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01 March 2018

Dear Sadiq,

Re: London Borough of Lewisham's response to the Draft New London Plan

I am writing in response to public consultation on the Mayor of London's Draft New London Plan (hereafter referred to as the Plan).

The London Borough of Lewisham are broadly supportive of the new Plan and recognise the many and varied challenges that are facing the capital over the coming period; including those around land, housing, infrastructure and the environment. The Plan seeks to provide a tenacious strategic planning framework and contains a set of ambitious and integrated policies that, when taken together, form a comprehensive approach towards the development of London over the next 20-25 years. It is acknowledged that the Plan signifies a step change from the current policy approach and Lewisham is pleased to see the many ways in which the Mayor's proposed policies align with the Council's aspirations and the work already underway in the borough, including around Catford town centre and in the Bakerloo Line Extension (BLE).

The Mayor's focus on Good Growth appears to be a step in the right direction where it recognises that development needs to be re-balanced to better integrate not only population growth and an increased supply of homes, but also supporting a more socially integrated and sustainable city. The Plan's aim to better integrate housing, social, economic, cultural, environmental and transport policies is welcomed, and it is hoped that this policy approach is reflected in the Mayor's priorities when funding and delivering key projects in London.

Set out below is Lewisham's response on the strategic elements of each of the proposed chapters of the Plan. Within this key issues have been highlighted, including points for clarification and any concerns where relevant.

This strategic response is then followed by a more detailed 'schedule of comments' on individual policies, paragraphs or figures of the Plan where relevant.

Chapter 1 Planning London's Future (Good Growth Policies)

Lewisham is generally supportive of the Good Growth principles as detailed in policies GG1 – GG6, which form a central and recurrent theme throughout the Plan, and which inform the more detailed policies that follow. Many of the principles embodied in the concept of Good Growth around better integrating policies on housing, social, economic, cultural, the

environment, and transport, and the aspiration to re-balance the narrative around development which is accompanied by a more socially integrated and sustainable city, have formed part of the work already taken forward by the Council, and are reflected in the high quality developments that have been delivered within the borough.

The Council would welcome the opportunity to work with the Mayor in further realising these aspirations, and would welcome further information and discussion on how the more detailed objectives arising from the Good Growth agenda will be reflected in the Mayor's priorities when funding and delivering key projects in London. By virtue of the Plan's ambitious strategic aspirations and the very detailed policy considerations proposed, it is likely that a degree of tension will arise between policy aspirations, and negotiations will likely occur around key strategic priorities where competing needs arise. The Council will need to be leading this debate at the local level to reflect both strategic and local priorities in Lewisham.

In this regard, while Lewisham are broadly supportive of the approach proposed, it is recognised that this approach will raise a number of questions around the additional demands that will likely be placed on London Boroughs and the subsequent resourcing pressures that are likely to be felt in implementing much of the detailed policy proposed within the Plan. When taken in the round, this new agenda and the detailed policies that are included may necessitate further consideration, to allow Local Authorities to be in a better position to resource the delivery of the new Plan.

Chapter 2 Spatial Development Patterns

Lewisham strongly support the commitment given to Phase 1 of the BLE and the recognition that investment in this key piece of transport infrastructure, to serve Old Kent Road, New Cross Gate and Lewisham, will both improve connectivity, increase the capacity and resilience of the transport network and reduce journey times, as well as unlocking development opportunities by supporting new jobs and homes in these locations. We feel strongly that the Plan should go further by providing a commitment to how this essential piece of infrastructure will be funded and delivered within the timeframe proposed by the Mayor.

Whilst the delivery of Phase 1 of the BLE is a priority for Lewisham and the wider South East, it is clear that the Plan should set out a commitment to Phase 2 of the BLE, extending from Lewisham, through Catford and beyond, with a commitment to utilise Mayoral CIL funds including MCIL2 and other potential sources of funding. This would greatly enhance PTAL levels which in turn will increase the share of journeys made by foot, cycle or public transport and provide opportunities to unlock development in Catford town centre, sites within the south of the borough, and the wider South East area. The impact of the proposed BLE locally over the plan period will be acute, as issues exist relating to safeguarding the route and key sites, the timely delivery of associated infrastructure and development, and specific concerns around the implications of re-locating Council services. Greater certainty in a commitment to BLE Phase 1 and Phase 2 will significantly ease these pressures by providing a transparent and clear agenda in this regard.

We strongly support the retention of the two Opportunity Areas within Lewisham (New Cross/Lewisham/Catford OA and Deptford Creek/Greenwich Riverside OA), as contained in policy SD1. These designations reflect the Councils aspirations for developing these areas and would continue to provide strategic support to the work being planned and undertaken within these areas. The Council has a number of clear aspirations within these OAs, and would support a clearer and more precise approach to key strategic issues including infrastructure, such as the BLE and the realignment of the A205 road through Catford town centre.

We support the overall approach applied to town centre development in policies SD6-SD9 which provide strategic support to the work being planned and undertaken by the Council within these areas, including intensifying Lewisham and regenerating Catford town centre. We are pleased that Figure A1.1 recognises the future potential of Lewisham to achieve Metropolitan Town Centre status and the recognition of the work planned and underway to meet this aspiration. It is felt that New Cross/New Cross Gate should be reclassified as a Major Town Centre given the intensified transport links and the development opportunities arising from the BLE that are proposed within the new Plan, and to reflect the existing opportunities being realised within this area.

We also support the Strategic and Local Areas for Regeneration as a means to tackle deprivation and inequality, whilst recognising that the long-term success of policy SD10 will likely be dependent upon major infrastructure investment, such as BLE, helping to unlock regeneration opportunities to their greatest potential, and the Council would welcome the opportunity to work with the Mayor on the funding and delivery of critical infrastructure.

Chapter 3 Design

Lewisham are broadly supportive of the design policies in the Plan, including D1-D8, however concerns exist around the potential unintended consequences of the removal of the density matrix, and concerns exist around a number of these policies. The Council has consistently delivered high quality design-led development within the borough and we welcome the continued emphasis on design as a key consideration in the capital, whereby Local Authorities including Lewisham continue to be design advocates. Nevertheless the removal of the density matrix may unintentionally raise developer and landowner expectations around the appropriate scale of developments. Whilst the Council welcomes the approach to tall buildings whereby the Local Authority has the opportunity to define what 'tall' is, the removal of the density matrix and the approach to OAs where we are looking to the future context to establish what is 'tall', may create difficult challenges in resisting buildings that are not appropriate in their context. Further clarification around the design-led approach to optimising housing density (policy D6) and the approach to tall buildings (policy D8) should recognise that whilst tall buildings have a place in parts of London, it is the quality of placemaking that is key.

Whilst the principles embodied in the design policies are broadly supported, a degree of concern exists around the implementation of these, and the likely Local Authority resourcing implications of these proposed policies particularly where detailed policy requirements have been introduced. Further consideration may need to be given to how these detailed policies could inadvertently lead to a more protracted pre-application and planning application process, which additionally burdens both the Council and applicants, and which could compromise the delivery of high quality development in a timely manner.

The Council welcomes the approach whereby local character and design has a stronger role in the planning and development process, and many of the Plan policies provide the opportunity to address local design issues. It is however recognised that many policies within this chapter will have significant implications insofar as they advocate for a range of documents that are likely to have to be prepared by Local Authorities to sit beneath Local Plans, such as Design Codes and Character Assessments. The resourcing implications of this may require further consideration by the Mayor in order to secure Good Growth, and to guide development in the absence of the density matrix.

As a strategic plan for London, it is felt that the new Plan should continue to work on the success of previous plans which provided a strong strategic direction on design, and which allowed for local responses to both strategic and local priorities. In this regard a number of questions are raised by policies D9 –D11, which appear to stray beyond a strategic focus on design and which also delve into areas beyond the planning remit, such as areas covered by

the Building Control regime. As such, particular concerns exist around the introduction of policies around Fire Statements and we seek further guidance from the Mayor on how to assess these technical reports.

We are generally supportive of the principles with policies D12 and D13 whilst recognising that these policies raise a number of questions regarding the practical implementation of the more detailed policy requirements, and further consideration may need to be given to this.

Chapter 4 Housing

Lewisham has an excellent track record in delivering housing over and above its targets. We are proud to look at innovative and new ways of achieving this and we are pleased that the Plan matches our ambitions.

Lewisham are generally supportive of the housing policies including recognition of the temporary role that meanwhile uses can play in policy H4, the provision of specialist accommodation for older persons and students in policies H14, H15 and H17, the role that Build to Rent in policy H13 and the large-scale purpose built shared living schemes in policy H18 have to play in relation to the housing market; providing they are well managed and maintained. We are also supportive of the principle of no net loss of affordable housing in estate regeneration schemes in H10, providing local circumstances can be taken into account.

The Council considers that PTAL is a simplistic measure of connectivity and accessibility. It may not always be appropriate to optimise the potential for housing delivery on sites with existing or planned public transport access levels (PTALs) of 3-6, without first taking a more sophisticated look at the accessibility and character of the area surrounding a site. Further consideration should be given to this point throughout the Plan and especially in policies H1 and H2.

The Council supports the concept of utilising land more efficiently, introducing more variety into the housing market and placing greater importance on the delivery of housing on small sites in policy H2, but this policy raises a number of questions about how the policy can be effectively applied at the local level. This includes how infill development fits with no net loss of overall greenspace, the need to protect green infrastructure such as garden land and amenity space and the aspirations to create a National Park City. We feel that policy H2 should remove the presumption in favour on garden and amenity land. Lewisham have, for a number of years, been successfully implementing policy DM33 from our Development Management Local Plan which resists development on garden land and amenity areas and in turn seeks to protect local character. This has been implemented whilst we have at the same time been largely exceeding our house building targets and we wish to continue to be able to support new development but not at the expense of local amenity.

The Council sees that the potential piecemeal demolition and redevelopment of existing buildings could have the potential to significantly and harmfully impact on the character of places and that the character of some areas means that great levels of change cannot be accommodated over time. This is particularly true for Conservation Areas. Whilst the methodology has applied a reduced rate of development coming forward in Conservation Areas and that policy H2 mentions a presumption in favour of small housing development unless it will give rise to an unacceptable level of harm to designated heritage assets, we feel policy H2 should go further by removing the presumption in favour in Conservation Areas.

Other considerations include the potential impact on Local Authority resources from a rise in small site applications and the need to prepare Design Codes; the potential increase in house conversions which will likely result in the loss of family accommodation (contrary to Lewisham's current policy which restricts conversions in recognition of the number of small

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units delivered in new builds); the potential difficulty to refuse inappropriate infill development due to the presumption in favour of small housing development (especially in the absence of Design Codes, and the limited criteria upon which to base this decision); the potential ad-hoc small scale residential development that may increase the population of local areas without the provision of the necessary infrastructure and services to accompany it.

The Council is broadly supportive of the principle of Good Growth and acknowledges the reasoning behind the move to more challenging housing targets in policy H3. However, it should be recognised that the proposed target for Lewisham of 2,117 units per annum (of which 829 relates to small sites) does go well beyond what we have traditionally been able to achieve in the past. There is concern that quality could potentially be sacrificed in favour of high housing numbers and density and this needs to be more tightly controlled.

Like many other London boroughs, Lewisham is concerned with the proposed small sites target (in Table 4.1/Policy H2) and their contribution towards the overall housing target in the Plan. While the Council recognises that the presumption in favour of small sites development could lead to a positive effect on the number of smaller developments coming forward in the borough, it is uncertain that the small sites target proposed is realistic within the Plan period, given that it is a new, untested methodology. It should be noted that Lewisham's historic windfall/small sites delivery rates are significantly below what is being proposed through the Plan. It is also unclear what the consequences could be for London boroughs if the annual housing target is not met.

Lewisham is generally supportive of affordable housing policies H5-H8 and welcome the aspiration to increase affordable housing delivery across London. It reflects our own ambitious programme of securing affordable housing and our commitment to deliver 500 new Council homes by the end of 2018. Policy H7 is welcomed, including the promotion of Build to Rent and the encouragement of smaller enterprises seeking to maximise on-site affordable housing, particularly on small sites. It is however recognised that GLA grants and other funding sources for affordable housing will be essential if the 50% aspirational target in policy H5 is to be met. Without this level of support, there is potential for schemes which may generate a range of wider regenerative benefits to become unviable. This aspirational target may also be difficult to achieve on public sector land where there is often a need to re-provide a range of other infrastructure and services, often at significant cost to the overall development and viability. This may include on key town centre sites where proposals are looking to enhance the retail, civic, employment and leisure function of the town centre whilst providing an environmental uplift and affordable homes, such as Catford town centre. We also urge caution with the Fastrack route applied in policy H6 and suggest that Local Authorities should be able to negotiate affordable housing that is tailored to both strategic and local circumstances.

The Council has a strong history of housing delivery and policy, with a clear plan-led approach to housing. Policy H12 raises a number of questions around the implication that two-bed units are suitable for family accommodation, which appears to conflict with our local understanding whereby family occupation of such smaller units is through necessity, not choice. The Council would caution against an approach that may restrict the supply of three-bed units which would likely accentuate the lack of affordability in this sub-market, and compound issues around overcrowding and associated wellbeing. Opportunities should be explored to provide more assurances around the provision of larger affordable housing units, in order to stimulate a more appropriate mix on-site.

The recognition of quality concerns over some HMOs are welcome and this reflects local experience. It is also considered that there are wider issues around HMOs and how these are being used to house some of the most vulnerable residents in Boroughs that goes beyond planning and the Council would encourage the Mayor to review this issue and provide strategic support.

Chapter 5 Social Infrastructure

Lewisham is generally supportive of policies S1-S5 and S7 and welcomes an emphasis on high quality social, health, educational and recreational facilities. The Council is pleased to see that these policies reflect work already being planned and undertaken within Lewisham, especially in terms of the Catford town centre regeneration scheme, the Health Devolution pilot scheme, One Public Estate initiative, whole system obesity scheme, Air Quality Action Plans, the Cycling Strategy and our work with education providers such as Goldsmiths.

The highly ambitious aspirations around Good Growth, whereby new homes are accompanied by high quality infrastructure and services may result in a degree of tension arising between policy aspirations, and it is recognised that negotiations will likely occur around key strategic priorities where competing needs arise. The Council will need to be leading this debate at the local level to reflect both strategic and local priorities in Lewisham.

Whilst we welcome policy S3 and the need to provide educational facilities to meet demand, some educational facilities are no longer in our control and we seek further guidance and support from the GLA to help deliver policy S3 at the local level.

The Council recognises that a collaborative approach will be essential in working across London and between Local Authorities to deliver infrastructure that covers a wider than local level, such as many leisure facilities, for example 50 metre swimming pools.

A key issue that the Plan highlights is that the funding availability will be crucial to the delivery of social infrastructure, in a context of constrained Local Authority resources. Further work is likely to be necessary around the housing and infrastructure aspiration in the context of providing a suitable funding package if infrastructure services and facilities are to be delivered under a banner of Good Growth.

Chapter 6 Economy

Lewisham is generally supportive of the economy policies E1-E11, including: the future potential change of Lewisham to Metropolitan status; the promotion of low cost business space and affordable space, the identified sector growth opportunities and having differing retail roles within different types of centre.

London has the highest levels of childhood obesity in England and restrictions on A5 hot food take-aways can do much to support reducing obesity levels and inequalities. Lewisham is taking a whole system approach to tackling obesity and adopted the same type of policy as E9 in 2014, which has allowed applications to be refused and there has been a significant reduction in the number of applications submitted.

As a Borough Lewisham are seeking to grow the local economy and increase demand for business/office space. The economy policies should recognise those future aspirations and not limit the ability of Local Authorities to secure suitable office accommodation based on current demands.

We note that Table 6.2 identifies Lewisham as retaining industrial capacity, however the Council believes that through the plan-led process alongside careful development management, that Lewisham has the ability to consolidate and intensify industrial land to enable the introduction of mixed use development. The Council acknowledges the rationale behind the strategic principles of policy E7, and already have examples of successful intensification, however a number of questions are raised around the practicalities associated with this policy that may require further consideration.

The Council would like to see the Plan (policy E11) consider more explicitly how development can support London based SMEs and the contribution made to employment, apprenticeships, and London Living Wage as part of the aspirations for Good Growth, however questions are raised around the prescriptive accessibility policies contained in policy E10.

Chapter 7 Heritage and Culture

Lewisham is broadly supportive of heritage policies HC1-HC4, especially the use of Heritage Strategies and the London View Management Framework. It is however recognised that the proposed policies are significantly more onerous and will have substantial resource implications on Local Authorities in relation to: ensuring assessments of Heritage Assets are done in advance of development proposals coming forward; implementing a tiered classification system for Archaeological Priority Areas; action around World Heritage Site Steering Groups and preparing Heritage Impact Assessments where development could harm World Heritage Sites; and, in identifying local views.

We are broadly supportive of cultural policies HC5-HC7, provided a balance can be found which does not lead to adverse impacts on town centres and people's health and wellbeing. The protection given to public houses is welcomed and reflects the strong approach that we are already taking in Lewisham.

Chapter 8 Green Infrastructure and Natural Environment

Lewisham is generally supportive of green infrastructure policies G1 and G3-G9, including the protection and enhanced importance given to green infrastructure, Metropolitan Open Land, local green and open spaces, biodiversity, trees and woodland, food growing and geodiversity and in particular the provision of street trees that are appropriate to their locality.

The Council acknowledges the protection given to London's Green Belt in policy G2 and feels that this will place additional burdens on inner London boroughs to accommodate the level of housing to meet London's need. We therefore promote a more balanced approach which also relies on releasing parts of London's Green Belt in a strategic and planned manner.

It is recognised that these policies will need to be applied with a degree of flexibility, to reflect local circumstances and strategic and local priorities. This could include circumstances where minimal losses of green space are necessary to deliver strategic proposals that will provide a wide range of regenerative benefits, such as in strategic town centre regeneration and critical infrastructure projects, such as Catford town centre.

We see the Urban Greening Factor as a useful tool that will enhance green infrastructure on a site by site basis, although further guidance will be necessary on how Local Authorities should implement this policy at the local level. A number of questions are outlined in Appendix 1 around the implementation of these policies.

Chapter 9 Sustainable Infrastructure

As a general point, effective adaptation and mitigation of climate change depends on policies across multiple scales including within the London Plan. The Plan should include the regional adoption of a Representative Concentration Pathway (RCP) scenario. This would support London boroughs to adequately assess the risk and implement local planning conditions for development which would adequately address risks identified in the UK Climate Change Risk Assessment, and the pending UK Climate Projections (UKCP18). This applies not just to greenhouse gas emissions but also to a number of other strands, particularly green and blue infrastructure and waste.

Lewisham is generally supportive of policies SI1 – SI17, however questions are raised around the implementation of these, and the resource implication on Local Authorities. The policies will likely require greater working with Environmental Health in a context of constrained Local Authority finances, and a number of these policies would also involve new technical assessments including Energy Masterplans. Opportunities would be welcomed for the Mayor to explore the provision of specialised support in this area through a centralised advisory/consultee resource where Local Authorities do not have the capacity.

In terms of policy SI3, we have some experience of decentralised energy networks and also have ambitious plans to connect development sites in the north of the Borough to SELCHP where we welcome the GLAs strategic support. Monitoring and reporting on energy performance for major developments in SI2 will help address the problems of predicted and actual performance that have affected some communal systems. Overheating, high energy bills for tenants and the ability to deliver stated carbon savings are particular issues that need to be rectified, as evidenced in our Housing Select Committee's scrutiny report on communal heating:
http://councilmeetings.lewisham.gov.uk/documents/s37476/Communal%20Heating%20Report.pdf
and the response to Mayor and Cabinet on its recommendations:
http://councilmeetings.lewisham.gov.uk/documents/s38782/Response%20to%20SDSC%20Communal%20Heating%20Review.pdf
Policy SI3 should also be strengthened by emphasising that communal systems are designed, built and maintained to the highest industry standards (such as through the CIBSE Code of Practice for Heat Networks) and are planned in an integrated way to supply as diverse a profile of demand as possible. This would accord with our ambitions to maximise the energy generated from SELCHP and facilitate wider decentralised energy schemes in the north of the borough.

Concerns also exist around the introduction of the air quality offset fund in policy SI1 and enforcing Circular Economy Statements in policy SI7.

We note paragraph 9.9.2, which suggests waste site release should be part of a plan-led process. This is already taking place; as we work with other Local Authorities as part of the South East London joint waste planning group to pool our waste apportionment requirements and identify sufficient capacity at safeguarded waste facilities across south east London to meet these requirements.

New mooring facilities covered in policy SI16 may not always be possible and could jeopardise the development of riverside sites where wider regenerative benefits are already planned.

Chapter 10 Transport

Lewisham is generally supportive of transport policies T1-T9, especially in mitigating transport impacts, enhancing cycling, and higher minimum cycle parking standards. We are particularly encouraged by the Healthy Streets Approach and recognise that the joint project between TfL and Lewisham to re-route the A205 road through Catford town centre will significantly contribute to the delivery of the Healthy Streets agenda in our borough. As such, the Council would request that this scheme is added to Table 10.1.

The Council has a number of concerns including our ability to meet the challenging target in policy T1 of 80% of journeys made by sustainable means, and further commitments by the Mayor and others to a range of borough wide projects and significant investment in public transport will be required to achieve this level of modal shift.

Questions are raised over policy T3 and how to deal with the situation where an increase in transport capacity is needed to support a development but where no firm plans and funding exist to deliver transport schemes. We would also emphasise that policy T9 should acknowledge the need to utilise MCIL and MCIL2 to fund BLE, and that funding from Central Government, or other methods such as land value capture and upfront private investment will also be needed.

It is felt that policy T4 may be overly prescriptive in requiring Transport Assessments for all applications. Furthermore, while policy T6 promotes car free developments within London, it is recognised that there are limited opportunities to create car free developments in Lewisham until strategic and local public transport improvements are made, and further CPZs are implemented.

Chapter 11 Funding the London Plan

Lewisham is generally supportive of the policies related to infrastructure, and we welcome the continued commitment to infrastructure delivery along with the delivery of the BLE. However, we feel that to achieve the ambitions of Good Growth both Phase 1 and Phase 2 of the BLE will need to be delivered, and further commitments to this would strengthen the Plan's approach to infrastructure. This would need to include a comprehensive review of the use of Mayoral CIL funds, as well other funding options. Further details and support from the Mayor and Central Government over the resource implications of the Plan will be needed, to ensure the Plan is deliverable and can be found sound.

Whilst a better alignment of housing growth and infrastructure within the Plan is generally supported, concerns exist around policy DF1 and the inherent tensions that are likely to arise when prioritising planning obligations for infrastructure and affordable housing. The Council would prefer to see the NPPF emphasis retained, whereby these decisions are made by the Local Authority having considered both strategic and local priorities. This would have implications on key town centre mixed-use scheme in the borough (such as Catford) where a mixed focus on the provision of jobs, economy, retail, leisure, civic, culture and community needs to be balanced against other demands such as affordable housing.

In this regard Local Authorities should retain the ability to both negotiate planning obligations and apply discretion to funding, so that it is tailored to both strategic and local circumstances.

Chapter 12 Monitoring

Lewisham is broadly supportive of the policies on monitoring and recognises the benefits in monitoring. Questions are raised however around the resource implications of these monitoring commitments on Local Authorities.

Further Comments

For ease of reference, the strategic comments made within the letter above have been repeated and expanded upon in the attached schedule of comments (Appendix 1). These have been logged against the individual policies, paragraphs and figures of the Plan.

It is evident from Appendix 1 that a number of recurring concerns have been raised. These are summarised below:
- Many policies require a considerable amount of additional work to be carried out by Local Authorities, which will have significant resource implications in the context of continued fiscal austerity. Many of the policies will exert more pressure on already stretched budgets and staff resources and further consideration may be necessary on this issue.

- Many policies require the submission of a range of information and/or technical assessments alongside planning applications. This has the potential to inadvertently lead to a more protracted pre-application and planning application process, which additionally burdens both the Council and applicants, and which could compromise the delivery of high quality development in a timely manner.
- Many policies have moved beyond strategic issues and provide considerable levels of detail; this could inadvertently lead to more standardised types of development regardless of the local context, and a number of policies stray beyond the remit of planning and seek to influence matters normally considered as part of the Building Control process.
- Many policies will require additional detail within the policy and/or further guidance if they are to be effectively implemented and managed by Local Authorities.
- A number of policies appear to prioritise the delivery of affordable housing over other considerations, which has the potential to undermine the aspirations for Good Growth and to erode local democratic processes.
- A number of policies would benefit from a greater commitment in terms of how the policy will be implemented and how development and infrastructure will be funded, such as those around the BLE.
- Comments have not been provided where a policy has a limited relevance to the borough (such as in other OAs), or where the Council has no initial comment at this stage.

Once again, we are encouraged by the comprehensive and ambitious approach provided by the policies in the Plan and how they align with the work we are already doing here in Lewisham, and we welcome the opportunity to work with the Mayor in the future to further realise these aspirations.

Yours sincerely
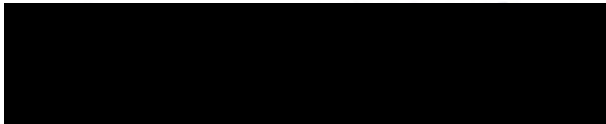
Sir Steve Bullock
Mayor of Lewisham

Appendix 1: Schedule of comments from the London Borough of Lewisham

Plan Reference	Comments
Chapter 1 Planning London's Future (Good Growth Policies)	
General comment (page 13)	The Good Growth principles, detailed in policies GG1 – GG6, form the central core of the Plan around which the rest of the policies are based. These policies are supportive of our aspirations for key regeneration proposals such as Catford town centre and the Bakerloo Line Extension, and builds on the work already planned and undertaken in the borough which aligns to these key principles. These themes could be incorporated in to the Local Assembly process but would require resourcing in a similar manner to the Portas pilots.
GG1 Building Strong and inclusive communities (page 13)	GG1 introduces new concepts such as a more equal city, social isolation, face-to-face contact and adaptability to changing community requirements. We strongly support building strong and inclusive communities, reducing social isolation and improving mental health, good affordable housing and connectedness in communities as they reflect our current approach which seeks to secure active uses in town centres and develop thriving communities. We acknowledge that London Boroughs will need a clearly articulated approach to address social isolation and promote inclusivity and further guidance on this would be welcome. Further consideration should also be given to: • How high quality design can encourage the opportunity to dwell and interact (stairwells, common areas and amenity areas). • Emphasizing the importance of affordable housing in building inclusive communities, as the SHMA identified 47% of all homes should be low cost rented. • How alterations, extensions and conversions to flats can build in adaptability, for instance, through design of internal circulation and retention of access to rear gardens.
Paragraph 1.2.6 (page 15)	We endorse the London Mayors efforts to make London a greener city and welcome the concept of a National Park City and the target of 50% green cover. Questions are raised around the difficulty in achieving this in major urban centres, and where development patterns are set. Further questions are raised around the likely degree of tension that may arise between policy aspirations within the Good Growth agenda, and negotiations will likely occur around key strategic priorities where competing needs arise. The Council will need to be leading this debate at the local level to reflect both strategic and local priorities in Lewisham. Further consideration should also be given to: • How green cover will be judged, as increasing tree canopy cover may not be the best indicator for this. • The principle of right tree, right location as large canopy trees can cause structure damage to buildings and underground services and smaller species may be more suited to the local character and will have the net effect of lowering maintenance liability, especially for private landowners. • The need for healthy and sustainable tree root development within developments and in growth areas.
GG2 Making the best use of land (page 15)	GG2 introduces new concepts such as prioritising sites within town centres or 'small sites', promoting higher density development, multi-functional infrastructure and a target of 80% using sustainable transport. We support making the best use of land and acknowledge that GG2 seeks to balance more development with protecting good quality green spaces. GG2 builds on the work already ongoing between public sector partners regarding better use of assets, including co-location of staff to release buildings for alternative uses such as housing.

	However, understanding what is valued about existing places and using it to act as a catalyst implies that growth will/should be realised differently in different places. This will have considerable impact on resources as London Boroughs will need to create more in-depth character studies, SPDs and development briefs and a more pro-active approach towards infrastructure assets. Pressure will also be placed on London Boroughs to determine a significant increase in small sites applications and to defend unsympathetic development of poor quality including on garden land. A rush of development will also have an effect on the environment through the use of finite resources, movement of materials and the short life-cycle of existing development being demolished to make way for additional housing. Further consideration should also be given to: • The need for flexibility to protect and enhance the local character of the area and respond to social, environmental and economic needs within the borough. • How and who will measure the target of 80% journeys using sustainable transport. • Retaining and protecting front gardens as they have importance for biodiversity, contribute to local character and create a healthy place to live, it is people's most immediate access to green space and an important network between parks and open spaces. • How small sites development will affect Conservation Areas, heritage assets and the suburban character of parts of the borough. • How public sector land can provide for new service facilities, not just homes and workspace.
GG3 Creating a healthy city (page 17)	GG3 introduces new concepts such as mental health, Healthy Streets and a healthy food environment. We strongly support the need to create a healthy city, especially the emphasis on health, HIAs, access to green space and facilitating active travel, especially where population and density of development are increasing. GG2 reflects our current practices that seek to take a whole systems approach to improving mental and physical health, reduces health inequalities and creates healthier environments making it easier for residents to choose healthier diets and active lifestyles. GG3 is supportive of our borough-wide 20mph speed limit and the joint project with TfL to re-route the A205 through Catford town centre, as part of the Healthy Streets Approach. We would welcome additional guidance on the effective implementation of GG3 and how creative design of development and mitigation measures can help mental health and lead to a healthy city; and ensure consistency of approach across all London Boroughs. Further consideration should also be given to: • Strengthening the policy to ensure HIAs are actioned, not just prepared. • The need for health infrastructure to meet an expanding population.
GG4 Delivering the homes Londoners need (page 19)	GG4 introduces new concepts such as 50% of homes being genuinely affordable, developing small sites and increasing build out rates. Whilst we generally support GG4, we have concerns over the target of 50% affordable housing, particularly on public sector land where there may be service facilities and other social infrastructure to re-provide at often significant costs. This aspirational target may also be particularly difficult to achieve on public sector land where there is often a need to re-provide a range of other infrastructure and services, often at significant cost to the overall development and viability. This may include on key town centre sites where proposals are looking to enhance the retail, civic, employment and leisure function of the town centre whilst providing an environmental uplift and affordable homes. Further consideration should also be given to: • Including stronger wording relating to the provision of affordable housing. Affordable housing needs to be affordable not just in capital expenditure but also in operational efficiency. • Equitable access to affordable transport routes, social infrastructure, access to green infrastructure and flood protection. • Ensuring precision manufacturing and faster building rates respond to local character and help create a new local vernacular.

	• Ensuring the quality of schemes that come forward from small operators and ensuring schemes are design, not delivery, led. • How build out rates can be incentivised when currently these are demand/market led. • How additional development will affect our heritage and sense of place/character and identity of places. • The additional monitoring required to implement this policy.
GG5 Growing a good economy (page 21)	GG5 introduces new concepts such as the potential of wider city region and agglomeration. We especially support the promotion of heritage and cultural assets and the 24 hour city. GG5 allows for interpretation/ tailoring to specific borough requirements by strongly focussing on local identity of places, although some would be of more inherent interest than others. Further consideration should also be given to: • How public transport contributing to agglomeration can be measured. • How the borough's economy contributes to the wider city region and how this can be measured. • Build out rates can be incentivised when currently these are demand/market led. • How heritage assets on a local list can play an important role in heritage-led development.
GG6 Increasing efficiency and resilience (page 23)	GG5 introduces new concepts such as a zero carbon city by 2050 and taking an integrated approach to the delivery of strategic and local infrastructure. Overall we welcome increasing the resilience and efficiency of planning and development. Questions have been raised that London Borough's will need specialist staff to ensure delivery of sustainable methods and materials. Further guidance would be welcomed to understand what is involved in the transition to a circular economy, the use of adaptive infrastructure, the roles and responsibilities of different parties and to how respond to the impacts of climate change. Further consideration should also be given to: • Including reference to how landscaping is designed to adopt to climate change.

Plan Reference	Comments
Chapter 2 Spatial Development Patterns	
SD1 Opportunity Areas (page 28)	We are generally supportive of SD1 as it seeks to bring together the range of investment and intervention necessary to fund the infrastructure that underpins the Good Growth ambitions of the Plan. SD1 is generally supportive of the Council's aspirations for Catford town centre. Questions have been raised that need to consider the resource implications of this, including capital funding and Local Government resources, and for the GLA and Central Government to provide sufficient support to London Boroughs in this regard.
Paragraphs 2.1.12 and 2.1.3 - Bakerloo Line Extension (page 33)	We strongly support the commitment given to the Bakerloo Line Extension (BLE) and the recognition that investment in this strategic piece of transport infrastructure, to serve Old Kent Road, New Cross Gate and Lewisham, will improve connectivity, increase the capacity and resilience of the transport network and reduce journey times. It is particularly encouraging to see references to how the BLE will unlock development opportunities to help London to grow by supporting new jobs and homes in these locations. We strongly feel that the Plan could go further by providing a commitment to how this essential piece of infrastructure will be funded, and providing a commitment to both Phase 1 and Phase 2 in this regard. If the Good Growth ambitions and 80% of journeys by sustainable transport are to be achieved, the Plan should also set out a commitment to Phase 2 of the BLE, extending from Lewisham, through Catford and beyond. Furthermore, its delivery should be secured, with a commitment to utilise Mayoral CIL funds including MCIL2 and other potential sources of funding. This will help to enhance PTAL levels which in turn will increase the share of journeys made by foot, cycle or public transport and provide opportunities to unlock

	development, particularly in the south of the borough. Critically, Phase 2 of the BLE will reduce the strain on existing rail services, future proof the station interchange and encourage growth by helping to deliver approximately 2,700 new homes within Catford town centre. Further consideration should also be given to: • The need to safeguard the future route alignment of the BLE and adequately protect key sites from development that does not maximise the benefits to be received from the delivery of the BLE. • Linking the implementation of permissions to the provision of necessary infrastructure, to ensure timely delivery of both or in some instances allowing sites to be brought forward in advance of the BLE where financial contributions will result in other transport infrastructure improvements, e.g. lengthening of the DLR rolling stock. • The mid and long-term implications on the depot site on Wearside Road, currently proposed for a ventilation shaft and work site for BLE. Work is currently ongoing as part of the consultation process with TfL to understand the full implications of re-locating the Council's services from this site and it's longer term potential for mixed use development.
Paragraphs 2.1.16 to 2.1.18 – Opportunity Areas (page 35)	We support the retention of the two Opportunity Areas within the London Borough of Lewisham, namely New Cross/Lewisham/Catford OA and Deptford Creek/Greenwich Riverside OA. These designations reflect the Councils aspirations for developing these areas and would continue to provide strategic support to the work being planned and undertaken within these areas. The Council has a number of clear aspirations within these OAs, and would support a clearer and more precise approach to key strategic issues including infrastructure, such as the BLE and the realignment of the A205 road through Catford town centre. We are actively looking at key redevelopment and regeneration sites to provide for new homes of varying tenures as well as better quality and more varied provision of commercial and employment space. We are also working with key partners including Goldsmiths to help achieve their objectives for their own land, continually reviewing our own assets and leading on masterplans to reinvigorate our town centres with a focus on civic, cultural, retail and leisure facilities. It is particularly encouraging to see reference to: • Significant opportunities for redevelopment around New Cross Gate station, which will help to support commercial expansion and diversification whilst building on existing assets and increase connectivity to surrounding communities. • the continued transformation of Lewisham into a high performing and vibrant retail hub, with the potential to become a town centre of Metropolitan importance and the potential for further growth at Lewisham supported by enhanced access that will result from the arrival of the BLE at Lewisham Interchange. • The transformation of Catford town centre through significant urban renewal, which will restore the fractured town centre and re-invigorate it. • The potential routing of the BLE Phase 2 through Catford that can unlock further development potential within the town centre and beyond. Further consideration should also be given to: • Amending paragraph 2.1.16 to "~~emerging~~ *existing* artistic and cultural character". • Amending paragraph 2.1.16 to "the proposal for ~~an extension of the~~ *a* Bakerloo Line *Extension station* at New Cross Gate". • Amending paragraph 2.1.16 to "Development should improve north-south connections and pedestrian and cycling movement across *and along* the traffic dominated New Cross Road (A2) as well as connectivity between New Cross Gate and surrounding communities". • Amending paragraph 2.1.18 to include "The realignment of the A205 road will assist in the transformation of the town centre", as this piece of infrastructure has now received £10m in HIF.
Thames Estuary North and South (page 43)	Further consideration should be given including potential ferry links between Deptford and the Isle of Dogs.

SD2 Collaboration in the wider South East (page 57)	No comment.
SD3 Growth locations in the wider South East and beyond (page 61)	No comment.
SD4 The CAZ (Central Activities Zone) (page 66)	No comment.
SD5 Offices, other strategic functions and residential development in the CAZ (page 75)	No comment.
SD6 Town centres (page 78)	We support SD6 as it is aligned with our aspirations for intensifying Lewisham and regenerating Catford town centre via mixed-use developments. We are pleased that SD6 acknowledges town centres as a good location for older person's housing as well as student accommodation. We are keen to maintain vitality in our town centres and believe that by adding a well-planned residential element can stimulate vitality and vibrancy whilst helping to foster an inclusive night-time economy that will ensure our Borough does not become a dormitory suburb of central London.
SD7 Town centre network and Annex 1 (page 81)	We fully support the future potential change of Lewisham to Metropolitan status in Figure A1.1. Further consideration should also be given to: • Changing Figure A1.1 to reclassify New Cross/New Cross Gate as a Major town centre given the intensified transportation links associated with the BLE and the development opportunities that this will bring to the area.
SD8 Town centres: development principles and Development Plan Documents (page 86)	We support SD8, especially in terms of fit out where we have some difficulty with developer push back. We will be reconsidering some of our town centre boundaries in our next Local Plan, in order to reflect changes in local character, current plans for development and development opportunities arising from Phase 2 of the BLE. Further consideration should also be given to: • Amending SD8 to ensure that ~~commercial~~ *all* floorspace relates to the size and role and function of a town centre. • Allowing more flexibility in retail floorspace, in line with the role and function of each centre.
SD9 Town centres: Local partnerships and	We support policy SD9 which is aligned with work planned or already underway at Lewisham. We are continuously reviewing Council assets for opportunities for more comprehensive development opportunities offering a range of uses and housing tenures. We have and will continue to support land assembly where appropriate through use of CPO powers.

Plan Reference	Comments
implementation (page 90)	
SD10 Strategic and local regeneration (page 92)	We support SD10 as it seeks to tackle deprivation through local regeneration schemes. We are continuously reviewing the borough and key opportunity areas for regeneration, beyond just housing and SD10 is well aligned with our aspirations for Catford town centre.

We recognise that the long-term success of SD10 will be dependent upon major infrastructure investment such as BLE helping to unlock regeneration opportunities to their greatest potential. |

Plan Reference	Comments
	Chapter 3 Design
D1 London's form and characteristics (page 98)	D1 introduces new concepts such as optimising density, encouraging comfortable and inviting environments and positive reciprocal relationships between inside and outside to generate liveliness and interest, facilitating efficient servicing/maintenance of buildings and the public realm, and minimising the impact of deliveries. We already aim to achieve these principles.

Questions have been raised around policy D1 which could lead to the need for London Boroughs to prepare design SPDs. |
| **D2 Delivering good design** (page 102) | Overall, we support D2, as we already implement/strive towards this approach for major developments and have an established Design Review Panel.

Questions have been raised around policy D2 and the level of detail covered which would be better determined at the local level. This could lead to a more protracted planning application process due to:
• Applicants having to provide additional information that is not currently requested, making it harder for them to submit an application
• Development Management Officers having to take additional factors that were not previously considered into account.

Furthermore, the additional resource implications arising from D2 are significant, as there will be a need to prepare a range of documents to sit beneath Local Plans in order to secure good growth that is appropriate for the local area in an era without the density matrix. Additional work could include:
• Design codes that can be time consuming to prepare. Even developing simple rules for small sites in line with the presumption in favour of development will take time and could stifle good, innovative design.
• A series of area visions/strategies, focussing on areas with greatest potential for change/development pressure.
• Utilising 3d modelling which requires technical expertise and appropriate hardware.
• Studies that assess the significance and contribution to local character.
• Conservation Area Appraisals.
• Assessing construction details.

Further consideration should also be given to:
• Whether architect retention clauses work in practice and goes against the ability to allow for competition. Instead we should condition the details and secure as much as possible in the planning permission.
• The additional work this will generate for small applications.
• How outline permissions or PIPs fit into D2 where the details of the scheme will be determined at reserved matters or technical details consent stage.
• How conditions can prescribe quality levels.
• The implications for areas to be identified for not having capacity / or very low capacity? If so how does this work with small sites |

	projected numbers? • Applying a threshold to exclude small schemes.
D3 Inclusive design (page 106)	D3 introduces new concepts such as providing independent access without additional undue effort, separation or special treatment. This seems to imply lifts or ramps that provide step-free access without integrating properly with architectural or landscape design can be resisted. Further consideration should also be given to: • Whether D3 is reasonable in all instances, e.g. a first floor flat conversion accessed by stairs. • Whether a threshold should be applied to the scale or type of development. • The ability to refuse development where the step free access is not integrated into the building and landscape design.
D4 Housing quality and standards (page 109)	We welcome the Mayor's position on improving residential standards in D4, and that specific cases need to be made for deviation, e.g. conversion of listed buildings. We particularly support the reference to overheating. Further consideration should also be given to: • Whether it would be more appropriate to incorporate the standards in the Housing SPG, as opposed to D4. • Whether space for refuse and recycling should be addressed at the local level, to reflect London Borough's own collections. • How detailed does D4 need to be in terms of internal storage. • How Pocket Housing fits within the standard.
D5 Accessible housing (page 115)	No comment.
D6 Optimising housing density (page 117)	We acknowledge that the density matrix has been removed from the Plan, and we approve of a more place specific, design-centric approach, provided that applicants are required to give consideration for transport capacity and local evidence such as character studies can be used to resist developments that are not in keeping with the local character or do not create high quality places. The removal of the density matrix may unintentionally raise developer and landowner expectations around the appropriate scale of developments. Further clarification around the design-led approach to optimising housing density should recognise that whilst tall buildings have a place in parts of London, it is the quality of placemaking that is key. The Council has consistently delivered high quality design-led development within the borough and we welcome the continued emphasis on design as a key consideration in the capital, whereby Local Authorities including Lewisham continue to be design advocates. Whilst the principles embodied in the D6 are broadly supported, a degree of concern exists around the implementation of these, and the likely Local Authority resourcing implications of these proposed policies particularly where detailed policy requirements have been introduced. Further consideration may need to be given to how these detailed policies could inadvertently lead to a more protracted pre-application and planning application process, which additionally burdens both the Council and applicants, and which could compromise the delivery of high quality development in a timely manner. D6 would place a significant burden on consultees if there are no thresholds in terms of size and type of application. Further consideration should also be given to: • London Boroughs setting their own Floor Area Ratio. • How to secure active travel.

	• What happens if infrastructure improvements are not delivered once schemes have been permitted? • How developments can be phased in line with transport capacity. Does this include transport schemes that are planned but not funded? Is it reasonable to prevent the development of part of a large site or occupation of a building and will this adversely impact a scheme's viability? Is modular construction that can be added to as transport capacity increases a solution? Can improvements be made to alternative forms of transport in the meantime to allow development to come forward? • What a management plan would do. • Ensuring that competing objectives can be simultaneously be achieved, e.g. promoting high density and optimising town centre land whilst at the same time not contributing to urban heat island effect and ensuring healthy streets/public spaces are provided. • The need for a degree of consistency, with the GLA providing subjective representations on major schemes.
D7 Public realm (page 122)	We support D7 as it gives public realm the status it deserves. However, it is prescriptive and could lead to a more protracted planning application process (as D2 above). Further consideration should also be given to: • Amending D7 to acknowledge that not all development proposals affect public realm. • How free drinking water will be funded and managed.
D8 Tall buildings (page 126)	We support elements of D8, in particular the introduction of standard requirements whilst being able to define what is considered a tall building based on local context. We do consider that existing context needs to be considered in OAs as well as the emerging context. Further clarification around the design-led approach to tall buildings should recognise that whilst tall buildings have a place in parts of London, it is the quality of placemaking that is key. Questions have been raised around the quantity of detail in policy D8, and the resource implications of this in terms of the amount of assessment that will be required. This could lead to a more protracted planning application process (as D2 & D6 above). Resource intensive character studies will need to make recommendations on area suitability for tall buildings, appropriate forms and typologies. Further consideration should also be given to: • How public access and rooftop access can be accommodated in more prominent buildings. • How can tall buildings make a positive contribution in terms of proportions where the surrounding context is low rise, as is the case in Catford? • Whether TfL will advise on suitable locations for tall buildings where the transport network is capable of accommodating the quantum of development.
D9 Basement development (page 131)	Policy D9 lacks clarity and questions have been raised around it not being strategic matter that needs to be included in the Plan, whereby these local issues should be dealt with by the Local Authority plan making processes and through development management.
D10 Safety, security and resilience to emergency (page 132)	Questions have been raised that D10 is too detailed and will be too onerous if it is applied to all development, as Secure by Design consultees struggle to provide comments even on a limited number of applications.
D11 Fire safety (page 134)	We recognise the importance of fire safety following the Grenfell fire. However, D11 strays into other legislative remits, namely the Building Control functions of the Council. Instead, we believe that there should be a focus on improving Building Regulations rather than seeking to expand powers to another regime.

	Furthermore, D11 requires a level of expertise that the borough does not currently hold. Requiring Fire Statements for all major development proposals will lead to: • Applicants having to provide third party technical reports that are time consuming and costly to prepare, making it harder for them to submit an application, • Development Management Officers not having sufficient knowledge to be able to competently assess technical documents prepared by specialist third parties, • The need for additional resources and training in order to implement this policy effectively. The GLA would need to provide further guidance on how to assess Fire Statements and to assess if a development is constructed in an appropriate way to minimise the risk of fire spread, provides appropriate access and firefighting equipment appropriate for the size and type of development. Further consideration should also be given to: • What extra funding will be provided to London boroughs and the Mayors LFEPA to achieve this? • Whether the London Fire Brigade is resourced to respond to planning applications in the required timelines and based on the level of detail submitted with a planning application.
D12 Agent of change (page 136)	We support the principle of Agent of Change in D12, as we already adopt this approach and use conditions to protect new developments from existing sources of noise. However, questions have been raised around the requirement at the design stage so that development should be refused if it cannot demonstrate that agent of change has been considered. Questions also exist about implementing D12 as noise control is dealt with by different legislative remit. Further consideration should be given to: • The role of Environmental Health. • Instances where it is not possible to separate new noise sensitive development. • How resource intensive it can be to implement and enforce conditions relating to noise. • How the design of the development is crucial in protecting against noise impacts. • The need for continued monitoring of new sensitive developments and existing noise generating activities. • How can you design noise generating uses which allows them to grow without restriction?
D13 Noise (page 139)	We generally support D13 as we are committed to increasing green space for air quality and noise purposes and have been working in Deptford to promote tranquillity. Further consideration should also be given to: • Amending D13 to "improving and enhancing the acoustic environment, *where necessary…*". • London Boroughs that cannot nominate Quiet Areas where they have no designated Local Green Space, as is the case for Lewisham. • The administration of the Quite Area required within the DEFRA guidance is onerous and not considered to be effective in use of resources.

Plan Reference	Comments
	Chapter 4 Housing
H1 Increasing housing supply (page 144)	Overall, we support the ambition given to planning for housing throughout the Plan. Lewisham has an excellent track record in delivering housing over and above its targets. We are proud to look at innovative and new ways of achieving this and we are pleased that the Plan matches our ambitions. We support the Mayor's delivery focussed approach of delivering housing in Opportunity Areas, optimising housing delivery in some of the high PTAL areas, close to rail stations and in town centres and accommodating higher-density residential and mixed-use development where there is planned future public transport capacity. This strengthens the case for the BLE and the delivery of new homes across a range of tenures along this corridor.
	We consider that PTAL is a simplistic measure of connectivity and accessibility. It may not always be appropriate to optimise the potential for housing delivery on sites with existing or planned public transport access levels (PTALs) of 3-6, without first taking a more sophisticated look at the accessibility and character of the area surrounding a site. Further consideration should be given to this point throughout the Plan and especially in policies H1 and H2.
	We feel that PIPs will likely not increase planning certainty. Most London Boroughs are not implementing PIPs and there is current limited evidence that this approach will work.
Table 4.1 - 10 year targets for net housing completions (2019/20 -2028/29) (page 146)	We can point to a positive track record of delivering homes over and above the London Plan target for a number of years. The new target for London as a whole is challenging and for Lewisham has increased by over 50% to 2,117 units per year. Recognition of this challenge needs more emphasis throughout the Plan and the resource implications of this, however we believe that it is a positive step towards addressing London's housing crisis.
	As a Borough there is concern that quality could potentially be sacrificed in favour of high housing numbers and density and this needs to be more tightly controlled.
SHLAA	We support the large sites target as we have worked together collaboratively to identify a supply of housing land, including new potential development sites. We acknowledge that the SHLAA has not included SIL sites in order to protect designated industrial land. Some SIL sites are likely to come forward with planning applications that will seek to consolidate and intensify capacity whilst introducing new mixed use residential development too.
H2 Small sites (page 152)	In general we support H2 and the concept of utilising land more efficiently, introducing more variety into the housing market and placing greater importance on the delivery high quality and sustainable housing, some of which could include development on smaller sites. H2 encourages London Boroughs to prepare Character Studies, simple area-wide rules within Design Codes and more granular, place specific Local Plans which will take time and staff resources to prepare. These will generate a need for additional training of Development Management Officers to be able to apply Design Codes and Local Plan policies to planning applications.
	We would welcome further details on the funding and support the GLA will provide to assist in the delivery of this policy.
	We have some significant questions with regard to the implementation of policy H2 including: • The potential impact on Local Authority resources from a rise in small site applications. • A presumption in favour of small site development which will make it more difficult to refuse applications, even if they are out of character with their surroundings as it will be difficult to demonstrate that the development would give rise to an unacceptable level of harm to residential privacy, designated heritage assets, biodiversity or a safeguarded land use that outweighs the benefits of additional housing provision. This is particularly important as a significant amount of our annual completions are from small sites. Context and housing standards need to be added as considerations, otherwise the limited criteria listed at present could result in poor quality accommodation and design e.g. single aspect units in order to avoid overlooking. Tests of impact on neighbouring amenity

should include impacts on privacy, as well as outlook, overbearing relationship and daylight.

- How does infill development fit with no net loss of overall greenspace, the need to protect green infrastructure such as garden land and amenity space and the aspirations to create a National Park City. We have, for a number of years, been successfully implementing policy DM33 from our Development Management Local Plan which resists development on garden land and amenity areas (such as those surrounding residential blocks that are targeted as underused sites) and in turn seeks to protect local character, whilst at the same time achieving our house building targets; and we feel policy H2 should go further by removing the presumption in favour on garden and amenity land.

- Not all areas can accommodate additional housing provision, nor does their character mean that great levels of change can be accommodated over time. This policy encourages significant interventions which may harmfully affect local character. Piecemeal demolition and redevelopment of existing building has the potential to significantly and harmfully impact on the character of places which are not protected by conservation area status. We note that whilst the methodology has applied a reduced rate of development coming forward in Conservation Areas and that policy H2 mentions a presumption in favour of small housing development unless it will give rise to an unacceptable level of harm to designated heritage assets, and we feel policy H2 should go further by removing the presumption in favour in Conservation Areas.

- Design codes are resource intensive to prepare and may take considerable time to be adopted by LAs. In the meantime, small scale developments will come forward in a piecemeal way and will be difficult to refuse. Conversely, design codes will provide a degree of certainty but may curtail the ability to deliver truly outstanding homes of exceptional quality.

- Granting PIPs are not necessarily the best approach to ensuring small sites are delivered.

- Favouring housing development through the conversion of existing houses will lead to a reduction in the number of family homes available in the borough and an increase in house conversions which will result in the loss of family accommodation, unless family housing is adequately protected in the Plan. This is directly contrary to Lewisham's current policy approach which restricts conversions in recognition of the number of small units delivered in new builds.

- Is 25 units is the correct threshold for small sites? There is a vast difference between a 25 unit scheme and a 1 house infill.

- If a number of 'small sites' come forward in the same area they can have a more significant cumulative impact in terms of infrastructure provision. Ad-hoc small scale residential development that may increase the population of local areas without the provision of the necessary services to accompany it. The potential impacts of this approach on the timing, scale and spatial dispersion of residential development need to be better understood in order to plan for infrastructure.

- How will supporting infrastructure be funded given the inherent difficulties in planning for the delivery of smaller sites. How can long term certainty be provided when planning for infrastructure?

- A reduced distance of 600m from a tube station, railway station or town centre should be considered instead of 800 metres.

| **H3 Monitoring housing targets** (page 159) | We support the concept of good growth and the need for challenging targets in policy H3.

It should be recognised however that the proposed target for Lewisham of 2,117 units per annum (of which 829 relates to small sites) does go well beyond what we have traditionally been able to achieve in the past. There is concern that quality could potentially be sacrificed in favour of high housing numbers and density and this needs to be more tightly controlled.

Like many other London boroughs, Lewisham is concerned with the proposed small sites target (in Table 4.1/Policy H2) and their contribution towards the overall housing target in the Plan. While the council recognise the presumption in favour of small site development could lead to a positive effect on the number of smaller developments coming forward in the borough, it is uncertain that the small sites target proposed is realistic within the plan period, given that it is a new, untested methodology. It should be noted that Lewisham's historic windfall/smaller sites delivery rates are significantly below what is being proposed through the Plan. It is also unclear what the consequences could be for London boroughs if the annual housing target is not met. |
| **H4 Meanwhile** | We support the concept of meanwhile uses in H4 and have been successful in developing a temporary scheme with modular |

use (page 160)	construction techniques at Place/Ladywell. Further consideration should also be given to: • That mechanisms will need to be in place to ensure that the land can be developed for the original planned use and within the required timescales.
H5 Delivering affordable housing (page 161)	As noted in our response to the consultation on the Housing Strategy, we are supportive of the Mayor's approach to his ambitious commitment to affordable housing. It reflects our own ambitious programme of securing affordable housing and our commitment to deliver 500 new Council homes by the end of 2018. It is however recognised that GLA grants and other funding sources for affordable housing will be essential if the 50% aspirational target in policy H5 is to be met. Without this level of support, there is potential for schemes which may generate a range of wider regenerative benefits to become unviable. This aspirational target may also be difficult to achieve on public sector land where there is often a need to re-provide a range of other infrastructure and services, often at significant cost to the overall development and viability. This may include on key town centre sites where proposals are looking to enhance the retail, civic, employment and leisure function of the town centre whilst providing an environmental uplift and affordable homes, such as Catford town centre. Further consideration should also be given to: • How faster build times can be implemented given that it is out of the Council's control. For grant funding programmes, partial funds can be released when construction contracts are in place, with the remainder received if the scheme is completed on time.
H6 Threshold approach to applications (page 164)	Whilst there is some clear merit in the Fast Track route, we urge caution and suggest that Local Authorities should be able to negotiate affordable housing that is tailored to both strategic and local circumstances.
H7 Affordable housing tenure (page 169)	We welcome the focus placed on delivering genuinely affordable, social rented homes for our residents who are in the greatest housing need. We approve of the Mayor's commitment to targeting a whole range of Londoners in need of better housing. 70% of our residents rent privately and 90% of our private landlords own only 1 or 2 properties. This has led to more sub-standard accommodation and less security of tenure for residents. We are actively working to provide better value for our private renters and we believe London Living Rent can achieve that. Excluding Social Rent, it is the only product in the market that Lewisham residents earning a median income can afford. We are also working closely with a number of smaller house builders, RPs and land trusts to consider how we can build affordable homes in a more innovative way and likewise we feel that H7 should encourage smaller enterprises seeking to maximise on site affordable housing, particularly on small sites.
H8 Monitoring of affordable housing (page 173)	We acknowledge the additional resources that will be required in London Boroughs in order to monitor affordable housing in line with H8.
H9 Vacant building credit (page 174)	No comment.
H10 Redevelopment of existing housing and	Whilst we support the principle of no net loss of affordable housing and re-providing at existing or higher densities H10 is an overly detailed policy that does not take account of local circumstances. Further consideration should also be given to:

estate regeneration (page 175)	- How schemes seeking to diversify tenure can achieve the necessary uplift without pushing up densities too high. - How estate regeneration schemes can introduce a mix of uses in order to contribute to wider regeneration objectives. - Whether H10 should request justification for the demolition or redevelopment of existing housing, or any environmental evidence of whole-life cycles and the environmental harm caused by the demolition of buildings that are less than, say, 100 years. - What a satisfactory re-provision may encompass. - Referring to the need to take local circumstances into account, especially where a different tenure mix will help to contribute to an areas regeneration.
H11 Ensuring the best use of stock (page 177)	No comment.
H12 Housing size mix (page 178)	We support the ambition of H12 and the current market forces towards smaller units in highly accessible locations. However, there is still a great need to cater for larger families in these areas. H12 encourages downsizing to free capacity but this is rarely as straightforward as indicated. We feel that H12 will not help us to defend against solely one bed schemes, something that we have been strongly resisting at the local level. The policy should provide more assurances around the provision of larger units, particularly for affordable housing, in order to stimulate a better mix on site. The recognition of quality concerns over some HMOs are welcome and this reflects local experience. It is also considered that there are wider issues around HMOs and how these are being used to house some of the most vulnerable residents in Boroughs that goes beyond planning and the Council would encourage the Mayor to review this issue and provide strategic support.
Paragraph 4.12.3 and glossary (page 179 + 512)	We are concerned that paragraph 4.12.3 and the glossary is seeking to lower the definition of family housing by including references to family housing that "generally" or "historically" has three or more bedrooms and that families living in two-bedroom units should be taken into account when assessing the needs of different sized units. Families living in two-bedroom units may be doing so out of necessity rather than choice. Implying that two-bedroom units are suitable for families could lead to less family sized housing and an increase in overcrowding and a reduction in well-being.
H13 Build to rent (page 180)	We support H13 and acknowledge that the Plan notes the structural change in the housing market, leading to tenure shifts and eventually to an ever-growing number of Londoners renting from private landlords in an insecure and largely unregulated market. We are at the forefront of advocating Build to Rent and particularly the role that London Living Rent has in improving the quality of life for lower income renters. We support the creation of Build to Rent with a fully pepper-potted affordable split in the block with all renters offered longer tenancies - irrespective of tenure - if they want one.
H14 Supported and specialised accommodation (page 185)	We support specialist housing in H14 and the emphasis given to those in our community considered more vulnerable. However, to ensure these types of accommodation are sufficiently protected, H14 should specifically seek no net loss, or the re-provision of an equivalent amount of, specialist accommodation in the immediate vicinity.
H15 Specialist older persons housing (page 186)	We support H15 and older persons housing. We have an excellent track record in working with our partners to deliver older persons accommodation. Further consideration should also be given to: - Ensuring that the same design criteria will be applied to this form of housing in terms of architectural design, and internal space standards and the quality of living environments. - Whether H15 should seek no net loss, or the re-provision of, older persons housing, to ensure these types of accommodation are sufficiently protected. - Having a review period at 5 years to ensure that the benchmarked targets remain relevant.

H16 Gypsy and Traveller accommodation (page 190)	No comment.
H17 Purpose build student accommodation (page 193)	We support H17 and student accommodation. We have a number of universities and FE institutions and due to its good links to the Central London universities, we believe that our highly accessible location is appropriate for student accommodation. However, we feel that at least 50% of accommodation should be affordable.
H18 Large scale purpose built shared living (page 197)	We support H18 and recognise shared living as meeting a niche in the housing market. However, shared living schemes must be of sufficient quality, meet needs, be well located and connected, be well managed and provide minimum tenancy lengths and provides payment towards affordable housing too. We have a number of successful small schemes but there are concerns about large schemes providing substandard accommodation if they are not managed effectively. We note that some of the requirements are overly prescriptive e.g. concierge, linen changing and room cleaning. We also recognise that monitoring and enforcement responsibility resides with the Council and could prove time-consuming.

Plan Reference	Comments
Chapter 5 Social Infrastructure	
S1 Developing London's social infrastructure (page 202)	We strongly support S1 as we are already taking this approach. We are working closely with partners, in particular health through the One Public Estate initiative, and the asset related work which has emanated from Lewisham being one of the Health Devolution pilots. This includes co-location of public sector teams in Council and non-Council assets. Many voluntary sector organisations also provide services, commissioned and not, from Council buildings. S1 is in line with our aspirations for Catford town centre. Further clarity and detail is sought around the application of S1 and how the competing demands of social infrastructure can be balanced whilst still meeting the need to deliver affordable housing that is emphasises throughout the Plan.
S2 Health and social care facilities (page 204)	We strongly support S2 as we are already taking this approach. Many voluntary sector organisations and other health organisations operate from Council buildings, and vice versa. We are in partnership health partners through the One Public Estate programme, looking primarily at what services are required and where, better collaboration, resulting in new and improved facilities, co-location of local teams and releasing surplus land for new homes. S2 is in line with our aspirations for Catford town centre. Further consideration should also be given to: • Viability and what funding is available to pay for social and health facilities. • The need for agreement with local STPs for capital health projects. • The retention of capital receipts negotiated with Central Government. • The balance between provision of expensive health infrastructure and affordable housing.
S3 Education and childcare facilities (page 208)	We support S3 and encourage healthy routes to schools and other childcare facilities. S3 aligns with our current strategies, including whole system obesity, air quality action plans and cycling strategy. For instance, locating entrances and playgrounds away from busy roads can increase active travel and reduce exposure to air. We are also working with Goldsmiths and LeSoCo to integrate higher and further education into regeneration and development opportunities. Whilst we welcome policy S3 and the need to provide educational facilities to meet demand, some educational facilities are no longer in our control and we seek further guidance and support from the GLA on how we can deliver policy S3 at the local level.

	Further consideration should also be given to: • Strengthening S3 to enable all children to actively travel to school.
S4 Play and informal recreation (page 212)	We welcome inclusion of incidental, informal play and informal recreation space for children and young people wherever possible especially linked to safe accessible routes and connected green landscape corridors and spaces. This will encourage active lifestyle for improved physical health and mental wellbeing.
S5 Sports and recreation facilities (page 214)	We welcome good quality sports facilities especially when accessible by walking and cycling networks connecting and improving links across borough boundaries. However, we recognise that some leisure facilities such as 50 metre swimming pools and diving pools need collaboration over wider than local level. There is a need for the GLA to intervene from a funding perspective to ensure delivery of such infrastructure.
S6 Public toilets (page 218)	We feel policy S6 is more detailed than it needs to be. Instead the Plan should focus on providing strategic policies that are relevant to London as a whole whilst leaving detailed policies to be prepared at the local level through individual Borough's Local Plans.
S7 Burial space (page 219)	No comment.

Plan Reference	Comments
Chapter 6 Economy	
E1 Offices (page 224)	We fully support the future potential change of Lewisham to Metropolitan status in Figure A1.1. This is in line with our aspirations and one of the aspirations of the Lewisham Gateway Partnership. As a Borough Lewisham are seeking to grow the local economy and increase demand for business/office space. Policy E1 should recognise those future aspirations and not limit the ability of Local Authorities to secure suitable office accommodation based on current demands.
E2 Low-cost business space (page 227)	Whilst we support E2 and the provision and protection of low cost business space, E2 should remove reference to "in areas where there is an identified shortage of lower cost space". It implies that London Boroughs need to demonstrate that there is an identified shortage of lower-cost space but may not have the demand forecasts for B1 spaces outside of Opportunity Areas.
E3 Affordable workspace (page 230)	We welcome E3 and support start-ups and flexible work spaces. This is aligned with our current approach. Whilst E3 is detailed, it allows for tailoring at the local level so that we can accommodate our CDI Strategy, the Thames Estuary Production Corridor and support other business growth sectors that require spaces. Questions have been raised around and further clarity is needed on how this would be resourced if these spaces are in Council buildings.
E4 Land for industry, logistics and services to support London's economic function (page 232)	We generally support E4 that seeks to protect industrial and logistics capacity. We note that Table 6.2 identified Lewisham as retaining capacity. The Council believes that through the plan-led process alongside careful development management, that Lewisham has the ability to consolidate and intensify industrial land to enable the introduction of mixed use development. Provision at the local level should reflect demand for light industrial spaces (maker/production spaces) as well as specific heavy industrial uses (e.g. data centres to meet the needs of digital connectivity and storage to support digital industry growth aspirations).
E5 Strategic Industrial	We acknowledge that the SHLAA has not included SIL sites in order to protect designated industrial land. Some SIL sites are likely to come forward with planning applications that will seek to consolidate and intensify capacity whilst introducing new mixed use residential

Locations (SIL) (page 239)	development too.
E6 Locally Significant Industrial Sites (page 245)	We support E6 and already have policies in our Local Plan relating to LSIL.
E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function (page 246)	We are cautiously supportive of E7. We do have examples of where this is already happening such as Thomas Lane Depot in Catford where mezzanine development has led to the intensification of B1 use and allowed the introduction of film/theatre set-building. Although we have a small supply of industrial sites in our borough, we do have other sites where this could be tested, in particular, part Council owned sites where plans are already coming forward. Further consideration should also be given to: • How mixed-use development can work alongside heavy industrial uses, particular where those uses are 24/7 operations. • The need to work with potential commercial occupiers/tenants early in the design process • The degree to which residential values will be affected as a result. • The need to ensure access to highways infrastructure. Intensification in areas of the borough which are hard to get to or landlocked would create issues for access, servicing and will result in heavier vehicle movements on quiet roads. • Providing support to development that reduces floorspace but generates an uplift in jobs. • How commercial space will need to be designed robustly in order to effectively implement the Agent of Change policy. • Relocating existing uses, as this usually requires a lot of work. • The practicalities of commercial being completed and operational prior to any residential. Allowing a proportion of the residential to be occupied ahead of commercial can assist in seeing schemes delivered. • How a move away from SIL to mixed use employment could promote wider regeneration benefits and improve the quality of the environment. • How car parking will be dealt with as parking facilities needed for trade collections and deliveries. • What is the adequate amount of separation between residential and commercial to mitigate against "bad neighbour" impacts.
E8 Sector growth opportunities and clusters (page 252)	We support E8 as it will assist with our aspirations for growth in: • CDI sector - Creative Enterprise Zone in New Cross/Deptford and the Thames Estuary Production Corridor. • Business Support Sector – one of our largest employment sectors and likely to be the next growth sector identified by local economic assessment. • Advanced urban services – such as architecture, urban design falls within our CDI sub-sectors where we have leading –edge from proximity to Goldsmiths. • Tourism – supports growth of our evening economy and heritage sites and culture. • Goldsmiths - Lewisham's role in London as a centre of higher education of national and international importance. • Strategic Outer London Development Centre - assist with economic growth away from the high streets for particular sectors, such as creative production in "Deptford Tangle" and heritage sites.
E9 Retail, markets and hot food takeaways (page 256)	The approach of having a differing retail role within different types of centre is aligned with the aspirations for how we foresee our town centres changing in the future. We strongly support E9 and the restriction on A5 hot food take away. Lewisham adopted the same type of policy as E9 in 2014 which has allowed applications to be refused and there has been a significant reduction in the number of applications submitted. London has the highest levels of childhood obesity in England and E9 can do much to support reducing obesity levels and inequalities. Areas of high deprivation have significantly more fast food and takeaway outlets than affluent areas. Restrictions on A5 hot food takeaway is an

	element of the whole systems approach to obesity, which we are promoting at Lewisham.
	Whilst we support the Healthier Catering Commitment, we seek clarification on who would fund the requirement to achieve and comply with the standard.
E10 Visitor infrastructure (page 261)	We support E10, as we are developing a new Cultural Strategy which will aim to increase visitor numbers to Lewisham and maximise the top 10 visitor attractions.
	Questions have been raised that E10 is overly detailed prescriptive in terms of accessibility as this may restrict the development of future accommodation for visitors.
E11 Skills and opportunities for all (page 263)	In addition to employment, skills development, apprenticeships etc development proposals should also seek to support London based SMEs. With 1/5 of all SMEs (FSB) operating in the construction sector, it is important to consider and capture the contribution made to employment, apprenticeship and London Living Wage outcomes by SMEs (including addressing low pay). Development proposals should secure opportunities across a wider spectrum of stages outside of construction and end use. Concept/Developed design stage should be considered.

Plan Reference	Comments
Chapter 7 Heritage and Culture	
HC1 Heritage conservation and growth (page 268)	We support HC1, especially the use of a Heritage Strategy, in line with the NPPF and a more detailed policy on archaeology.
	Questions have been raised that HC1 implies that assessments of Heritage Assets should be done in advance (as opposed to current London Plan where this takes place when development is proposed). HC1 also encourages more proactive work on Heritage at Risk than the current London Plan. London Boroughs will need to identify specific opportunities for Heritage at Risk to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.
	Further consideration should also be given to: • Whether the policy should be worded differently as it is very interpretive and not clear. What is meant by 'creative contextual architectural responses'? What is meant by 'utilising the heritage significance of a site or area in the planning and design process'? • Whether there can be better integration between heritage and design policies or make direct references to each other. Development should consider both heritage and design together in tandem and London Boroughs now have Design and Conservation Officers as one role, or at a minimum work as a coordinated department as a result of the current London Plan.
Paragraph 7.1.9 (page 276)	Boroughs are expected to develop up-to-date Archaeological Priority Areas, which are classified using a tier system. This is more prescriptive than current Plan.
HC2 World Heritage Sites (page 278)	HC2 provides a more detailed policy on World Heritage Buffer Zones and places additional requirements on London Boroughs including neighbouring boroughs being part of the World Heritage Site Steering Groups and the requirement for Heritage Impact Assessments where development proposals have the potential to harm World Heritage Site.
HC3 Strategic and Local Views (page 280)	HC3 is supported as it allows tall buildings to be considered strategically, rather than just wherever they are proposed.
	There are a number of areas in the borough that provide amazing views, e.g. Blythe Hill Fields but there will be an additional requirement for London Boroughs to identify local views. How will this effectively be used to refuse development which negatively effects identified views?
HC4 London View	Support HC4 and the London View Management Framework.

Management Framework (page 285)	
HC5 Supporting London's culture and creative industries (page 287)	We support HC5 as it will assist with our CDI Sector growth, Creative Enterprise Zone and Thames Estuary Growth Corridor.
HC6 Supporting the night-time economy (page 292)	Whilst we support HC6, equal consideration should be given to protecting and supporting evening and night-time cultural venues and anti-social behaviour that impacts on the safety of other visitors. HC6 should also promote good health by emphasising that the diversity of night time economy includes options that don't involve alcohol.
HC7 Protecting public houses (page 297)	We support HC7 as it encourages refusal of schemes that result in the loss of public houses. This reflects the strong approach that we are taking to protect public houses in our borough.

Plan Reference	Comments
Chapter 8 Green Infrastructure and Natural Environment	
G1 Green infrastructure (page 302)	We support G1 and the need to protect and enhance the network of green and open spaces and the multi-functional importance of green infrastructure. Questions have been raised that may require further guidance on regionally adopted green infrastructure typologies to be provided. Further consideration should also be given to: • Including in the list of objectives, mitigating against the urban heat island (UHI) effect and improving air quality. • Including multiple functions and benefits for economic, social and environmental parameters in G1 (C1). • Including natural capital accounting principles, so that the monetary value of recreation, property values, and physical health is realised. In this way one is better able to understand the capital value of the asset which has traditionally been thought of as a financial/accounting liability and it can clearly demonstrate that for every £1 invested the return may be tenfold. • Including the impact that some forms of GI can have on water and energy consumption and subsequent greenhouse gas emissions. This should assist in ensuring that there is at least a neutral impact on consumption and emissions. • Using green infrastructure as the basis for landscape led planning. • Incorporating these key features within green infrastructure: linear landscape features such as railways, water courses and green walks, parks and open spaces, woodlands, allotments and community gardens/orchards, areas of connected rear gardens, green spaces around flats and apartments. • Using green roofs and street trees to mitigate losses as development intensifies.
G2 London's Green Belt (page 303)	We acknowledge G2's continued protection for the Green Belt. We feel that this will place additional burdens on inner London boroughs to accommodate the level of housing to meet London's need. We therefore promote a more balanced approach which also relies on releasing parts of London's Green Belt in a strategic and planned manner. Further consideration should also be given to providing appropriate multifunctional uses for Green Belt that is judged as having a low

	ecological value in order to address pressure on existing public open space in urban areas.
G3 Metropolitan Land (page 304)	We recognise the importance of MOL land as being key components of the borough's green infrastructure and support their protection, as advocated in G3. Questions have been raised where we feel that there may be certain instances where boundary changes to MOL land should be allowed providing there is strategic reasons for doing so. For instance, our plans for Catford Town Centre, which share aspirations with all the other policies in the Plan, need to utilise an area of MOL in the town centre to re-align the A205 and create a better town centre place, with significantly improved public realm, pedestrian and cycle facilities/connections, new homes/jobs and potential new N-S connections to accessible open spaces.
G4 Local green and open space (page 305)	We support G4, especially the approach to protecting and creating local green and open space in order to address areas of deficiency and the need to link open spaces across borough boundaries.
G5 Urban greening (page 308)	We are broadly supportive of G5 and believe that this could be a relatively rudimentary but useful tool to assess the merit of green proposals in development schemes. We feel that this additional consideration could lead to a more protracted planning application process (as D2 above). Further guidance on how London Boroughs should implement this policy at the local level would be appreciated. Further consideration should also be given to: • How UGF will be monitored. • How urban greening will be balanced against the need to develop new homes, jobs and services. If applied rigidly, target UGF scores may make it difficult to approve development proposals which are otherwise appropriate and suited to their local context. • How UGF should be applied whilst tailoring it to local circumstances in order to avoid standardised surface cover across the borough.
G6 Biodiversity and access to nature (page 311)	We support G6, especially as it gives protection to SINCs, balances conservation interests with community access, encourages links between green corridors and reflects Lewisham Biodiversity Action Plan processes and Lewisham Biodiversity Planning Guidance.
G7 Trees and woodlands (page 313)	We support G7 and in particular the provision of street trees that are appropriate to their locality. Further consideration should also be given to: • The principle of right tree, right location as large canopy trees can cause structure damage to buildings and underground services and smaller species may be more suited to the local character and will have the net effect of lowering maintenance liability, especially for private landowners. • Promoting large canopied trees where space allows. • Promoting Veteran tree identification and protection. Tree surgery techniques are being refined for retrenchment to extend longevity of these veteran trees. • Identifying strategic planting locations for large canopied trees, to contribute to London's Urban Forest. • The need for healthy and sustainable tree root development with sufficient rooting space within developments and in growth areas. • The need to consider ancient woodland that due to its limited size has not been formally recorded on the ancient woodland inventory.
G8 Food growing (page 315)	We support G8, especially protecting and encouraging the provision of allotments and encouraging community gardening and food growing. This should be the priority for resources. Brockley was renowned as an area of market gardens especially recognised for its pear orchards and this should be recognised at the local level.

	Questions have been raised that commercial food production is unlikely to ever be implemented given demand on open spaces.
G9 Geodiversity (page 316)	We support G9 as we have a number of candidate RIGs and LRIGs in our borough that we will need to consider in the future.

Plan Reference	Comments
**Chapter 9 Sustainable Infrastructure**
SI1 Improving air quality (page 320)	Whilst we support SI1, this policy assumes input from London Boroughs environmental health teams. SI1 would also involve new technical assessments. We feel that this extra analysis should be provided by a specialist GLA advisory / consultee team instead of relying on London Boroughs that do not have the technical expertise to fully implement the policy.

We welcome the proposed guidance in relation to air quality neutral and positive approaches.

We feel that the introduction of air quality offset fund is complex and there are concerns about applying this measure as it will mean that the ongoing issue of air pollution from developments will be difficult to improve. It may also constitute a breach of EU obligations.

Further consideration should also be given to:
- Mentioning in 9.1.3 green infrastructure and its ability to improve air quality.
- Mentioning in 8.1.2 that green infrastructure isn't just an 'add on'.
- How data from smart infrastructure such as sensors could assist in responding to poor air quality. Air quality sensors are being rolled out across the capital to provide a more accurate picture of atmospheric pollution, but it is unclear as to how this will be used.
- Who has the responsibility of reading and responding to data collected?
- How an increased monitoring network will assist with understanding air quality.
- Making it clear whether SI1 just relates to activities from developments or the ongoing operations of the development.
- How off-site air quality mitigation measures could be implemented if it isn't practical to do so on site.
- Making better cross references between SI1 and G1.
- How changes proposed to transport will reduce the emissions from source with the expansion of the ULEZ.
- How design of new developments will be crucial to ensure no increase in exposure.
- The need to identify specific actions to reduce impacts in Air Quality Focus Areas.
- Balancing the competing aims of being a major urban area, the need to build more homes and the National Park City concept. |
| **SI2 Minimising greenhouse gas emissions** (page 324) | We strongly support SI2, especially the intent to minimise greenhouse gas emissions and the new higher price for carbon. We agree that London Boroughs should be able to charge a higher rate where a local price has been established.

SI2 would also involve new technical assessments. We feel that this extra analysis should be provided by a specialist GLA advisory / consultee team instead of relying on London Boroughs that do not have the technical expertise to fully implement the policy.

Effective adaptation and mitigation of climate change depends on policies across multiple scales including within the London Plan. The Plan should include the regional adoption of a Representative Concentration Pathway (RCP) scenario. This would support London boroughs to adequately assess the risk and implement local planning conditions for development which would adequately address risks identified in the UK Climate Change Risk Assessment, and the pending UK Climate Projections (UKCP18). This applies not just to greenhouse gas emissions but also to a number of other strands, particularly green and blue infrastructure and waste.

Further consideration should also be given to: |

	- Strengthening the wording of 'should aim to'. This makes it easy for developers to work around the targets. Stronger wording will place the responsibility back on developers to demonstrate how and why they can't meet the reduction targets. - Whether data exists to show if new developments are meeting predicted energy ratings once constructed and occupied. - How reporting should be implemented. This is necessary to provide clarity on whether this is going to increase demands on officer time. - How quarterly reporting immediately post construction, would allow problems to be rectified earlier.
SI3 Energy Infrastructure (page 329)	Whilst we support SI3 and have ambitious plans to connect development in the north of the Borough to SELCHP, we have some experience of, and concerns about, some decentralised energy networks and communal heating systems. Overheating and high energy bills for tenants are particular issues that need to be rectified. There are also questions about whether these systems are delivering the stated carbon savings, as evidenced in our Housing Select Committee's scrutiny report on communal heating: http://councilmeetings.lewisham.gov.uk/documents/s37476/Communal%20Heating%20Report.pdf and the response to Mayor and Cabinet on its recommendations: http://councilmeetings.lewisham.gov.uk/documents/s38782/Response%20to%20SDSC%20Communal%20Heating%20Review.pdf Monitoring and reporting on energy performance for major developments in SI2 will help address the problems of predicted and actual performance that have affected some communal systems. Policy SI3 should also be strengthened by emphasising that communal systems are designed, built and maintained to the highest industry standards (such as through the CIBSE Code of Practice for Heat Networks) and are planned in an integrated way to supply as diverse a profile of demand as possible. This would accord with our ambitions to maximise the energy generated from SELCHP and facilitate wider decentralised energy schemes in the north of the borough. SI3 would also involve new technical assessments including energy masterplans. We feel that this extra analysis should be provided by a specialist GLA advisory / consultee team instead of relying on London Boroughs that do not have the technical expertise to fully implement the policy. Further consideration should also be given to: - Providing further details on how to apply this policy to large-scale developments. - How energy masterplans for town centres and Opportunity Areas will be resourced. - Providing better linkages between SI3 and SI5. There is a strong energy water nexus that should be considered between the two and as such, both policies should take into consideration the other. - The need for cross boundary work, with the GLA shouldering the burden for regional scale networks. - Whether there is any benefit to the loss of the target for 25% heat and power to be generated in London by 2025 - What agency is responsible for the installation of meters and the collection, monitoring and action on data?
SI4 Managing heat risk (page 334)	Whilst supporting SI4 and the concept of managing heat risk, this policy assumes input from London Boroughs environmental health teams. SI4 would involve new technical assessments. This extra analysis should be provided by a specialist GLA advisory / consultee team instead of relying on London Boroughs that do not have the technical expertise to fully implement the policy. Further consideration should be given to: - Including these options: adequate space for the provision of green infrastructure and vegetation, roof materials with a low solar reflective index, shading of hardscape, water sensitive urban design, provision of water bodies and water courses and roof materials. - Emphasising the link between green infrastructure and reducing Urban Heat Island effect. The use of green roofs and walls has been

	noted, however to have a significant cooling role, green roofs and walls must have plants with high transpiration rates. This has a water demand, which may in some cases contradict policy SI5 Water Infrastructure.
SI5 Water infrastructure (page 336)	We are generally supportive of SI5. Further consideration should be given to: • Mentioning integrated water management earlier in this policy. This relates to all aspects of water including potable supply, waste water removal, surface water runoff and flood water. • Ensuring that integrated water management strategies (IWMS) are essential for all major developments not just 'Opportunity Areas', as this will improve the sustainability of the whole water system. • Ensuring the monitoring of water usage should occur on site. The use of hot water and water consumption has links to greenhouse gas emissions. Smart sub-metering should be included on i) the main lines to the building ii) the main line to the heating / cooling systems of the building and iii) the main irrigation line. • Reducing ambiguity in the policy wording, e.g., 'be encouraged to incorporate measures'. This type of phrasing makes it easy for developers to work around the need for water savings and reuse infrastructure. • Reducing ambiguity in the policy wording, e.g. Does 'seek to improve the water environment' mean achieving good ecological status for surface water as per the Water Framework Directive? • Including a definition of 'waterborne freight handling use' in the glossary' • What agency is responsible for the installation of meters and the collection, monitoring and action on data?
SI6 Digital connectivity infrastructure (page 341)	We are generally supportive of SI6.
SI7 Reducing waste and supporting the circular economy (page 344)	To be able to implement SI7 effectively, we request further guidance about how to enforce the Circular Economy statement and how we should monitor at each stage.
SI8 Waste capacity and net waste self-sufficiency (page 347)	No comment.
SI9 Safeguarded waste sites (page 355)	No comment on policy SI9. We highlight that paragraph 9.9.2 suggests waste site release should be part of a plan-led process. This, is already taking place as we work with other Local Authorities as part of the South East London joint waste planning group to pool our waste apportionment requirements and identify sufficient capacity at safeguarded waste facilities across south east London to meet these requirements.
SI10 Aggregates (page 356)	No comment.
SI11 Hydraulic fracturing (Fracking) (page 358)	No comment.

SI12 Flood risk management (page 359)	SI12 should provide stronger guidance on the adoption of a regional approach to the inclusions of climate change projections within planning, as flooding was identified as a key risk within the UK Climate Change Risk Assessment 2017. The use of consistent Representative Concentration Pathway (RCP) scenarios within flood risk management assessments will assist developers and will help to identify adequate management strategies.
SI13 Sustainable drainage (page 361)	We support SI13 and recognise the important role that sustainable drainage plays. Opportunities would be welcomed for the Mayor to explore the provision of specialised support in this area through a centralised advisory/consultee resource where Local Authorities do not have the capacity. Further consideration should be given to: - Strengthening the wording of SI13 so that proposals for impermeable paving should be refused, including on small surfaces such as front gardens and driveways, unless this can be shown to be unavoidable and contributing to wider benefits. - How drainage should be managed as close to its source to prevent localised flooding. - The need to retain existing water bodies and vegetation where possible. - The need to minimise the effective imperviousness of the development - The need for small rainfall events to be managed on site. - The need for overland flow paths where possible to minimise local flooding - The need to incorporate natural water bodies within storm water management systems.
SI14 Waterways - strategic role (page 363)	No comment.
SI15 Water transport (page 368)	We are generally supportive of SI15 and we accept the need to keep wharves under review.
SI16 Waterways - use and enjoyment (page 371)	We are concerned that new mooring facilities should always be considered when developing next to waterways. This may not be possible in all instances and could jeopardise the development of riverside sites where wider regenerative benefits are already planned.
SI17 Protecting London's waterways (page 373)	No comment.

Plan Reference	Comments
Chapter 10 Transport	
T1 Strategic approach to transport (page 402)	We are generally supportive of T1. We agree that, with growing concerns over air quality and public health, and the need to provide new homes for Londoners in a sustainable way, there should be a renewed focus on reducing car usage. However, we recognise that the target of 80% of journeys to be made by foot, cycle or public transport by 2041 will be challenging. This is equivalent to a third of all car trips transferring to other modes. As much of the borough has a low PTAL (3 or less), this target will not be met with the level of infrastructure proposals that are currently committed in TfL's Business Plan. BLE will only benefit the locations in the borough where the PTAL is already high, so significant investment in public transport will be required to achieve this level of modal

	shift.
	Further commitment should be given to:
	• Better links between the north and south of the Borough, as well as better orbital links,
	• Phase 2 of the BLE to Hayes,
	• Delivery of our Rail Vision,
	• Delivery of our Cycling Strategy, including Cycle Superhighway,
	• Improved bus services across the south of the Borough,
	• Orbital as well as radial public transport links.
T2 Healthy streets (page 403)	We strongly support T2 and we embrace the healthy streets agenda. We have already implemented projects such as the North Lewisham Links and the joint project between TfL and our Council to re-route the A205 road through Catford town centre will contribute to the Healthy Streets Approach. Healthy Streets have the potential for reducing health inequalities and improved health outcomes for all and it fits well with our whole systems approach to obesity and air quality action plan. Further consideration should also be given to: • TfL removing advertising of high fat, sugar and salt foods across the transport network. • How CIL/S106 funds can be used to generate sustainable transport and healthy streets.
T3 Transport capacity, connectivity and safeguarding (page 406)	We generally support T3 but question how we deal with the situation where an increase in transport capacity is needed to support a development but where no firm plans and funding exist to deliver transport schemes, such as BLE. London Boroughs are in consultation with the Mayor, to identify package of strategically important transport infrastructure (and improvements to public realm) along with funding streams to deliver them and it is our position that MCIL needs to be used to fund BLE.
Table 10.1 - Indicative list of transport schemes (page 407)	We propose that Table 10.1 includes the realignment of the A205 through Catford town centre, as this will result in improvements to road capacity, environmental enhancements and will contribute to the Heathy Streets. Table 10.1 should also include the safeguarding of existing bus garages? Additional wording should be added to Table 10.1 in relation to BLE so that it includes stations and adjacent public realm and approaches.
T4 Assessing and mitigating transport impacts (page 412)	We support T4, especially assessing/mitigating transport impacts and the healthy streets approach which is key for physical activity and tackling health inequalities. It is consistent with the approach we already take. Questions have been raised that T4 is overly detailed in so far as it requires Transport Assessments for all applications and this is unnecessarily bureaucratic as TfL guidance does not require this. Further consideration that should also be given to: • Including words such as requiring Transport Assessments 'where appropriate or necessary'. • Making T4 more applicable to all scales of development across London. • Including words such as 'road danger *on roads and to users of all transport networks*.
T5 Cycling (page 414)	Whilst we support T5 as enhancing cycling provision and activity aligns with our aspirations for the borough, further guidance is requested in terms of implementing this policy. Further consideration should also be given to: • How the requirement for 1.5 spaces for a 1 bed flat development can be delivered. • The facilities required for disabled cyclists, e.g. Reserving specific spaces which provide step-free cycle parking and accommodate

	adapted cycles.
	• The facilities and space required for other non-standard cycles such as tricycles, cargo bicycles and bicycles with trailers, for both long-stay and short-stay parking.
	• Cycle parking that is delivered to as high a standard as possible, as opposed to just delivering as many spaces as possible.
	• Rewording of T5 to ensure there is no easy 'opt out' of off street provision for developers.
	• Including mobility scooter parking and charging facilities to improve accessibility for residents with limited mobility. Developments and the public realm should also be accessible to people using mobility scooters.
	• Including secure buggy/pram parking at nurseries to make it convenient for parents to drop off children and leave/store their pram as part of a linked trip (i.e. trip to work).
	• Developers really should be providing residential cycle parking off street within a development instead of working with developers to work with bike hanger providers.
	• The provision of cycle hubs in town centres and at rail stations.
	• That the loss of car parking space in favour of cycle parking will be contentious, and this space could be used for other functions such as cycle lanes or widened footways instead.
Figure 10.2 - Areas where higher minimum cycle parking standards apply (page 418)	We support Figure 10.2 that identifies Lewisham as an area where higher minimum cycle parking standards apply.
T6 Car parking (page 420)	We acknowledge that the car parking standards are different from the current London Plan standards. Whilst we support car free developments, we only accept car free development when the site is a location with a high PTAL, and/or if the site is in a CPZ. Less than half of the borough has a CPZ, and more than half of the borough has a PTAL less than 4 so there are limited opportunities to create car free developments until public transport improvements and further CPZs are implemented. Whilst we are confident that car free development can be delivered in PTAL 5-6 areas, there is a concern that it may not be appropriate in all PTAL 4 areas and in these areas each development should be assessed on a case by case basis.
T6.1 Residential parking (page 423)	Questions have been raised with T6.1 as many locations within Lewisham that have PTAL 4 are not with a CPZ i.e. Sydenham, Forest Hill, Perry Vale Brockley Telegraph Hill and Honor Oak. Car Free developments in these locations would have a significant impact on existing residents
T6.2 Office parking (page 426)	Questions have been raised with T6.2 as the proposed parking standard for Office B1 in Inner London to be car-free will have an impact in locations where there is no CPZ to control/restrict. Likewise, the proposal for retail in PTAL 5 and 6 to be car-free will have an impact in locations where there is no a CPZ.
T6.3 Retail parking (page 427)	No comment.
T6.4 Hotel and leisure uses parking (page 428)	No comment.
T6.5 Non-residential disabled persons parking	No comment.

T7 Freight and servicing (page 430)	We are cautious of T7 as deliveries in the evening or night time will have noise impacts on residents. We would require agreement from the Environment Team before agreeing to evening/night time deliveries.
T8 Aviation (page 433)	We support T8 from a transport perspective and encourage access to airports by sustainable modes of travel but recognise that flight paths could impact on Lewisham especially in relation to noise and air quality. Lewisham will be responding to the Heathrow consultation.
T9 Funding transport infrastructure through planning (page 436)	We support T9 including the continued use of MCIL to fund strategic transport infrastructure and we acknowledge that both phase 1 and phase 2 of the BLE are of strategic importance to the capital, as outlined in the London Infrastructure Plan 2050, and the Mayors Transport Strategy (2017). We stress that MCIL2 should be used to fund the BLE, as it is a strategically important London transport project that supports housing, employment and regeneration ambitions and will deliver Good Growth. It will also be necessary to explore alternative potential funding mechanisms for the BLE, including funding from Central Government, or other methods such as land value capture and upfront private investment.

Plan Reference	Comments
Chapter 11 Funding the London Plan	
DF1 Delivery of the Plan and Planning Obligations (page 441)	We are generally supportive of the policies related to infrastructure, and we welcome the continued commitment to delivering infrastructure that underpin the Mayor's Good Growth ambitions. The narrative around the Plan's focus on the need to better integrate transport, infrastructure and affordable housing investment is particularly compelling. We are strongly supportive of the continued commitment to the delivery of strategic transport infrastructure including the Bakerloo Line Extension (BLE). However, to achieve Good Growth both Phase 1 and Phase 2 of the BLE will need to be delivered. It will also be essential for strategic transport infrastructure to access Mayoral CIL funds, as well other funding options. The Plan recognises that these funding sources will play an increasing role in supplementing the funding of a wide range of future infrastructure delivery. We would welcome further details and support from the Mayor and Central Government over the resource implications of the Plan; relating to both the capital funding of the infrastructure championed within the Plan and the impact on London Boroughs resource in managing this process, which are already under considerable pressure. This would help to ensure the Plan is deliverable and can be found sound. We have concerns about prioritising planning obligations for affordable housing over other types of infrastructure. This would have implications on key town centre mixed-use scheme in the borough (such as Catford) where a mixed focus on the provision of jobs, economy, retail, leisure, civic, culture and community needs to be balanced against other demands such as affordable housing. Furthermore, the NPPF provides sufficient guidance on the role of planning obligations and London Boroughs should retain the ability to negotiate planning obligations and apply discretion to tailor funding to both strategic and local circumstances. This is necessary to reflect the unique local funding context related to both S106 and CIL and so that health and education can be better embedded into development obligations. Funding should also be allocated in a targeted way to make use of the opportunities that arise and to ensure new development helps to reduce inequalities across the borough.

Plan Reference	Comments
Chapter 12 Monitoring	
M1 Monitoring and Table 12.1 Key Performance Indicators (page 458)	We broadly support policy M1 and Table 12.1 but note that they are prescriptive and could lead to a more protracted planning application process due to: • Applicants having to provide additional information that is not currently requested, making it harder for them to submit an application, • The need to collect, collate, input additional planning data into the LDD. It will take time for London borough's to make changes to their internal monitoring processes in order to capture this extra data. • Not all of the extra data being available to monitor at the start of the Plan period. We welcome the target to get all Londoners doing two x 10 minute active travel a day, monitored in conjunction with the provision of cycle parking. Questions are raised however around the resource implications of these monitoring commitments on Local Authorities.