved by a few living walls then we might as well give up now and cover the whole borough in concrete.</p> <p>I would like to think that the section on biodiversity will be improved before it is finalised but sadly, in my experience of Lewisham "consultations", I am sure my comments will be completely ignored. I am not quite sure why the Planning Department is so defensive about the quality of its policy documents but it is a disservice to local residents to hold consultations and then totally ignore the responses.</p>		

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<p>8.4 <u>Appropriate biodiversity infrastructure (section 3.11.3)</u> This text is so vague as to be almost meaningless.</p>	<p>Agreed, and this will be reworded to clarify its intention.</p>	<p>Reword paragraph 3.11.3 as follows: Development having an impact on the biodiversity of the site will be required to incorporate features to minimise the loss of, and where possible, improve, the biodiversity of the site.</p>
<p>8.5 <u>Funding biodiversity works (section 3.11.4)</u> What funds will be made available? What has been budgeted for 2015?</p>	<p>CIL will be implemented in April 2015 subject to full Council approval. There is likely to be a time lag between the implementation of CIL and receipt of funding as it is not payable unless a permission is implemented and the payment date is within a minimum of 60 days of commencement. There will not be significant CIL funds collected in 2015. In the future biodiversity funding must be balanced against other CIL infrastructure needs.</p>	<p>No action required</p>
<p>8.6 <u>Planning obligations to secure biodiversity measures (section 3.11.5)</u> Weak words which will give Planning Officers too much discretion to rubber stamp token mitigation.</p>	<p>This wording means that in some cases the necessary obligations will be secured through conditions of consent, and in other cases by a S.106 agreements. Both are legally enforceable.</p>	<p>No action required.</p>
<p>8.7 <u>Details of intended planning obligations covering biodiversity protection (section 3.11.10:)</u> It is surprising that the Council is willing to provide such specific guidance in relation to a matter such as social housing but absolutely no guidance in relation to biodiversity. It suggests that the Council does not take the issue of biodiversity seriously. The wording of this section is pitiful.</p>	<p>Housing need is not site-specific, and is well documented and it is therefore possible to be precise in setting out developer requirements to help meet this need. Biodiversity protection and enhancement on the other hand needs to be considered on a site-by-site basis, and is largely dependent on the scale and nature of the site and of the proposed development.</p>	<p>No action required.</p>
<p>8.8 <u>Capacity to ensure developers fully meet obligations regarding biodiversity (section 3.11.11)</u></p>	<p>This blanket assertion is not accepted. However, policies need to be written to ensure compliance with</p>	<p>Replace the word 'should' with 'is to' or 'are to' as necessary in</p>



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It is a fact of life that developers will do the bare minimum to obtain planning permission. The wording of this section does nothing to dissuade them from taking such an approach in relation to biodiversity.	requirements by all developers.	paragraph 3.11.11.

## **Appendix 2: List of Persons and organisations consulted on draft Planning Obligations SPD – October-November 2014.**

1921 (Lewisham) Squadron, Air Training Corps (ATC)  
2000 Community Action Centre  
999 Club Trust  
999 Club, Downham  
999 Club, New Cross  
Abbey National plc  
Abbeyfield (Deptford) Society  
Abbeyfield UK  
ABC Residents Association  
Access for Living (AFL)  
Ackroyd Community Association  
Acme Studios  
Acorn Estates  
Acorn Mortgage Consultants  
Acre Lifts Ltd  
ACTF Credit Union  
Acting for BT plc Rippon Development Services  
Acting for Land Securities DP9  
Acting for London Business Centres CgMs Consulting  
Action Leadership and Community Development Association (ALCOD)  
Adams Hendry  
Adelaide Avenue Action Group  
Adolphus Est. RA  
Adrian Salt and Pang Limited  
Adun Society  
Affinity Sutton  
Afghan Community Organisation  
Africa Advocacy Foundation  
Africa Development Network  
African Community Partnership (ACP)  
African Welfare Association  
Age Concern  
Age Exchange Reminiscence Centre  
Age UK Lewisham and Southwark  
Aitch Group  
Albany Centre  
Albion Millennium Green Trust  
Albion Way Methodist Church  
Algernon Road Residents Association  
All Saints Church  
All Saints Church and Community Centre  
All Saints Church, Blackheath  
Allerford Chapel  
Allies and Morrison: Urban Practitioners  
All-Oneness Productions (AOP) (formally Loco Bravura Arts Group)  
Alsop Verrill Planning  
Amblen-After School, Weekends and Holiday Youth Leisure Organisation  
Amersham Triangle RA  
Amis-BK (Friends of Bukavu)  
Amman Elderly Asian Group  
ANA Architecture

Angel of Mercy Voluntary Organisation (AMVO)  
Anglo Office Group Ltd  
Anthony Goss Consultancy  
Anyadwe Children and Family Welfare Association  
Arabic Language Club - Monson School  
Architects Raymond Hall Ltd  
Art in Perpetuity Trust (APT)  
Ashill Developments  
Asian Family and Youth Link  
Association for Pastoral Care of the Mentally Ill  
Association of Jamaican Trust  
Association of London Borough Planning Officers  
Association of London Government  
Association of Sri Lankans in the UK  
Association of Women Refugees from Vietnam in Lewisham  
Atisreal  
Avalon Antique Fireplace Specialist  
Baizdon Road TA  
BALGRA  
Bampton's Tenants Association  
Bangladeshi Welfare Association  
Barclays Bank Limited  
Baring Community Group  
Baring RA  
Baring Road Medical Centre Patient Participation Group (PPG)  
Baring school  
Barnardo's Akwaaba Centre  
Barnes Wallis Community Centre  
Barratt East London  
Barriedale Allotment Association  
Barton Wilmore Planning Partnership  
Bawtree Road Community Project  
Beaver Housing Society Ltd  
Beckenham Place Community Trust  
Bellingham NC  
Bellingham North TA  
Bellingham Recreation Project Ltd (BECORP)  
Bellingham South TA  
Bellingham/Downham Community Bereavement Scheme,  
Bellway Homes South East  
Berkeley Homes Urban Renaissance Ltd  
Big Yellow Self Storage Company  
Biscoe & Stanton  
Black Ant Co Ltd  
Blackheath and Dacre Park TA  
Blackheath Conservatoire of Music and the Arts  
Blackheath Joint Working Party  
Blackheath Ramblers  
Blackheath Scientific Society (BSS)  
Blackheath Society  
Blackheath Wanderers Sports Club  
Blue Sky Planning Ltd  
BMI The Blackheath Hospital  
BNP Paribas Real Estate

Boyer London  
BPTW Architects  
Brady Eastwood Pierce & Stewart  
Brandram Road Community Centre Association  
Brasted Close and Peak Hill RA  
Brian Barber Associates  
British Telecommunications plc  
Brockley Baptist Church  
Brockley Cross Action Group  
Brockley Park RA  
Brockley Society  
Brockley Tenants' Co-operative Ltd  
Brookehowse Community Centre  
Brookmill Amenity Society  
Brown Electrical Services  
Brownhill Road Baptist Church  
Bunbury Childminders Project  
Burnt Ash Methodist Church  
Business Development Office  
CA Planning  
CACAO Project  
Calabash Club  
Calabash Day Centre  
Campaign for Real Ale Limited  
Canadian Ave RA  
Candlelight Trust  
Capita  
Carers Lewisham  
Caribbean Youth & Community Association  
Carrara Building Services  
Catch The Vision (CTV)  
Catford & Bromley Synagogue  
Catford (Southend) and Downham Team Ministry St Barnabas' Church, Downham  
Catford Beer Festival Organiser SELCAMRA  
Catford Citizens Advice Bureau (CAB)  
Catford Southend RA  
Catford Timber Company  
Catford Wanderers Sports Club  
Cathedral Group plc  
CBRE  
Celestial Church of Christ  
Celia Hammond Animal Trust (CHAT) Neuter Clinic  
Celtic Cross Youth Accordion Band  
Central Wellmeadow Residents & Tenants  
Centre for Ecology and Hydrology  
Centre for Multicultural Development and Integration (CENMUD)  
Centre for Women's Career Development and Success (CWCDs)  
Centrepoint  
Centrepoint - Breakspears Road Project  
CGMS Consulting  
Champion Hall Community Association  
Charlotte Turner Supplementary (CTSS)  
Chase RA  
Chesterhouse Properties Ltd

Chinbrook Estate TA  
Chinbrook Meadows Horticultural Society  
Chowderly, Osborne & Harrison  
Chris Thomas Ltd  
Christ Apostolic Church (South Bermondsey)  
Christ Apostolic Church, WOSEM (Deptford)  
Christian Care Ministries and Sunbeam Nursery  
Christian Fellowship Centre  
Church Housing Association (London Resettlement Service)  
Church of God in Christ (Calvary) Ltd (COGIC)  
Church of Our Lady and St Philip Neri  
Church of our Lady of Lourdes  
Church of St. Mary Magdalen  
Church of St. Saviour & St John the Baptist  
Church of St. William of York  
Church of the Annunciation & St. Augustine  
Church of the Ascension  
Church of the Assumption (Deptford Catholic Church)  
Church of the Good Shepherd  
Church of The Holy Cross  
Churches Together in Central Lewisham  
Churches Together in Lee  
Circle Anglia  
Citibank  
City & Provincial Properties plc  
Civil Aviation Authority  
Clare Tenants and Residents Association (CTRA)  
Cluttons LLP Planning Regeneration  
CMA Planning Ltd  
Cockpit Arts  
COGOP  
College Park Players  
Colliers CRE  
Collins Ltd  
Community Activities Network (CAN)  
Community Health Service  
Compass Land & Planning  
Congoese Community Trust  
Congoese Contact Project  
Convenor Friends of Prince of Wales Pond  
Co-operative Bank plc  
Co-operative Housing in South East London (CHISEL)  
Corporation of London (Planning Department)  
Costain  
Costco Wholesale UK Limited c/o RPS Planning and Development  
Creekside Education Trust  
Creekside Forum  
Crest Nicholson (Eastern) Ltd  
Crofton Park Baptist Church  
Crofton Youth Centre  
Crossfields TA  
Crossroads Greenwich and Lewisham Ltd  
Croudace Homes  
Crown Estate Commissioners

Crownsavers Credit Union (Lewisham Employees Credit Union)  
Cultural Quarters  
Culverley Green Residents Association  
Cushman & Wakefield  
Dakas & Co  
Dalmain Home School Association (DHSA)  
Dalton Warner Davis LLP  
Dartmouth Court RA  
Dartmouth Rd TA  
David Cowan Associates  
David Walker Chartered Surveyors  
Davis Ceilings Limited  
De Frene Road Allotments Society  
DeafPlus (formerly Breakthrough Deaf-Hearing Integration)  
Deco Design & Build Co Ltd  
Defence Estates (South East & Germany)  
Dennets Neighbourhood Assoc  
Department for Communities and Local Government  
Department for Education  
Department for Environment, Food and Rural Affairs  
Deptford and New Cross Credit Union  
Deptford Churches Centre  
Deptford Community Association  
Deptford Community Radio Project  
Deptford Deanery  
Deptford Fund For The Elderly  
Deptford Green School  
Deptford Housing Co-operative Limited  
Deptford Methodist Mission  
Deptford Park RA  
Deptford Vietnamese Health Project  
Design Council (incorporating CABE)  
Design Manager Pocket  
Devonshire Road Nature Reserve  
Diabetes UK - Lewisham Support Group  
Dialogue communicating planning  
Direct Communications Unit Home Office  
Disabled Persons Transport Advisory Committee  
Dodd Lewis  
Dorville Road TA  
Downham Community Centre (Wesley Halls) (DCC)  
Downham Elderly Health Project (DEHP)  
Downham Estate RA  
Downham Tamil Association  
Downham Way Family Church  
Dowson Court TA  
DP9  
DPDS Consulting Group  
Dressington Avenue RA  
Drivers Jonas  
Drivers Jonas Deloitte  
Driving Standards Agency  
Dron & Wright Ltd  
Dron & Wright Ltd

Drugs in Deptford Project (DID)  
Durrant Vevers Partnership  
Eaves Housing for Women Ltd  
Ecological Regeneration Manager  
Economic Skips Ltd  
Edmund Waller After School Club (EWASC)  
Edric RA  
Elder People's Support Project (formerly Senior Citizens Association)  
Eliot Bank TA  
Elverson Road Residents Association  
Embleton Rd RA  
Emmanuel Pentecostal Church  
Empire Lewisham Developments LLP  
English Heritage  
Entec UK Ltd (on behalf of National Grid)  
Environment Agency  
Equality & Human Rights Commission  
ESA Planning  
EU Developments  
Evelyn 190 Centre  
Evelyn Community Centre  
Ewart Road Housing Co-op  
Excalibur Tenants Cooperative Ltd  
Exford/Guibal/Winn Road Residents Association  
Exodus Youth Project  
Facility Development Manager The Lawn Tennis Association  
Fairford TA  
Fairview New Homes Plc  
Family Housing Association  
Family Welfare Association (FWA) Lewisham Shared Housing Scheme  
Farrer & Co  
Federation of Refugees from Vietnam in Lewisham (FORVIL) (formerly ORVIL)  
Federation of Small Businesses  
Fern Court TA  
Firstplan  
Fitzgerald Project  
Five Ways (TMC)  
Flower House TA  
Fordham TA  
Forest Hill Cars  
Forest Hill Christadelphians (FHCE)  
Forest Hill NC  
Forest Hill School  
Forest Hill School Governing Body  
Forest Hill Society  
Forest Hill Society  
Forest Hill Traders Association  
Forster House TA  
Foulds Ingham Associates  
Foundation of Love Ministries  
Fourth Lewisham South Scout Group  
Fraser Brown McKenna Architects  
Freight Transport Association  
French African Church Rehoboth

Fresh Start Christian Ministries  
Friends Meeting House  
Friends of Beckenham Place Park  
Friends of Blythe Hill Fields  
Friends of Brockley & Ladywell Cemeteries  
Friends of Hilly Fields  
Friends of Ladywell & Brockley Cemeteries  
Friends of Mayow Park  
Friends of Stondon Park  
Friends of the Earth  
Friends of the Horniman  
Friends of the Young Deaf  
Fryer Stapleton & Co Limited  
Fun Movement  
Fusion Online Ltd  
FUSS (Friends and Users of Staplehurst Shops)  
G L Hearn & Partners  
G L Hearn Ltd  
Galliard Homes Limited  
Garden History Society  
George Wimpey South London Ltd  
George Wimpey West London Ltd  
Gerald Eve LLP  
Giffin Street TA  
GL Hearn  
Glebe Preservation Society  
Glebe Residents Association  
Glenny LLP  
Global Village International  
Goldcrest Homes  
Goldsmith's College, University of London  
Goldsmiths Community Association (GCA)  
Goldsmiths, University of London  
Gosterwood Residents and Tenants Assoc  
Government Office for London  
Grant Saw Solicitors  
Grassmount RA  
Greater London Authority  
Green Chain Working Party  
Green Party Group, London Borough of Lewisham  
Green Tea Architects LLP  
Greenland Mews Residents Association  
Greenwich and Lewisham Friends of the Earth  
Greystead Road TA  
Griot Institute  
Grove Centre  
Grove Park Community Group  
Grove Park Estates  
Grove Park TA  
Gruff Ltd  
GVA Grimley LLP  
H Sivyer Transport Ltd  
Halcrow Group Limited  
Half Price



Hall Drive Residents Association  
Hander & Hitchenson Theatre Collection  
Hangled Films,  
Haseltine Youth Centre  
Hatcham Park RA  
Hawke Tower TA  
Hazel Grove  
Hazel Grove TA  
Hazelhurst Court TA  
Health & Safety Executive London  
Hearsay,  
Heart 'n Soul  
Help is There (HIT)  
Hennel Close RA  
Heritage of London Trust  
Hermitage TA  
Hexagon Housing Association Ltd  
Higgins Homes Limited  
Highways Agency  
Hillview Community Day Centre  
Hilly Fields Park User Group (HFPUG)  
Historic Places Adviser English Heritage  
Hither Green 2020  
Hither Green Baptist Church  
Hither Green Residents Group  
Hither Green Trust  
Holbeach Baptist Church  
Holme Lacey RA  
Holy Trinity Church Lewisham  
Holy Trinity Church, Sydenham  
Holy Trinity Healing Ministry  
Holy Trinity Organisation  
Home Park Neighbourhood Residents Association  
Home Park TA & RA  
Homebase Ltd  
Honor Oak NC  
Honor Oak Neighbourhood Association  
Honor Oak Park Association  
Honor Oak Park RA  
Hope Supplementary School  
Houses into Homes (HiH)  
Housing 21 (Cinnamon Court Day Centre)  
Howard Lewisham Ltd  
Howard Sharp and Partners  
HSBC  
HUDU  
Hughes Field TA  
Humanitas  
Hyde Housing Association  
ICENI Projects Ltd  
Ichthus Christian Fellowship  
Ichthus/Honor Oak Community Church  
Ideal Homes London Limited  
Independents Centre

Indigo Scott Group Ltd  
Integrated Urbanism Arup  
International Welfare Association (IWA)  
IRIE! Dance Theatre c/o Moonshot Centre  
Irish in Britain Representation Group (Lewisham IBRG)  
Isis (Family Health)  
J C Cunnane Associates  
Jehovah's Witnesses in Lewisham  
Jesus Christ King of All Nations  
John Payne Commercial  
Jones Hire  
Jones Lang LaSalle  
Josef's House  
JTS Partnership  
Kalmars  
Kangley Area RA  
Kids First  
Kids Need You  
Kiltox Contracts Ltd  
King Sturge LLP  
Kingdom Hall  
Kings and Princes Garth Residents' Association  
King's Church, Catford  
Kirkwells  
Knight Frank  
Knight Frank & Rutley  
L B Barking & Dagenham  
L B Barnet  
L B Bexley  
L B Brent  
L B Bromley  
L B Camden  
L B Croydon  
L B Ealing  
L B Enfield  
L B Hackney  
L B Hammersmith & Fulham  
L B Haringey  
L B Harrow  
L B Havering  
L B Hillingdon  
L B Hounslow  
L B Islington  
L B Lambeth  
L B Merton  
L B Newham  
L B Redbridge  
L B Richmond upon Thames  
L B Sutton  
L B Tower Hamlets  
L B Waltham Forest  
L B Wandsworth  
L B Westminster  
Laban Centre

Labour councillor for Blackheath Westcombe ward Greenwich Council  
Ladywell Centre for People with Physical Disabilities  
Ladywell Fields User Group (LFUG)  
Ladywell Society  
Ladywell Society  
Ladywell Village Improvement Group  
Laleham Rd/Brownhill Rd Action Cttee  
Lambert Smith Hampton  
Lancer Investments Limited  
Land & Development Manager Land and Development Asset Protection Team National  
Grid  
Land Securities  
Land Use Consultants  
Landmark Information Group Limited  
Lanyard House TA  
Latin-American UK Access  
Laurel Bank RA  
Laurence House Quercus Project Lewisham  
Law 2380 T/A Industrial Holdings Fund  
Lawrie Park Gardens T & RA  
Lawrie Park RA  
LCCI/CBI London Manufacturing Group  
LDF Team The Planning Inspectorate  
LDR  
Le May Hope & Garden Close TA  
Leader Stop the newsshoppers bullying campaign against staffies  
Lean on Me Family Centre (LOMFC)  
Leander Court Community Centre  
Leander Youth and Community Centre  
Leathersellers Federation  
Leathwell Road Residents Group  
Lecturer Birkbeck, CEL, City Lit  
Lee and District Land Club and Allotment Society  
Lee Christadelphians  
Lee Green United Reformed Church  
Lee Manor Society  
Leegrove Gateway Club  
Leemore Training Centre  
Leofsaham: Film and Video  
Level Limited  
Lewisham Action on Mediation Project (LAMP)  
Lewisham African Development Alliance (LADA)  
Lewisham and Greenwich National Childbirth Trust (NCT)  
Lewisham and Kent Islamic Centre (LAKIC)  
Lewisham Anti-Apartheid Group  
Lewisham Anti-Racist Action Group  
Lewisham Arthouse Ltd  
Lewisham Asian Association (LAA)  
Lewisham Association for Dyslexia Support (LADS)  
Lewisham Befrienders Scheme  
Lewisham Bio-Diversity Partnership  
Lewisham Black Asians Women's Committee  
Lewisham Black Peoples Alliance,  
Lewisham Central Residents Association

Lewisham Centre Management Ltd  
Lewisham Churches Care (LCC)  
Lewisham College  
Lewisham Cycling Campaign (LCC)  
Lewisham Cyclists  
Lewisham Disability Coalition  
Lewisham Ecumenical Borough Deans (LEBD)  
Lewisham Elders Resource Centre (LERC)  
Lewisham Environment Trust  
Lewisham Fire Station (Borough Commander)  
Lewisham Gateway Action Group & Quaggy Waterways AG  
Lewisham Gateway Developments Limited  
Lewisham Independent Association of School Governors  
Lewisham Independent Pensioners Advocacy (LIPA)  
Lewisham Indo-Chinese Community and Chinese Community School  
Lewisham Irish Community Centre (LICC)  
Lewisham Local History Society  
Lewisham Mencap  
Lewisham Methodist Church  
Lewisham Mind (Association for Mental Health)  
Lewisham Multilingual Advice Service  
Lewisham NCT  
Lewisham Nexus Service (LNS)  
Lewisham North District Scouts  
Lewisham Old People's Housing Association (LOPHA)  
Lewisham Opportunity Pre-School (LOPS)  
Lewisham Oxfam Campaigns Group (LOCG)  
Lewisham Park Estate TA  
Lewisham Park Housing Association Ltd (LPHA)  
Lewisham PCT  
Lewisham Peace Council  
Lewisham Pensioners Forum  
Lewisham Pensioners Gazette  
Lewisham Pre-School Learning Alliance (LPSLA)  
Lewisham Refugee Network (LRN)  
Lewisham Samaritans  
Lewisham Seventh Day Adventist Church  
Lewisham Shopmobility  
Lewisham Somali Community Organisation  
Lewisham Speaking Up Advocacy Project  
Lewisham Spiritualist Church  
Lewisham Supportive Housing Project (LSHP)  
Lewisham Talking Newspaper for The Blind (LTN)  
Lewisham Tenants and Leasholders Advice Centre  
Lewisham Toy Library  
Lewisham Trades Union Council (Lewisham TUC)  
Lewisham Triangle Neighbourhood Association  
Lewisham Turkish School  
Lewisham Unitarian Meeting House  
Lewisham United Reformed Church (URC)  
Lewisham Voluntary Information Communication Technology (LWYCC)  
Lewisham Way Youth and Community Centre  
Lewisham Wrestling Club  
Lewisham Young Women's Project & Resource Centre,

Light of the World Church  
Limehouse Software  
Limelight Family Learning Centre  
Loampit Area RA  
Loampit Gospel Hall  
Local Strategic Partnership Support Team  
Logical International  
London Ambulance Service NHS Trust  
London Association For Asian Youth  
London Bubble Theatre Company  
London Buses Limited  
London Business Centres - Cannon Wharf  
London City Airport Consultative Committee  
London City Mission  
London Community College  
London Environmental Adventure Project (LEAP)  
London Farmers Markets  
London Fire and Emergency Planning Authority  
London Gypsy and Traveller Unit  
London Historic Parks and Gardens Trust  
London Narrowboat Project  
London Property Management  
London Regional Transport Authority  
London Transport Users Committee (London Travel Watch  
London TravelWatch  
Longstop Project  
Longton Avenue Residents Association  
Loromah Estates Ltd  
Lower Sydenham Men's Social Club  
Ludwick Mews T & RA  
LXB Properties LTD  
M & D Enterprises  
MACA  
Macdonald Egan Developments plc  
MacDonalds  
Macfadyen RIBA - Aadip  
Macfarlanes  
Mackseys Solicitors  
Magic Book Theatre Co. - Children's Puppet Theatre  
Malham Christian Centre (London City Mission)  
Manor House Gardens Park User Group  
Manor Lee RA  
Marks & Spencer plc  
Marsha Phoenix House  
Martin Robeson Planning Practice (Land Securities Ltd)  
Martineau  
Marvels Area RA  
Marvels Lane Boys Club  
Marvels Lane Community Assoc  
Marvels Lane Pre-School (MLPS)  
Mary Ann Gardens & Albury Street RA  
Mayor's Office for Policing and Crime (MOPAC)  
Mayow Road Hall  
Mbaitoli Association (UK AND NI)

Mbatelo Health and Social Care Project  
McAleer Projects  
McDonald's Restaurants Ltd  
'Me, too' Project/ Dominica Secondary Schools Supporters Association (DASSSA)  
Media for All  
Member PTA HTG, New Cross  
Mentoring Plus Lewisham (M+)  
Meredale Ltd  
Meshwork Productions  
Metropolitan Police Authority  
Metropolitan Police Service  
Midi Music Company  
Milford Towers Community Association  
Millwall Community School (MCS)  
Millwall Football and Athletic Co 1985 plc  
Millwall Properties Limited  
Milton Court Rd/Liardet St TA  
Moat Homes Ltd  
Mobile Operators Association  
Moni Mela Over 50's Club  
Mono Consultants  
Montem Road TA  
Moonshot Phoenix (Moonshot)  
Morden Mount and Heathside Community Toy Library  
MOSAC  
MOT Car Firm  
Mount Zion United Church  
Multicultural Education and Youth Project Lewisham (MCEYP)  
Muslim Women's Support Group  
NAS International Charity  
Nat West Bank plc  
Nathaniel Lichfield and Partners  
National Council of Building Material Producers  
National Federation of Gypsy Liaison Groups  
National Grid Electricity Transmission plc  
NATS LTD  
Network Rail  
Network Rail Infrastructure Ltd  
New Cross Fire Parents Memorial Trust  
New Cross Legal Advice Centre  
New Park Gate Community Association  
New School Campaign  
New Testament Assembly  
New Testament Church of God, Deptford (NTCG Deptford)  
New Vision Day Nursery  
Newgate Property Company  
Newstead Estate Housing Association  
Newstead/Lucorn Close TA  
NHS Property Services Ltd  
Nickel Homes Limited  
Noah's Ark Children's Venture (Macaroni Wood) (NACV)  
North Downham Estate TA  
North Downham Training Project  
Northbrook & Cordwell TA & RA

Northbrook Park Community Group  
Northover Mental Health Resource Centre  
NTL Communications Services Limited  
Nulinx Training & Education  
Oak Residential Ltd  
Objective Corporation  
Osborne, Cowdery, Osborne & Harrison  
Office of Rail Regulation  
Older Women's Network Lewisham (OWN)  
Oldfield King Planning  
Olivet Baptist Church  
One in Four  
Opening Doors (Sydenham)  
Openwide Theatre  
Orexis  
Organisation Details  
Outdoor Advertising Council  
P & R Installations Co Ltd  
Pagoda Gardens Association  
Parent Support Group  
Passfield Tenants Assoc  
Patchwork Community Ltd  
Patients in Partnership Group (PIP)  
Peabody Design Group  
Peabody Estate RA  
Peacock & Smith Ltd  
Pearce & Co  
Pentecostal Assembly  
People's Trust for Endangered Species  
Pepys Community Forum  
Pepys Estate CA & TA  
Pepys Healthy Living Group  
Pepys NC  
Pepys Tenants Action Group (TAG)  
Perry Fields Residents Association  
Perry Mount RA  
Peter Brett Associates LLP  
Petersham Land (Catford) Ltd  
PG Building Contractor Ltd  
Phoenix House  
Phoenix Research & Development Foundation Ltd  
Plan Personnel  
Planning Aid for London  
Planning Issues  
Planning Newspaper  
Planning Perspectives LLP  
Planning Potential  
planning prospects for Dransfield Properties Ltd  
Planware Ltd  
Platform One (Forest Hill Youth Project)  
Playhouse Community Nursery  
Plough & Chilton Tenants & Residents Assoc  
PLUS  
Polecroft Lane Assoc

Port of London Authority  
Positive Body Image  
Practical Action SE London Group  
Premium Pensions Trustees Ltd (Formerly AMP (UK) Trustees Ltd)  
Presentation Housing Partnerships Ltd  
Prince's Trust Volunteers (PTV) - Downham  
Prince's Trust Volunteers (PTV) - Woolwich  
Prior Manton Tuke Powell  
Providence Project  
Providence Strict Baptist Chapel  
Psychro Management Ltd  
Public Transport Users  
Purpose for Living  
Quaggy Development Trust (formerly Orchard Community Project)  
Quaggy Waterways Action Group  
Quantum Project  
Quo Vadis Trust  
QWAG  
R & J Supplies Ltd  
R B Kensington & Chelsea  
R B Kingston upon Thames  
R P Property Limited  
R. Woodfall Opticians  
Randisbourne Gardens TA  
Rapleys LLP  
Ravensbourne Estate Community Association (RECA)  
Ravensbourne Project (formerly Ravensbourne Toy Library and Ravensbourne Link)  
Ravensbourne Valley Preservation Society  
Rawlinson House & Mercator Road Estate  
Reconcilers Evangelical Ministries (REM)  
Redeemed Christian Church of God (RCCG)  
Redrow Homes  
Refuge  
Reigate Action Group  
Reliant Building Contractors  
Religious Society of Friends (Quakers), Forest Hill  
Rendell Planning  
Replanning  
Representative Brockley Society  
Revival Centre Trust (RCT)  
RGB Planning  
Richard Coleman City Designer  
Right Direction Supplementary/Community Education  
Rippon Development Services  
River Thames Society  
Road Haulage Association  
Robert Morley and Company Limited  
Robinson Escott Planning  
Rockbourne Youth Club  
Rolfe Judd Planning  
Romborough Gardens Allotments Association  
Ronald G Radley & Associates Chartered Town Planners  
Rosenthal House TA  
Royal Borough of Greenwich



RPS Planning  
Rushey Green RA  
Rushey Green Residents  
Russell Associates Architects  
Rutland Sports and Social Club  
Ryculff Square RA  
S C Motor Factors Ltd  
S G Smith Motors  
Sainsbury's Supermarkets Ltd  
Sainsbury's Supermarkets Ltd  
Saint Mary's Conservation Area Committee  
Saint-Gobain  
Salvation Army Deptford Corps  
Salvation Army Goodwill Old People's Centre  
Salvation Army Hall (Catford)  
Salvation Army Hall (Lewisham)  
Sandbourne Road T & RA  
Sarcoidosis and Interstitial Lung Association (SILA)  
Savacentre  
Save World Ministry International  
Savills  
Savills (Thames Water)  
Savills Commercial Ltd  
Sayes Court TA  
Schoolhouse Education Project  
Scott Brownrigg  
SE London Green Chain  
Sea-Kids Trust  
Secular Organizations for Sobriety (SOS South London)  
Sedgehill Community Centre  
Sellwood Planning  
Senior Citizens and Handicapped Club  
Shaftesbury Christian Centre,  
Shardeloes Road RA  
Sharpes Global Trading  
Sheel Pharmacy Health World  
Sheenewood TA  
Sherwood Court (Lewisham) Limited  
Shire Consulting  
Shire UK  
Sickle Cell Action Network (SCAN)  
Sierra Leone Community Forum  
Signal  
Signet Planning  
Singh Jhas  
Sivan Kovil Trust  
Slough Estates plc  
Smith Jenkins Town Planning Consultants  
SMPA  
Sole Trader Natures Name Brand  
Somaliland Somali Lewisham Community  
Somerset Gardens Residents Association  
Somerville Adventure Playground  
Something Fishy

South Court TA  
South East and East of England Royal Mail Group  
South East Group/London Baptist Centre  
South East London Bangladesh Women's Association  
South East London Campaign for Press and Broadcasting Freedom (SELCPBF)  
South East London Chamber of Commerce  
South East London Community Advice Service  
South East London Tamil Elders and Family Welfare Association  
South East London World Development Movement (WDM)  
South East Muslim Educational and Cultural Society (SEMECS)  
South Eastern Trains Ltd  
South London and Maudsley NHS Foundation Trust  
South London Press  
South London Turkish Family Association  
Southern Africa Aids Foundation (SAAF)  
Southern Railway Limited  
Sport England  
Sportsbank, Engleheart, Shorndean Tenants & Residents Association (SESTRA)  
Spt. Catford Police Station  
Sri Vel Murugan Aalayam  
St Andrew the Apostle's Church  
St Andrews Youth Centre - Young Women's Group  
St Andrews Youth Club  
St Bartholomews Primary  
St Christopher's Fellowship (SCF) (Lewisham Branch)  
St Dunstons College Educational Foundation  
St Dunstan's Educational Foundation  
St Hilda's Church and Crofton Park Community Centre  
St James Developments Ltd  
St John the Baptist Church  
St Johns Conservation Area  
St John's Society  
St Laurence Church and Centre  
St Luke's Church, Downham  
St Martin Property Investments Ltd  
St Mary Magdalen's Catholic Church  
St Mary's Conservation Area  
St Mary's Youth Club  
St Matthew Academy  
St Michael and All Angels C of E Church  
St Modwen Developments Limited  
St Modwen Developments Ltd  
St Mungo's Pagnell Street Hospital  
St Nicholas with Christ Church  
St Peter's Church, Brockley  
St Saviour's RC Primary School  
St Stephen and St Mark's Church  
St Swithun's Young Black Community Link  
St William of York School  
St. Augustine Church  
St. Bartholomew Church  
St. Catherine-On-The-Hill Church  
St. Catherine's Drive TA  
St. Christopher's Hospice

St. George Church St Paul  
St. Germans Rd RA  
St. Gregorios Church  
St. Hilda Church  
St. James Church  
St. John with Holy Trinity Deptford  
St. Johns Conservation Association  
St. John's Society  
St. John's United Reformed Church  
St. Luke Church  
St. Mark's Youth & Community Centre  
St. Mary the Virgin Parish Church  
St. Mary's Centre  
St. Mary's Youth Club  
St. Michael & All Angels Church  
St. Michaels Community Centre  
St. Michael's United Church (Daughter Church)  
St. Mildreds Residents Group  
St. Pauls Deptford  
St. Peter's Church,  
St. Philip The Apostle Church  
St. Saviour Church  
Stainer After School Association (SASA)  
Stainton Rd TA  
Stakeholder and Networks Officer Marine Management Organisation  
Stanstead Grove RA  
Stefan Zins Associates  
Steve Biko Organisation  
Stewart Ross Associates  
Stiles Harold Williams  
Stoneycroft TA  
Stroke Association Lewisham  
Strutt & Parker  
Studio One  
Suncroft Residents Association  
Supreme Animal Foods  
SUSTRANS  
Sydenham Apostolic Church  
Sydenham Citizens Advice Bureau  
Sydenham Gardens  
Sydenham Green TA  
Sydenham Hill TA  
Sydenham NC  
Sydenham Park Conservation Society  
Sydenham Society  
Sydenham Somali Community  
Sydenham Traders  
Sydenham Wells Park UG  
Synergy Planning and Property Consultants Ltd  
T P Bennett Partnership  
Tamil Academy of Language and Arts (TALA)  
Tamil Community & Youth Centre  
Tanners Hill TA  
Tarleton Woods Association

Taunton Rd TA  
Telegraph Hill Centre (THC)  
Telegraph Hill Neighbourhood Council  
Telegraph Hill Society  
Temple Lifts Ltd  
Tenants Action Group, Pepys  
Ten-Em-Bee (Sport and Art Development Centre)  
Terence O'Rourke plc  
Terry Farrell & Company  
Tesco Property Acquisition and Town Planning  
Tesco Stores Ltd  
Tewkesbury Lodge Estate Residents Association  
Thames Water Utilities Ltd  
Thameslink 2000 Project  
Thamesmead Business Services Ltd  
The Lammas Green & Otto Close RA  
The Airport Director, Biggin Hill Airport  
The Archibald Corbett Society  
The Bell Cornwell Partnership  
The Berkeley Group plc  
The Boots Co plc  
The Castle Climbing Centre  
The Church Commissioners  
The Clarendon Hotel  
The Coal Authority  
The Department for Transport  
The Department of Health  
The Downes Planning Partnership  
The Firs TA  
The Here for Good Community Centre  
The House Builders Federation-London  
The Institute of Music and Technology  
The Jimmy Mizen Foundation  
The JTS Partnership LLP  
The Lewisham Hospital NHS Trust  
The London Forum of Greater London Amenity Societies  
The London Wildlife Trust  
The Milton BVI Group  
The Planning Bureau  
The Pond Conservation Group  
The Prudential Assurance Group  
The Safeguarding Consultee, London City Airport  
The South London Church Fund and Southwark Diocesan Board of Finance  
The Tabernacle  
The Telegraph Hill Society  
The Theatres Trust  
The Traveller Movement  
The Woodland Trust  
Theatregoers Club of Great Britain  
Thomas Wrenn Homes Ltd  
Timothy Associates  
Tower Foundation  
Town Planning Network Rail  
tp bennett LLP

Transport for London  
Transport Planner Docklands Light Railway  
Travellers Law Reform Coalition  
Tremaine Close RA  
Trinity Estate T & RA  
Trinity United Reformed Church, Catford  
Triple X Support Group  
Trunking Limited  
Turkish Cypriot Association  
Turkish Elders Club  
Turley Associates  
Turnhold Properties Limited  
Twentieth Century Society  
Two's Company  
UGC Properties Ltd  
Under Pressure  
Unique Pub Properties Ltd  
Unique Salvation Ministries (USM)  
United Unique Continental Centre for the Disabled (UUCD)  
University Hospital Lewisham  
University of Westminster  
Upper Norwood Association for Community Care (UNACC)  
Upwood Road & Horn Park Lane RA  
Urban Research Lab  
Users and Friends of Manor House Library  
U-Turn Recovery Project  
Vaughan Williams T & RA  
Veolia Environmental Services SELCHP Ltd  
Vietnamese Refugee Community  
Viney Road Tenants Association  
VLH Associates  
Voluntary Action Lewisham  
Voluntary Care Centre (VCC)  
Volunteering Lewisham  
Vulcan Youth Club  
W S Atkins  
Walker Morris  
Warrenview Limited  
Wells Park TA  
West & Partners  
Westminster Council  
WH Smith Plc  
Wickes  
Winslade TA  
Wm Morrison Supermarkets Plc  
Women in Need Foundation (WIN)  
Women's National Commission  
Women's Royal Voluntary Service (WRVS)  
Woodcraft Folk  
Woodland Trust  
Working with Men (DIY Dads)  
Workspace Group PLC  
World Heritage Site Coordinator London Borough Of Greenwich  
Wydeville Manor TA

YMCA of Lewisham, Lambeth and Southwark  
Young African Women Organisation  
Young Lewisham Project (YLP) (also known as Young Lewisham Workshop)  
Youth A.I.D. Lewisham  
Youth Focus (also known as Youth Exchange Association or Youth Action Lewisham)  
Youth Offenders Project  
Youth Participation and Engagement Officer London Borough of Lewisham  
Zoom  
Zuriya Theatre Company (ZTC)