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# London Borough of Lewisham Local Development Framework

## Core Strategy

Development Plan Document (DPD)

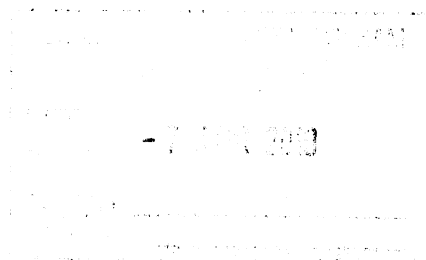
Publication Stage Representation Form

Ref:

For official use only

**Please return your completed form to the London Borough of Lewisham by 5pm  
Tuesday 6<sup>th</sup> April 2010**

- By post to  
FREEPOST RRZZ TLHU GKZS  
Planning Service  
London Borough of Lewisham  
5<sup>th</sup> Floor, Laurence House  
1 Catford Road  
London SE6 4RU



or

- By e-mail to [planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk)

**You may also make your representation online without the need to use this form.**

- Online at <http://consult.lewisham.gov.uk/portal>

For further information, or to request extra representation forms please phone  
020 8314 7400 or e-mail [planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk) .

This form has two parts

Part A – Personal Details

Part B – Your representation(s).

Please fill in a separate sheet for each representation you wish to make.

**Part A**

1. Personal Details\*

2. Agent's Details (if applicable)

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title MS

First Name ANNABEL

Last Name MCLAREN

Job Title (where relevant) VICE CHAIR

Organisation (where relevant) SYDENHAM SOCIETY

Address Line 1 35 BISHOPSTHORPE RD

Line 2 SYDENHAM

Line 3 SE26 4PA

Line 4 \_\_\_\_\_

Post Code SE26 4PA

Telephone Number 020 8778 6914

E-mail Address (where relevant) annabelmclaren  
e myriadbooks.  
co.uk

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**Part B – Please use a separate sheet for each representation**

Name or Organisation : SYDENHAM SOCIETY (ANNABEL MCLAREN)

3. To which part of the Core Strategy does this representation relate?

Paragraph 6.110 Policy SPATIAL Policy 4 Proposals Map BELL GREEN 6.110

4. Do you consider the Core Strategy is:

4.(1) Legally compliant Yes  No

4.(2) Sound\* Yes  No

*\*The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form*

*If you have entered **No** to 4.(2), please continue to Q5.  
In all other circumstances, please go to Q6.*

5. Do you consider the Core Strategy is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

THE DESIGNATION OF BELL GREEN AS A RETAIL PARK DEVIATES FROM PLANNING POLICY STATEMENT 4 (PLANNING FOR SUSTAINABLE ECONOMIC GROWTH, DEPT OF COMMUNITIES & LOCAL GOVT, DEC 09). IT IS NOT EFFECTIVE SINCE THE CURRENT DESIGNATION HAS NOT, AND CANNOT, BE DELIVERED.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.  
(Continue on a separate sheet /expand box if necessary)

PLEASE SEE THE ATTACHED DOCUMENT.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

- No, I do not wish to participate at the oral examination
- Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

IN ORDER TO PUT THE CASE FOR A REVISED DESIGNATION FOR BELLGREEN.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: Audrey Green

Date: April 1st 2010.

# Notes to accompany Representation Form for Development Plan Documents

## 1. Introduction

1.1 The Core Strategy is being published in order for representations to be made prior to submission. The representations will be considered alongside the published Core Strategy when submitted, which will be examined by a Planning Inspector. The Planning and Compulsory Purchase Act 2004 (as amended)<sup>1</sup> (the 2004 Act) states that the purpose of the examination is to consider whether the Core Strategy complies with the legal requirements and is 'sound'.

- If you are seeking to make a representation on the way in which Lewisham has prepared the published Core Strategy, it is likely that your comments or objections will relate to a matter of legal compliance.
- If it is the actual content on which you wish to comment or object it is likely that it will relate to whether the published Core Strategy is justified, effective, or consistent with national policy.

## 2. Legal Compliance

2.1 The Inspector will first check that the published Core Strategy meets the legal requirements under s20(5)(a) of the 2004 Act before moving on to test for soundness. You should consider the following before making a representation on legal compliance:

- The published Core Strategy should be within Lewisham's current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by Lewisham, setting out the Local Development Documents it proposes to produce over a 3 year period. If the Core Strategy is not in the current LDS it should not have been published for representations. The LDS is available on the Lewisham website<sup>2</sup>.
- The process of community involvement for the Core Strategy should be in general accordance with the Lewisham's Statement of Community Involvement<sup>3</sup>. The Statement of Community Involvement (SCI) is a document which sets out Lewisham's strategy for involving the community in the preparation and revision of Local Development Framework (including the Core Strategy) and the consideration of planning applications.

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<sup>1</sup> View the 2004 Act at:

[http://www.opsi.gov.uk/acts/acts2004/ukpga\\_20040005\\_en\\_1](http://www.opsi.gov.uk/acts/acts2004/ukpga_20040005_en_1)

View the amending 2008 Act at: [http://www.opsi.gov.uk/acts/acts2008/pdf/ukpga\\_20080029\\_en.pdf](http://www.opsi.gov.uk/acts/acts2008/pdf/ukpga_20080029_en.pdf)

<sup>2</sup> View the Lewisham LDS at:

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

<sup>3</sup> View the Lewisham SCI at:

<http://www.lewisham.gov.uk/Environment/Planning/PlanningPolicy/StatementCommunityInvolvement.htm>

- The published Core Strategy should comply with the Town and County Planning (Local Development) (England Regulations) 2004 (as amended)<sup>4</sup>. When publishing the Core Strategy Lewisham must also publish the documents prescribed in the regulations, and make them available at their principal offices and their website. Lewisham must also place local advertisements and notify the organisations listed in the regulations, and any persons who have requested to be notified.
- Lewisham is required to provide a Sustainability Appraisal Report when they publish a Core Strategy<sup>5</sup>. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. The Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors.
- The published Core Strategy should have regard to national policy and conform generally to the London Plan<sup>6</sup>. This sets out the policies for London in relation to the development and use of land and forms part of the development plan for Lewisham.
- The published Core Strategy must have regard to Lewisham's Sustainable Community Strategy (SCS)<sup>7</sup>. The SCS was prepared by the Local Strategic Partnership which represents a range of interests in the Lewisham Borough. The SCS was subject to consultation but not to an independent examination.

### 3. Soundness

3.1 Soundness is explained fully in Planning Policy Statement 12: Local Spatial Planning in paragraphs 4.36 – 4.47, 4.51 and 5.52 and the boxed text<sup>8</sup>. The Inspector has to be satisfied that the published Core Strategy is justified, effective and consistent with national policy. To be sound a published Core Strategy should be:

- Justified  
This means that the published Core Strategy should be founded on a robust and credible evidence base involving:
  - Evidence of participation of the local community and others having a stake in the area
  - Research/fact finding: the choices made in the plan are backed up by facts  
The published Core Strategy should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives

<sup>4</sup> View the 2004 Regulations at: <http://www.opsi.gov.uk/si/si2004/20042204.htm> View the 2008 amending Regulations at: [http://www.opsi.gov.uk/si/si2008/pdf/uksi\\_20081371\\_en.pdf](http://www.opsi.gov.uk/si/si2008/pdf/uksi_20081371_en.pdf) View the 2009 amending Regulations at: [http://www.opsi.gov.uk/si/si2009/pdf/uksi\\_20090401\\_en.pdf](http://www.opsi.gov.uk/si/si2009/pdf/uksi_20090401_en.pdf)

<sup>5</sup> View the Sustainability Appraisal at: <http://consult.lewisham.gov.uk/portal>

<sup>6</sup> View the London Plan at: <http://www.london.gov.uk/thelondonplan/>

<sup>7</sup> View the Lewisham SCS at: <http://www.lewisham.gov.uk/CouncilAndDemocracy/StrategiesPlans/StrategyDocuments/SustainableCommunityStrategy.htm>

<sup>8</sup> View at <http://www.communities.gov.uk/publications/planningandbuilding/pps12lsp>

should be realistic and subject to sustainability appraisal. The published Core Strategy should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

- Effective

This means the published Core Strategy should be deliverable, embracing:

- Sound infrastructure delivery planning
- Having no regulatory or national planning barriers to delivery
- Delivery partners who are signed up to it
- Coherence with the strategies of neighbouring authorities.

The published Core Strategy should also be flexible and able to be monitored.

The published Core Strategy should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen.

The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the published Core Strategy should make clear that major changes may require a formal review including public consultation. Any measures which the Lewisham has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report<sup>9</sup>. This report is produced each year by Lewisham and will show whether the Core Strategy needs amendment.

- Consistent with national policy

The published Core Strategy should be consistent with national policy. Where there is a departure, Lewisham must provide clear and convincing reasoning to justify their approach. Conversely, you may feel that Lewisham should include a policy or policies which would depart from national or regional policy to some degree in order to meet a clearly identified and fully justified local need, but they have not done so. In this instance it will be important for you to say in your representations what the local circumstances are that justify a different policy approach to that in national or regional policy and support your assertion with evidence.

- 3.2 If you think the content of the published Core Strategy is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

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<sup>9</sup> View Lewisham's Annual Monitoring Reports at:  
<http://www.lewisham.gov.uk/Environment/Planning/PlanningPolicy/LocalDevelopmentFramework/AnnualMonitoringLDF.htm>

- Is the issue with which you are concerned already covered specifically by any national planning policy or in the London Plan? If so it does not need to be included.
- Is what you are concerned with covered by any other policies in the published Core Strategy on which you are seeking to make representations or in any other document in the Lewisham's Local Development Framework (LDF). If so, there is no need for repetition between documents in the LDF.
- If the policy is not covered elsewhere, in what way is the published Core Strategy unsound without the policy?
- If the published Core Strategy is unsound without the policy, what should the policy say?

#### **4. General advice**

- 4.1 If you wish to make a representation seeking a change to the published Core Strategy you should make clear in what way the published Core Strategy is not sound having regard to the legal compliance check and three tests set out above. You should try to support your representation by evidence showing why the published Core Strategy should be changed. It will be helpful if you also say precisely how you think the published Core Strategy should be changed. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.
- 4.2 Where there are groups who share a common view on how they wish to see the published Core Strategy changed, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.
- 4.3 Further detailed guidance on the preparation, publication and examination of Core Strategies is provided in *PPS12* and in *The Plan Making Manual*<sup>10</sup>.

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<sup>10</sup> View at <http://www.pas.gov.uk/pas/core/page.do?pageId=51391>



## **Spatial policy 4, sections 6.2, 3**

### **Bell Green, local hub**

Bell Green is currently designated as an “out-of-centre retail park” within the Council’s retail hierarchy (Spatial Policy 4, local hubs).

In the view of the Sydenham Society Bell Green should not be designated solely as an out-of-centre retail park but should be re-designated as a mixed use site involving retail, employment and other uses eg leisure, residential and other uses (eg it could be the site of a recycling centre for the production of ‘green’ energy).

Reasons for re-designation:

**1 The current retail policy cannot be delivered**, especially in the current economic climate. Since planning permission was given to J Sainsbury for the erection of a Savacentre hypermarket in 1993 no further retailer has been able to deliver further retail on the site. It is the view of the Society that if the “retail vision” for Bell Green could not be delivered in a 17-year period (largely a period of economic buoyancy) then it is almost impossible to see this succeeding in a period when the economy is contracting.

**2 The Core Strategy plan identifies a number of Mixed Use Employment Locations** in 6.24-6.36 and sets out a number of advantages presented by these sites in achieving regeneration, providing a “sense” of place” and providing new landmarks and links. **We believe that all of these criteria can also be identified at Bell Green.**

**3. Bell Green also has many of the advantages of good transport, accessibility and local employment opportunities which are identified in the Core Strategy (Spatial Policy 1) as being advantageous when developing Regeneration and Growth Areas.** In the case of Bell Green these are:

- Transport: Bell Green is highly accessible with good rail links from Lower Sydenham station, a number of key bus routes which terminate or stop centrally on the site, and the Route 21 cycle path which passes just to the rear of the site and links Lewisham and Catford Centres with Croydon;

- Proximity to a large employment site. Bell Green is close to the workshops and factories of Kangley Bridge Rd Industrial Estate and Stanton Square.

**4. Other successful employment and mixed-use locations close to Bell Green show the demand for such uses and the likely success in delivering such a strategy.** Close to the Bell green site and adjoining Lower Sydenham station and the railway line are the Stanton Square and Kangley Bridge Road Industrial Estates both of which have good quality light industrial units, workshops and warehouses interspersed with housing. Both of these areas are in high demand by local companies with few empty premises and have a good record of providing employment. In the opinion of the Society, there is no reason why Bell Green, re-designated as a Mixed Use Employment Location could not replicate this success, albeit with a different mix of housing, industrial and leisure uses.

**5. Current developments on site, the move away from 'out of town' retail parks and the unsustainability of car-based shopping, plus likely future demand for local employment and green energy mean that the phase 2 part of the Bell Green site should be re-designated as a Mixed Use Employment Location.** The phase 3 part of the Bell Green site (to the front of Sainsburys) is already designated for housing (a designation which was upheld by the Planning Inspector after the 2006 planning inquiry). The site has been the subject of recent applications for housing. It is fully expected that a residential scheme will be delivered on the site.

National policy, as set out in Planning Policy Statement 4 (Dept of Communities and Local Government, Dec 09) and the move by retailers back to town centres (as evidenced by the expansion of convenience and smaller format town centre stores by all the major supermarkets) means that the phase 2 site is unlikely to be developed as a major retail location.

Whilst it is accepted that the phase 2 part of the site is not suitable for housing, it is suitable for mixed-use employment and light industry. In the Society's view, this part of the site would be highly suitable for development as a provider of 'green' energy (by means of an anaerobic digester) to be located to the rear of the

gasholders. Government funding is available for green energy initiatives such as these and would provide additional employment.

Wilm 1

**Jericho, Matt**

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**From:** HUTCHINSON, John [HUTCHINSONJ@parliament.uk]  
**Sent:** 06 April 2010 09:08  
**To:** planning policy  
**Cc:** 'annabel mclaren'  
**Subject:** FW: Sydenham Society's response to the Core Strategy Development Plan document

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Dear Planning Policy Team

Further to the message to you sent by email and post by Annabel McLaren on 2<sup>nd</sup> April, I am sending again this same message to which I have appended a note on the Urban Energy Concept based on the National Grid Report of the same title published last year.

Yours faithfully

John Hutchinson  
Conservation Architect  
Sydenham Society member

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Dear Planning Policy team

Please see below the Sydenham Society's response to the Core Strategy (Development Plan document - proposed submission version, Feb 2010)

I have also sent the material below to LB Lewisham with the representation form in a hard copy version to the Freepost address. I hope that it will arrive by Tuesday April 5. I am emailing it again as a back-up; I have been unable to locate on the Planning Portal the online representation form, and so I hope you will accept this submission if my mailed version does not arrive by the deadline.

In addition to the material below my colleague, John Hutchinson, will be emailing an addendum.

Kind regards,

Annabel McLaren  
Vice chair, Sydenham Society  
35 Bishopsthorpe Road  
London SE26 4PA  
T 020 8778 6914  
M 07811 460 641  
F 020 8244 6862

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06/04/2010

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have a good record of providing employment.

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Annabel McLaren  
April 2 2010

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#### **Addendum: Urban Energy Concept**

**The Bell Green Site was formerly a gas works which converted coal into town gas by crude pyrolysis. The process was wasteful and polluting. Gas holders remain on the site as protected structures. Coal and other supplies were delivered by rail. Extensive sidings connected to the Southeastern Railway's line from London Bridge to Selsdon which facilitated coal transportation and off-loading.**

**The Sydenham Society considers that UK government policy is leading to prioritising this site for return to gas supply in the form of bio-methane, synthetic gas and some hydrogen with additional facilities for sustainable electricity**

generation. Policy drivers are as follows:

1. The Climate Change Act 2008 (80% reduction in greenhouse gas emissions by 2050).
2. Renewable Heat Initiative (RHI) to be delivered by April 2011 which, inter alia, entails the introduction sustainably produced bio-methane to the national gas supply network.
3. UK government has a policy commitment to supply 15% of UK energy from renewable sources by 2020.

The Society proposes that a consortium be recruited, with National Grid, the site co-owner, and Network Rail as essential partners, to construct an urban power station that would convert bio-mass arising as municipal waste into bio-gas, probably by anaerobic digestion. The gas would be purified on site. CO<sub>2</sub> arising would be diverted to greenhouses or poly-tunnels on site to promote intensified growth of high value fruit and vegetable. This facility would be franchised. Alternatively, the CO<sub>2</sub> could be used to promote the growth of algae in dedicated vessels which could then be used as a source of bio-gas or syn-gas. Methane (CH<sub>4</sub>) would be supplied into the gas mains. Existing gas holder would be used for storage. The urban power station would also convert waste plastic from a mixed waste stream into synthetic gas by thermo-chemical means such as the patented INEOS process as presented to the annual conference of the NNFFC in November last year. Syn-gas could be used to make bio-diesel, chemical feedstock for the manufacture of bio-plastic or to make hydrogen and CO<sub>2</sub>. The hydrogen could be used either to generate electricity or to fuel electric cars and vans running on fuel cells. Waste heat from the INEOS process could be used to generate electricity on site, which could then be supplied to the grid. All materials entering and leaving the site would be carried by rail, principally during the hours between midnight and 5.00am so as not to interfere with commuter trains.

Reference Document:

Urban Energy Concept by Mouchel for National Grid: 2009 (contact Janine Freeman, Head of Sustainable Gas Group, National Grid - [janine.freeman@uk.ngrid.com](mailto:janine.freeman@uk.ngrid.com))

Estimated cost of bio-methane = £62 MWh<sup>2</sup> (National Grid statistic)

J.A Hutchinson: 6<sup>th</sup> April 2010

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**Jericho, Matt**

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**From:** annabelmclaren@googlemail.com on behalf of annabel mclaren  
[annabelmclaren@myriadbooks.co.uk]  
**Sent:** 03 April 2010 00:18  
**To:** planning policy  
**Cc:** HUTCHINSON, John  
**Subject:** Sydenham Society's response to the Core Strategy Development Plan document

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 Vice chair, Sydenham Society  
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residential scheme will be delivered on the site.

National policy, as set out in Planning Policy Statement 4 (Dept of Communities and Local Government, Dec 09) and the move by retailers back to town centres (as evidenced by the expansion of convenience and smaller format town centre stores by all the major supermarkets) means that the phase 2 site is unlikely to be developed as a major retail location.

Whilst it is accepted that the phase 2 part of the site is not suitable for housing, it is suitable for mixed-use employment and light industry. In the Society's view, this part of the site would be highly suitable for development as a provider of 'green' energy (by means of an anaerobic digester) to be located to the rear of the gasholders. Government funding is available for green energy initiatives such as these and would provide additional employment.

Annabel McLaren  
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