

**Lewisham Local Plan 2040 – Examination in Public
Regulation 19 Schedule of Support and Objection – prepared in support of planning appeal**

October 2023

Introduction

The following paper provides a factual overview of the supporting and objecting representations submitted to the Lewisham Local Plan making process during the Regulation 19 Consultation stage: March – April 2023. The schedule identifies the supporting and objecting comments in plan-order. The schedule seeks to differentiate between supporting and objecting representations. However, it must be noted that some submissions express broad support in principle, either to the Plan or the relevant policy, but still seek modifications to the detail. The paper seeks to identify these accordingly. Those policies or sections of the new Local Plan that have not received any comments, either supporting or objecting, are shown as blank.

For clarification, the paper anonymises individuals who have submitted representations. All original representations are published on the Lewisham Council website - [Lewisham Council - Current and future consultations](#)

The paper has been produced to support the plan-making process to serve as an index of support and objection.

Chapter/ Policy/ Paragraph	Supporting/ Objecting	Commentary
Consultation	Support	<ul style="list-style-type: none"> • Blackheath society provide broad support for consultation process.
Consultation	Object	<ul style="list-style-type: none"> • Resident objects to scale and nature of public consultation (Allan Hall) • Resident states that they do not have faith consultation. • A resident suggests that consultation deeply flawed. • A resident questions consultation. • Bell Green Neighbourhood Group questions consultation process. • Resident objects to accessibility of consultation – difficult to obtain information. • A resident objects to the quality of the consultation process – specifically in respect of how the consultation was managed through the pandemic period. • Resident states that the Reg 19 consultation was difficult to understand. • Urban Development Reform Organisation object on the grounds that consultation on the plan was complex and confusing.
General Comment - document	Object	<ul style="list-style-type: none"> • Resident states that the submission document is overly complex. • Resident states that it was difficult to comment due to the scale, number and complexity of documents being consulted upon.

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General Comment – Transport	Object	<ul style="list-style-type: none"> TfL suggest that ‘Public transport accessibility’ should be replaced with ‘public transport access’ or ‘access to public transport’, throughout the local plan, for consistency with the London Plan. ‘PTAL’ as defined in the London Plan means ‘public transport access level’.
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Chapter/ Policy/ Paragraph	Supporting/ Objecting	Commentary
Part One – Planning for an Open Lewisham		
Chapter 1 About Lewisham’s Local Plan		
Chapter 2 Lewisham Today and Planning Ahead		
	Support	<ul style="list-style-type: none"> Lewisham and Greenwich NHS Trust are broadly supportive of the content but suggest some additional text in relation to health and wellbeing.
	Object	<ul style="list-style-type: none"> St Dunstan’s Educational Foundation comment on the statistical data relating to health and well-being; specifically, obesity.
Chapter 3 Vision, Strategic Objectives, and the Spatial Strategy		
Vision for Lewisham	Support	<ul style="list-style-type: none"> Lewisham and Greenwich NHS Trust support the content.
Strategic Objectives	Support	<ul style="list-style-type: none"> TfL support the Strategic Objectives – subject to a minor addition to include reference to active travel alongside public transport; and explicitly providing policy support for Low Traffic Neighbourhoods in Strategic Objective G17.
Table 3.2 Lewisham Local Plan – Strategic objectives		
Policy OL1 Delivering an Open Lewisham (spatial strategy)	Support	<ul style="list-style-type: none"> Artworks Creekside strongly support the continued strategy. Lewisham House No.1 support the spatial strategy. HPG support the spatial strategy. Residents, CA Ventures, and Fifth State express strong support for the spatial strategy. GHL (Leegate) express support for the spatial strategy.

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		<ul style="list-style-type: none"> • Kitewood Estates support the spatial strategy. • Historic England support the spatial strategy.
Policy OL1 Delivering an Open Lewisham (spatial strategy)	Object	<ul style="list-style-type: none"> • TfL and TTLP suggest that the spatial strategy be expanded to allow growth beyond the identified growth centres, nodes, and corridors in other places with good access to transport networks. • Lewisham and Greenwich NHS Trust are broadly supportive of the spatial strategy but seek additions to the text in relation to securing developer contributions towards infrastructure networks. • Home Builders Federation objects to the policy approach suggesting that it should be strengthened to set out how residential development will be supported in the locations outside of those specified. • TfL suggest that the spatial strategy be expanded to allow growth around other railway stations (not currently identified as growth points). They also recommend that the plan clearly articulates that whilst the spatial strategy is not reliant on the BLE, the BLE remains a key spatial objective. • The GLA appear to imply that the spatial strategy is unsound because it has not been positively prepared - namely it does not respond to the Borough's needs; specifically in relation to meeting demand for Strategic Industrial Locations. The GLA raise this as a matter of general conformity under the specific policy heading (below).
Part Two – Managing Development		
Chapter 5 High Quality Design		
Policy QD 1 Delivering high quality design in Lewisham	Support	<ul style="list-style-type: none"> • Artworks Creekside continue to support the qualitative criteria. • Astir Living Limited state their support for the policy approach. • Tesco Stores Ltd support the policy approach. • Residents, CA Ventures and Fifth State express broad support for the policy but suggest that additional text be added to promote development at optimal capacity. • GHl (Leegate) support the policy support.
Policy QD 1 Delivering high quality design in Lewisham	Object	<ul style="list-style-type: none"> • Sainsbury's Supermarkets Ltd seek a detailed addition to the policy wording to allow a more permissible regime should site specific constraints dictate.

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		<ul style="list-style-type: none"> • SEGRO PLC object to the policy and state that it should clarify which developments should be referred to the Design Panel or developers will face unnecessary additional costs and a lengthier planning application process. • TTLP are supportive of the policy but state that it should also promote growth in areas which have high transport connectivity but are outside of the identified local centres. • Home Builders Federation objects to the policy approach – specifically in terms of how the new Local Plan seeks to secure infrastructure investment through new growth.
Policy QD 2 Inclusive and safe design	Object	<ul style="list-style-type: none"> • McCarthy Stone object to the policy approach as they do not wish to provide accessible housing for their customers, until that requirement forms part of the Building Regs Part M.
Policy QD 3 Public realm and connecting places	Support	<ul style="list-style-type: none"> • TfL express support for the policy approach.
Policy QD 3 Public realm and connecting places	Object	<ul style="list-style-type: none"> • Resident suggests that the provision for quality street level amenities is important and can be easily forgotten • SEGRO PLC object to the policy. They state that the policy should note that public art provision will likely be a requirement for <i>'important major'</i> development, not all major development.
Policy QD 4 Building Heights	Support	<ul style="list-style-type: none"> • Artworks Creekside support approach to building heights. • Bellway Homes Ltd and Peabody Developments Ltd are supportive of the policy approach although also comment that it may be overly prescriptive. • Lewisham House No.1 are broadly supportive of the policy but note that some aspects may be overly prescriptive. • Fosfel Apollo Limited support the approach to building heights. • Vision Construct Ltd and Evelyn Court (Deptford) LLP support the approach to building heights. • London Borough of Bromley support the policy approach – subject to a minor addition that references possible impacts on neighbouring boroughs. • Historic England support the policy approach.
Policy QD 4 Building Heights	Object	<ul style="list-style-type: none"> • Resident objects to approach towards tall buildings (Alexander Taylor) • Resident objects to approach towards tall buildings for Bell Green and Lower Sydenham.

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		<ul style="list-style-type: none"> • Blackheath Society unhappy with the technical evidence and associated consultation (how it considered responses) • Culverley Green Residents Association object specifically in relation to proposed building heights and consequential development quantum. They state that the proposed heights are unsuitable for Bellingham, Catford and Lee Green • Resident objects to approach to tall buildings – specifically the possible heights identified for buildings around Bell Green and Stanton Square. Suggests that the evidence is flawed. • Resident objects to approach towards tall buildings for Bell Green and Lower Sydenham. • Artworks Creekside make detailed objection to Policy QD 04 D. • Astir Living Limited object to the policy suggesting that it is not consistent with the London Plan and that their land interests can accommodate taller buildings. • Barratt London broadly support the proposed locations where tall buildings are considered to be appropriate within the Bell Green and Lower Sydenham Opportunity Area but are seeking greater flexibility for taller buildings. • Landsec object to the policy approach – specifically in relation to their land interest, at Lewisham Shopping Centre, which they believe can accommodate a taller building. • Tesco Stores Ltd object to the policy – primarily because they consider their site can accommodate a taller building. • St Dunstan’s Educational Foundation object to the policy and seek a more permissive approach that allows taller buildings in Catford Town Centre – specifically on their land interest. • The Renewal Group express broad support for the policy, specifically that it identifies their land interest as being suitable for taller buildings, but object to the identification of maximum heights and the requirements that taller buildings demonstrate quality design. • Residents, CA Ventures and Fifth State support the policy in principle but object to Part D, which they suggest proscriptively hinders development proposals beyond the identified maximum height capacity. • Bellway Homes Ltd are broadly supportive of the policy but believe it is overly prescriptive and that the word maximum should be replaced with “appropriate”.
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		<ul style="list-style-type: none"> • GHL (Leegate) questions the evidence base used to inform the policy; the consistency with the London Plan; and suggest that their site can accommodate a taller building. • SANTANDER C/O LASALLE INVESTMENT MANAGEMENT raise questions in relation to the approach to building heights, with the specific view of securing a higher quantum on their land interest. • Lewisham and Greenwich NHS Trust are broadly supportive of the policy but consider that their site can accommodate taller new buildings. • The CPRE object to the policy approach stating that Housing should be limited in height and ‘human-scale’ – eight storeys maximum – to halt a worrying move to super high density without adequate access to open and green space. • The GLA are broadly supportive of the policy approach but are seeking detailed amendments to make the policy more-sound.
Policy QD 5 View Management	Object	<ul style="list-style-type: none"> • Blackheath Society suggest the inclusion of additional views that in their opinion require protection.
Policy QD 6 Optimising Site Capacity	Support	<ul style="list-style-type: none"> • Astir Living Limited state their support for the policy approach. • Bellway Homes Ltd and Peabody Developments Ltd are supportive of the policy approach with some comments. • Lewisham House No.1 is broadly supportive of the policy but suggest that it clarify that the development capacities identified in the new local plan are indicative (which they are). • Tesco Stores Ltd support the policy approach.
Policy QD 6 Optimising Site Capacity	Object	<ul style="list-style-type: none"> • Artworks Creekside made detailed comments on Policy QD6 suggesting that it must include explicitly emerging contexts as part of the appraisal process in ensuring a design-led approach to be taken to optimise site capacity and establish an appropriate development density. • Landsec object to the policy – specifically in relation to their land interest, Lewisham Shopping Centre, which they consider could accommodate a higher quantum of development. • Rsidents, CA Ventures and Fifth State express broad support for the policy but seek changes to encourage higher development densities.

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		<ul style="list-style-type: none"> • Bellway Homes Ltd are broadly supportive of the policy but suggest that the text be further refined to make it clear that regard should be had to the indicative capacities. Furthermore, the indicative residential units should be considered as the minimum. • TTLP suggest that the policy goes further to identify that areas with the highest PTALs ratings in the borough are likely to be the most suitable areas for higher density development. • Home Builders Federation objects to the policy approach – they suggest that the policy is unnecessary.
Policy QD 7 Amenity and agent of change	Object	<ul style="list-style-type: none"> • GHL (Leegate) suggest that the policy be amended to take into account whether impacts of proposed development on amenity are acceptable within the physical and planning context of a site, and accounting for the wider benefits of the development and other policies
Policy QD 8 High quality housing design	Support	<ul style="list-style-type: none"> • Bellway Homes Ltd and Peabody Developments Ltd are supportive of the policy approach but also make comments relating to minor additions to the policy wording. • Bellway Homes Ltd are supportive of the policy wording but make detailed comments relating to north facing developments.
Policy QD 8 High quality housing design	Object	<ul style="list-style-type: none"> • The Renewal Group suggest that the policy wording be amended to clarify the need to optimise site capacity in line with Policy QD6 in order to comply with London Plan policy.
Policy QD 9 Building alterations, extensions, and basement development		
Policy QD 10 Infill and backland sites, garden land and amenity areas	Object	<ul style="list-style-type: none"> • Home Builders Federation objects to the policy approach – they suggest that it will militate against the supply of housing through small sites.
Policy QD 11 Shopfronts		
Policy QD 12 Outdoor advertisements, digital displays and hoardings		
Chapter 6 Heritage		

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Policy HE1 Lewisham’s Historic Environment	Support	<ul style="list-style-type: none"> • Sydenham Hill Residents support the approach to historic environments. • Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State express support for the policy.
Policy HE1 Lewisham’s Historic Environment		
Policy HE 2 Designated Heritage Assets	Object	<ul style="list-style-type: none"> • Sydenham Hill Residents object to the application of the policy approach in relation to Sydenham Hill and its ridge. • Artworks Creekside make detail comments on HE 02 – suggest that it be redrafted ton better reflect the NPPF. • Barrett London is generally supportive but suggest that Paragraph (H) should be amended as follows to ensure that there is no conflict with the National Planning Policy Framework (NPPF). • Residents, CA Ventures and Fifth State suggest that the policy is rephrased to better reflect the relevant heritage tests in the NPPF. • The GLA suggest that it may be beneficial to illustrate the entire WHS and its buffer zone in relation to Lewisham as development within the borough can still have an impact on the WHS even if located beyond the buffer zone.
Policy HE 3 Non-designated Heritage Assets	Support	<ul style="list-style-type: none"> • Support for the Bellingham Estate as an Area of Special Local Character and support for further consideration to making this a Conservation Area. • Sydenham Hill Residents provide broad support albeit that they state that Sydenham Hill should be identified as an area that is inappropriate for tall buildings.
Policy HE 3 Non-designated Heritage Assets	Object	<ul style="list-style-type: none"> • Artworks Creekside note that the assessment criteria contained within draft Policy HE3 goes beyond the test of para. 197 of the NPPF. • Landsec make a detailed objection to the policy text, with proposed changes that seek to correct a contradiction, as they perceive it. • Residents, CA Ventures and Fifth State suggest that Parts A and B of draft Policy HE3 should be redrafted to reflect Paragraph 197 of the NPPF.
Chapter 7 Housing		
Policy HO1 Meeting Lewisham’s housing needs	Support	<ul style="list-style-type: none"> • Sydenham Hill Residents support the policy approach. • Astir Living Limited broadly supports the policy but argues that their land interests can accommodate more higher intensity development (IE more housing).

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		<ul style="list-style-type: none"> • Bellway Homes Ltd and Peabody Developments Ltd fully support the policy approach. • Bellway Homes Ltd are fully supportive of the policy approach. • GHl (Leegate) support the policy but suggest that their site can accommodate more housing. • London Borough of Bexley support the policy approach. • Lewisham and Greenwich NHS Trust is broadly supportive of the policy approach – they suggest that the policy text acknowledge that the delivery of a much higher quality of housing design which can both help prevent ill health in the community and help with the recruitment and retention of public service workers. • London Borough of Bromley support the policy approach. • McCarthy Stone support the policy approach.
<p>Policy HO1 Meeting Lewisham’s housing needs</p>	<p>Object</p>	<ul style="list-style-type: none"> • Astir Living suggest that the housing % buffer be increased. • Landsec make detailed comments in relation to the mix and type of tenures being sought within the policy – specifically in relation intermediate housing products. • St Dunstan’s Educational Foundation object to the policy and seek an increase in the quantum of new homes to be delivered during the Plan period. • Vision Construct Ltd and Evelyn Court (Deptford) LLP broadly support the policy approach but suggest that Policy HO 01 F be amended to include an additional exception criterion should be added for co-location sites, where an increased provision of family accommodation may not be appropriate if industrial uses and servicing are proposed at lower levels, below residential. • SANTANDER C/O LASALLE INVESTMENT MANAGEMENT object to the policy and suggest that the local plan take a more permissive approach to new housing growth to significantly boost delivery. They also suggest that the % buffer be increased. • The Home Builders Federation object to the policy approach - they make specific comments on the plan period housing target; monitoring; meeting affordable needs; housing mix; First Home products; Studio and one bed flats; and housing choice. • The CPRE object to the policy and suggest that it include approaches that secure new green space by ensuring that that ‘infill’ schemes do not lose green space <i>per person</i>; building on estate green spaces will be resisted; if green space is lost it will be replaced and preferably

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		<p>enlarged; and that ‘grey space’ (parking / roads) on estates will be rationalised into specific locations allowing more to be converted to green space.</p> <ul style="list-style-type: none"> • The GLA note that the current London Plan period finishes before the end of the new Local Plan and consequently they appear to be objecting to the proposed approach of rolling the London Plan housing figure forward. They appear to suggest that the Plan should identify a Borough specific OAHN figure, which may be lower or higher, for that residual period pending the adoption of the next London Plan.
Policy HO2 Optimising the use of small housing sites	Support	<ul style="list-style-type: none"> • TfL support the policy approach.
Policy HO2 Optimising the use of small housing sites	Object	<ul style="list-style-type: none"> • The Home Builders Federation object to the policy approach. They make reference to the location of small site opportunities; and the delivery of small sites.
Policy HO3 Genuinely affordable housing	Support	<ul style="list-style-type: none"> • Bellway Homes Ltd and Peabody Developments Ltd are fully supportive of the policy approach. • Bellway Homes Ltd are fully supportive of the policy approach. • The GLA are broadly supportive of the policy approach but make detailed comments that appear to question the consistency between the wording of the new Local Plan and the London Plan. The GLA appear to be requesting that the new Local Plan repeat the content of the London Plan.
Policy HO3 Genuinely affordable housing	Object	<ul style="list-style-type: none"> • Detailed comment – don’t conflate intermediate products with affordable housing. • Landsec make detailed comments in relation to wording that seeks secure lifetime tenancies and consistency with London Plan wording. • The Renewal Group seek detail changes to the policy wording specifically in relation to build to rent products. • TTLP suggest that the policy be reworded to be entirely consistent with the London Plan. • The Home Builders Federation object to the policy approach because they believe that it is contrary to national policy. • Maddox Planning express broad support to the policy but object to the approach taken in respect of small sites. • Skillcrown Homes Ltd object to the approach taken in respect of small sites.

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		<ul style="list-style-type: none"> • McCarthy Stone object to the policy approach. They question the supporting evidence base, specifically in terms of viability testing of different housing typologies. They imply that their own products are not financially viable to support the delivery of genuinely affordable homes. They also object to the approach taken in relation vacant building credit. • Watkins Jones Group object to the policy approach stating that the (lack of) development viability within the build to rent sector has not been considered and that as such BTR schemes may be prejudiced.
Policy HO4 Housing estate maintenance, renewal, and regeneration	Support	<ul style="list-style-type: none"> • The GLA are broadly supportive of the policy approach – subject to some additions that seek to make the policy more-sound.
Policy HO5 Accommodation for older people	Support	<ul style="list-style-type: none"> • Astir Living provide comprehensive support to the policy approach. • London Borough of Bromley support the policy approach. • TfL is broadly support of the policy approach - subject to a minor addition that cross references the Plan’s parking policy (TR 04). • The GLA are supportive of the policy approach.
Policy HO5 Accommodation for older people	Object	<ul style="list-style-type: none"> • Home Builders Federation object to the policy because they believe that it is inconsistent with the London Plan. • McCarthy Stone object to the policy approach – specifically in relation to the provision of on-site support (however limited) as a component of accommodation for older people. They are also seeking the deletion of reference to Lewisham’s Housing Strategy.
Policy HO6 Supported and specialised accommodation	Support	<ul style="list-style-type: none"> • The GLA are supportive of the policy approach.
Policy HO7 Purpose built student accommodation	Object	<ul style="list-style-type: none"> • Landsec are broadly supportive of the policy approach but object to requirements that seek to tie new PBSA to education institutions and locate new PBSA in proximity to those institutions. • Lewisham House No.1 are broadly supportive of the policy but are seeking some detailed amendments to address what they consider to be over prescriptive requirements. • Fosfel Apollo Limited are broadly supportive of the policy but object to the requirement that proposals secure agreements between proposals and education institutions.

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		<ul style="list-style-type: none"> • Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State make detailed comments about the need to reference the London Plan’s fast track approach in relation to the provision of new PBSA. • Watkins Jones Group are broadly supportive of the policy approach but suggest that the requirement that new PBSA proposals be supported by nominations agreements with education institutes is inconsistent with the London Plan.
Policy HO8 Housing with shared facilities (Houses in Multiple Occupation)	Support	<ul style="list-style-type: none"> • Watkins Jones Group are broadly supportive of the policy but seek minor amendments to the text that clarify that 1.8 co-living units equates to the delivery of one conventional home.
Policy HO8 Housing with shared facilities (Houses in Multiple Occupation)	Object	<ul style="list-style-type: none"> • Lewisham House No.1 make a very detailed objection to the policy wording – specifically in relation to seeking clarification on the nature of evidence required to support proposals for large-scale shared accommodation.
Policy HO9 Self-build and custom-build housing		
Policy HO10 Gypsy and Traveller Accommodation	Support	<ul style="list-style-type: none"> • London Borough of Bexley support the policy. • TfL are broadly supportive of the policy approach subject to a minor amendment relating to parking provision.
Policy HO10 Gypsy and Traveller Accommodation	Object	<ul style="list-style-type: none"> • The GLA are seeking further clarity as to whether the scale of accommodation need is immediate. They are seeking an amendment that sets out a ten-year pitch requirement.
Chapter 8 Economy and Culture		
Policy EC1 A thriving and inclusive local economy	Support	<ul style="list-style-type: none"> • Artworks Creekside support the policy approach.
Policy EC2 Protecting employment land and delivering new workspace	Support	<ul style="list-style-type: none"> • Support from Big Yellow Box • Artworks Creekside support the policy approach. • Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State express support to the policy. • Frank Griffiths supports the policy approach. • London Borough of Bexley support the policy approach.
Policy EC2 Protecting employment land and delivering new workspace	Object	<ul style="list-style-type: none"> • Resident objecting to loss of employment provision in Deptford, Bellingham, and Bell Green • Lewisham House No.1 make a detailed objection to the policy wording and content. Specifically in relation to amending Part B to include a subpoint supporting change of use to

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		<p>provide employment floorspace in appropriate locations; and providing additional clarity as to how Policy EC 02 interacts with Policy LCA 02 J.</p> <ul style="list-style-type: none"> • Vision Construct Ltd and Evelyn Court (Deptford) LLP object to the policy approach as they believe that it may result in many schemes being undeliverable or having a significant reduction in other planning benefits. • The Arch Company suggest that the designation of the Bermondsey Dive Under site be revised to a single unified LSIS designation rather than the current split. • The GLA object to the policy approach and state that this is a matter of general conformity. Their specific concerns are in relation to ensuring a sufficient supply of strategic industrial land, to meet needs, over the plan period. Their position is based on a recently published high-level assessment of strategic industrial land. The implication is that the previously identified SIL surplus has now been “used” up and that the Borough has a deficit in provision. They are suggesting that the new Local Plan be amended to include a clear baseline position that need can be planned, monitored, and managed. The GLA appear to imply that the allocation of the BDU site and the redesignation of committed sites (through redevelopment) as LSIS is unsound.
Policy EC3 High quality employment areas and workspace	Support	<ul style="list-style-type: none"> • Artworks Creekside support the policy approach.
Policy EC3 High quality employment areas and workspace	Object	<ul style="list-style-type: none"> • Landsec object to detailed aspects of this policy – specifically in relation to consistency with the London Plan. • Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State express broad support for the policy but suggest that it be provided with amended wording that provides a greater degree of flexibility, noting that all tenants may not seek prior internal fit out beyond shell and core. • SEGRO PLC object to the policy stating that it sets a low floorspace threshold for the provision of smaller employment units and is potentially problematic for SMEs looking for floorspace of c. 2,500 sqm.
Policy EC4 Low-cost and affordable workspace	Support	<ul style="list-style-type: none"> • Artworks Creekside support the policy approach. • Bellway Homes Ltd and Peabody Developments Ltd are supportive of the policy approach subjective to cross reference to viability.

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		<ul style="list-style-type: none"> • Bellway Homes Ltd is supportive of the policy (subject to development viability).
Policy EC4 Low-cost and affordable workspace	Object	<ul style="list-style-type: none"> • Landsec object to detailed policy wording and seek the inclusion of new text that places an enhanced emphasis upon development viability assessment. • Fosfel Apollo Limited broadly support the policy but recommended that the policy is amended to reflect the scale of development, commercial floorspace thresholds and other site-specific considerations. • The Renewal Group object on the basis that they consider it inappropriate to require that B8 and sui generis floorspace should contribute to the 10% low-cost requirement given the economic scale of B8 space and the use types covered by Use Class sui generis set out in the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. • Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State express strong support for the provision of affordable workspace but seek amendments that provide further detail to provide decision-takers further flexibility to consider additional evidence on development viability. • SEGRO PLC object to the policy stating that it should provide sufficient evidence to justify affordable workspace requirements in relation to B2 and B8 uses. • Howard Lewisham Ltd object to the policy – suggesting that it is inconsistent with the London Plan; riding roughshod over the established approach. They suggest that SILs be excluded from the approach, with further comments in older accommodation; calculation of off-site contributions; duration of provision; and meantime uses.
Policy EC5 Strategic Industrial Locations (SIL)	Support	<ul style="list-style-type: none"> • Resident expresses support for approach to SIL. • SEGRO PLC express support for the policy approach to SIL. • Frank Griffiths supports the policy approach. • Howard Lewisham Ltd make a neutral statement on this policy – but do not appear to question its soundness.
Policy EC5 Strategic Industrial Locations (SIL)	Object	<ul style="list-style-type: none"> • The GLA object to the policy approach. They suggest that the proposed allocation of the BDU site and redesignation of three sites as LSIS will result in an under-provision of Strategic Industrial Locations. Their assumption being based on their interpretation of data from a recently published high-level study. They appear to suggest that the BDU site needs to meet

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		all the operational requirements set out in the London Plan. Their representation makes an erroneous statement in relation to Mercury Way.
Policy EC6 Locally Significant Industrial Sites (LSIS)	Support	<ul style="list-style-type: none"> • Support from Big Yellow Box. • Fosfel Apollo Limited support the approach to SIL.
Policy EC6 Locally Significant Industrial Sites (LSIS)	Object	<ul style="list-style-type: none"> • Artworks Creekside suggest that detailed elements of the policy are inconsistent with detailed elements of Policy EC 02. This includes specific comments to master planning and genuinely affordable housing. • Vision Construct Ltd and Evelyn Court (Deptford) LLP object to the detailed wording of the policy. They suggest part E of the policy should be written so that if any of the individual criterion (a) to (d) of this part of the policy are met then a net loss in industrial capacity is considered reasonable. • Residents, CA Ventures and Fifth State express broad support for the policy but suggest that the application of the master planning approach is not necessary on allocated sites. • The GLA object to the policy approach as part of their wider objection relating to the provision of strategic industrial land. Again, this appears to be based upon their understanding and conclusions from a recently published high-level assessment of provision and demand. The GLA appear to be suggesting that LSIS should not be promoted for office uses.
Policy EC7 Mixed-use Employment Locations (MEL)	Object	<ul style="list-style-type: none"> • Bellway Homes Ltd and Peabody Developments Ltd express broad support for the policy relating to MELs. However, they also make detailed comments in relation to consistency with the London Plan. • HPG object to the policy approach – suggesting that greater flexibility be provided to allow MELs to divest themselves of industrial uses when there is no longer any demand. Their representation is specifically related to the Convoys Wharf site. • The Renewal Group suggest that the policy be amended to be consistent with the London Plan and PD regime. • Bellway Homes Ltd are broadly supportive of the policy but make detailed comments about the potential to secure regeneration through housing development and the suggestion that MELs should not provide long-term protection for industrial sites if there is no demand.

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		<ul style="list-style-type: none"> The GLA suggest that MELs are ‘non-designated industrial sites’ and as such London Plan Policy E7C is relevant. This makes it clear that mixed-use or residential development proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes, or it has been allocated in an adopted local Development Plan Document for industrial, storage or distribution floorspace and is provided as part of mixed-use intensification. In light of this the approach for MELs should be amended accordingly.
Policy EC8 Non-designated employment sites	Support	<ul style="list-style-type: none"> Support from Big Yellow Box Bell Green Neighbourhood Group and Julia Webb (resident) broadly support the application being made for a Bell Green Cultural Quarter. They make further comments in relation to Bell Green Gas Holders and Livesey Memorial Hall.
Policy EC9 Railway arches	Support	<ul style="list-style-type: none"> TTLP support the policy approach. TfL are broadly supportive of the policy approach subject to a minor amendment that relates to the delivery of the BLE.
Policy EC9 Railway arches	Object	<ul style="list-style-type: none"> The Arch Company make detailed objecting comments to specific subsections of Policy EC 09. These relate to viability, accessibility and engagement with infrastructure partners.
Policy EC10 Workplace training and job opportunities	Object	<ul style="list-style-type: none"> Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State suggest that the policy be modified to provide further flexibility and specifically to allow developers to provide some form of on-site social value that serves to provide an alternative “payment in kind”.
Policy EC11 Town centres at the heart of our communities	Support	<ul style="list-style-type: none"> Astir Living provide comprehensive support to the policy approach. Barrett London is supportive of the policy approach. Landsec support the policy approach. Historic England support the policy approach – subject to an addition that cross references to the relevant heritage policies.
Policy EC11 Town centres at the heart of our communities	Object	<ul style="list-style-type: none"> The Renewal Group suggest that the policy be revised to be consistent with the PD regime.
Policy EC12 Town centre network and hierarchy	Support	<ul style="list-style-type: none"> GHL (Leegate) support the policy approach.

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Policy EC12 Town centre network and hierarchy	Object	<ul style="list-style-type: none"> • Landsec appear to challenge some aspects of the new Local Plan’s retail evidence specifically in terms of Lewisham Town Centres trading and the probability of Lewisham Town Centre being raised to Metropolitan Centre status. • The Renewal Group suggest that the policy be revised to be consistent with the PD regime. • The GLA suggests that the new Local Plan should recognise and understand that the London Plan identifies offices as a town centre use which is set out clearly in Policy SD7A and this should be reflected in the draft Plan accordingly. The GLA also suggest that beyond quantitative aspects, it will be important for the new Local Plan to promote a broad mix of diverse uses. Consequently, the new Local Plan should put in place a town centre strategy to demonstrate how the borough will support a transformation away from car-based travel while exploring the potential for residential mixed-use opportunities within any existing retail parks within the borough.
Policy EC13 Optimising the use of town centre land and floorspace	Support	<ul style="list-style-type: none"> • Astir Living provide comprehensive support to the policy approach. • Lewisham House No.1 support the policy. • GHl (Leegate) support the policy approach.
Policy EC13 Optimising the use of town centre land and floorspace	Object	<ul style="list-style-type: none"> • Landsec make a detailed objection to Policy EC 13 B – suggesting some amendments to the text. • Tesco Stores Ltd broadly support the policy but suggest that text to be added to the draft policy supporting greater optimisation in town centre locations with the greatest PTAL locations (5, 6a or 6b) such as Lewisham Town Centre. • The Renewal Group suggest that the policy be revised to be consistent with the PD regime.
Policy EC14 Major and District Centres	Object	<ul style="list-style-type: none"> • Landsec seek a comprehensive amendment or deletion of Policy EC 14 – in order to allow for a more permissive environment on their land interest, Lewisham Shopping Centre. • The Renewal Group suggest that the policy be revised to be consistent with the PD regime. • GHl (Leegate) suggest that the requirement for a ‘Shopping Area Impact Assessment’ limits future opportunity for Primary Shopping Areas and challenges the flexibility afforded by Class E. They also state that conversion of ground floor retail units, located within primary retail areas, to residential is acceptable.
Policy EC15 Local Centres	Object	<ul style="list-style-type: none"> • The Renewal Group suggest that the policy be revised to be consistent with the PD regime.

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Policy EC16 Shopping parades, corner shops and other service points	Object	<ul style="list-style-type: none"> The Renewal Group suggest that the policy be revised to be consistent with the PD regime.
Policy EC17 Concentration of uses	Object	<ul style="list-style-type: none"> The Renewal Group suggest that the policy be revised to be consistent with the PD regime.
Policy EC18 Culture, creative industries and the night-time economy	Support	<ul style="list-style-type: none"> Resident provides broad support for proposal for a Bell Green Cultural Quarter. Bell Green Neighbourhood Group provides broad support for proposal for a Bell Green Cultural Quarter. Residents, CA Ventures and Fifth State support the policy approach. The GLA are broadly supportive of the policy approach and specifically note that the plan is consistent with the London Plan. However, the GLA suggest that the plan go further and explore the benefits of diversifying the night-time mix of uses.
Policy EC18 Culture, creative industries and the night-time economy	Object	<ul style="list-style-type: none"> The Renewal Group seek revisions to the policy to ensure, in their opinion, that it does not conflict with the strategic objectives of the plan. Their comments focus upon the current market conditions and viability; and the potential use of meanwhile uses.
Policy EC19 Public Houses	Support	<ul style="list-style-type: none"> Artworks Creekside support the policy in broad principle but object to some aspects of the detailed supporting text. Their interest is in relation to the Birds Nest Public House.
Policy EC19 Public Houses	Object	<ul style="list-style-type: none"> GHL (Leegate) suggest that the policy is overly restricted and should be amended to allow for an appropriate level or re-provision rather than a like-for-like development scale. Anerley Estate object to the policy on the grounds that it is inconsistent with the London Plan and that the pub market is in state of transition; and that the three year marketing period is consequently too onerous.
Policy EC20 Markets		
Policy EC21 Visitor Accommodation	Support	<ul style="list-style-type: none"> Astir Living provide comprehensive support to the policy approach.
Chapter 9 Community Infrastructure		
Policy CI1 Safeguarding and securing community infrastructure	Support	<ul style="list-style-type: none"> NHS Property Services Ltd express broad support for the policy approach. London Borough of Bromley supports the policy approach.

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Policy CI1 Safeguarding and securing community infrastructure	Object	<ul style="list-style-type: none"> • The Renewal Group suggest that the policy needs to make clear that it does not seek to protect short-term meanwhile uses. As drafted, the policy could adversely impact the delivery of the plan and there is no justification in the supporting evidence base for the retention of short-term or meanwhile uses. • Lewisham and Greenwich NHS Trust are broadly supportive of the policy approach but suggest that the Plan should show how the policies will help to ensure that the social, objectives of sustainability will be achieved. Specifically, the supporting policy text makes reference to supporting the Lewisham University Hospital in the aims of LC for infrastructure delivery. • HUDU object to the policy wording – they suggest that it be expanded to encompass “social and community infrastructure”.
Policy CI2 High quality community infrastructure	Support	<ul style="list-style-type: none"> • Lewisham and Greenwich NHS Trust support the policy approach.
Policy CI3 Sports, recreation and play	Object	<ul style="list-style-type: none"> • Landsec object to the policy and seek amendments that allow for multi-level provision – primarily to benefit their land interest at Lewisham Shopping Centre. • St Dunstan’s Educational Foundation seek amendments to the policy wording primarily to benefit the development of their land interest for housing. • McCarthy Stone object to the policy approach as they state that old people do not need open space provision.
Policy CI4 Nurseries and childcare facilities		
Policy CI5 Nurseries and childcare facilities		
Chapter 10 Green Infrastructure		
Policy GR1 Green infrastructure and Lewisham’s Green Grid	Support	<ul style="list-style-type: none"> • The Environment Agency support this policy • The GLA support the policy approach.
Policy GR1 Green infrastructure and Lewisham’s Green Grid	Object	<ul style="list-style-type: none"> • Resident suggests that the potential for net loss of green space is a concern.

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Policy GR2 Open Space	Support	<ul style="list-style-type: none"> • The Environment Agency support this policy • TfL are broadly supportive of the policy approach subject to the introduction of text relating to the delivery of the BLE. • The GLA are broadly supportive of the policy approach but suggest that the Council consider designating Local Green Spaces as MOL.
Policy GR2 Open Space	Object	<ul style="list-style-type: none"> • Detail objection - Local Green Space and Metropolitan Open Land needs to be designated at Courtrai Road in Crofton Park and along the railway cuttings from Forest Hill, Honor Oak Park through to New Cross Gate. • AA Homes & Housing object to the identification of land bounded by Courtrai Road, Eddystone Road, rear boundaries of properties in Buckthorne Road and the New Cross to Forest Hill railway cutting in Crofton Park as Metropolitan Open Land. • The CPRE are broadly supportive of the policy approach but state that it must be revised to emphasise provision of green space per person so there is genuinely ‘no net loss’ • The CPRE also state that the remaining parcel of land to the south of Glass Mill Leisure Centre should be retained as MOL as this is now the only green space in this highly built-up area. They also object to the amendment of the MOL to accommodate improvements to the South Circular Road. They also propose comprehensive designation of new Local Green Spaces across the Borough. • Fourth Reserve Foundation seek the inclusion of the Gorne Wood as part of the Buckthorne Cutting Nature Reserve.
Policy GR3 Biodiversity and access to nature	Support	<ul style="list-style-type: none"> • The Environment Agency support this policy
Policy GR3 Biodiversity and access to nature	Object	<ul style="list-style-type: none"> • Sainsbury’s Supermarkets Ltd suggest that securing on-site biodiversity net gain on site is too aspirational and that detailed amendments be made to the policy text to clarify this position.
Policy GR4 Lewisham Links	Support	<ul style="list-style-type: none"> • The Environment Agency support this policy.
Policy GR5 Urban Greening and Trees	Support	<ul style="list-style-type: none"> • The Environment support this policy.
Policy GR5 Urban Greening and Trees	Object	<ul style="list-style-type: none"> • Resident suggests that the value of mature trees is not sufficiently reflected in the policy.

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		<ul style="list-style-type: none"> • SEGRO PLC object to the policy stating that it should clarify their position on employment developments which cannot deliver a sufficient UGF score. The policy should also acknowledge the potential structural, financial, and environmental issues associated with green roofs and walls in relation to employment buildings.
Policy GR6 Food Growing	Support	<ul style="list-style-type: none"> • The Environment Agency support this policy.
Policy GR7 Geodiversity	Support	<ul style="list-style-type: none"> • The Environment Agency support this policy.
Chapter 11 Sustainable Design and Infrastructure		
Policy SD1 Responding to the climate emergency	Support	<ul style="list-style-type: none"> • Astir Living provide comprehensive support to the policy approach. • The Environment Agency support this policy. • The GLA support the policy approach and state that it is consistent with the London Plan. They also note that the Mayor has, outside of the plan-making, suggested a more ambitious carbon neutral target for London.
Policy SD2 Sustainable design and retrofitting	Support	<ul style="list-style-type: none"> • Artworks Creekside support the policy approach. • Lewisham House No.1 support the policy approach. • Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State support the policy. • The Environment Agency support this policy. • Lewisham and Greenwich NHS Trust are broadly supportive of the policy approach – subject to development viability. • Historic England are broadly supportive of the policy approach subject to additions stating that historic buildings may often need bespoke or non-standard interventions to reduce energy consumption and carbon emissions, as well as signposting current Historic England guidance.
Policy SD2 Sustainable design and retrofitting	Object	<ul style="list-style-type: none"> • Barrett London is broadly supportive of the policy but request the policy be amended to clarify that the excellent rating is a ‘target’ rather than a fixed policy requirement. • Sainsbury’s Supermarkets Ltd seek a detailed addition to the policy in relation to foodstores achieving BREEAM very good.
Policy SD3 Minimising greenhouse gas emissions	Support	<ul style="list-style-type: none"> • The Environment Agency support this policy.
Policy SD3 Minimising greenhouse gas emissions	Object	<ul style="list-style-type: none"> • SEGRO PLC object to the policy stating that requiring WLC assessments of all major developments will mean that developers face unnecessary financial costs and timescales.

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		<p>The policy should follow the wording of the London Plan and limit this requirement to referred applications.</p> <ul style="list-style-type: none"> • McCarthy Stone object to the policy. They suggest that their products are not sufficiently viable to meet the requirements to minimise greenhouse gas emissions.
Policy SD4 Energy Infrastructure	Support	<ul style="list-style-type: none"> • The Environment Agency support this policy. • London Borough of Bromley support the policy approach.
Policy SD5 Managing Heat Risk	Support	<ul style="list-style-type: none"> • The Environment Agency support this policy.
Policy SD6 Improving Air Quality	Support	<ul style="list-style-type: none"> • The Environment Agency support this policy. • Lewisham and Greenwich NHS Trust support this policy • TfL is broadly supportive of the policy approach but is seeking detailed additions that make reference to specific aspects of air quality • The GLA is broadly supportive of the policy approach but suggests slavishly regurgitating the content of the London Plan.
Policy SD7 Minimising and managing flood risk	Support	<ul style="list-style-type: none"> • The Environment Agency support this policy.
Policy SD8 Sustainable Drainage	Support	<ul style="list-style-type: none"> • The Environment Agency support this policy. • Thames Water support the site allocation – subject to additions to the supporting text.
Policy SD9 Lewisham’s Waterways	Support	<ul style="list-style-type: none"> • Bellway Homes Ltd and Peabody Developments Ltd are supportive of the policy but comment that the supporting text is overly prescriptive and may stifle redevelopment. • Bellway Homes Ltd are supportive of the policy but make detailed comments about development facilitating waterborne transport. • The Environment Agency support this policy. • The GLA support the policy approach.
Policy SD10 Water Supply and wastewater	Support	<ul style="list-style-type: none"> • The Environment Agency support this policy. • Thames Water support the site allocation – subject to additions to the supporting text.
Policy SD10 Water Supply and wastewater	Object	<ul style="list-style-type: none"> • The Home Builders Federation object to the policy on the basis that it requires developers to provide products that integrate with external infrastructure networks.
Policy SD11 Ground Conditions	Support	<ul style="list-style-type: none"> • The Environment Agency support this policy.

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Policy SD12 Reducing and sustainably managing waste	Support	<ul style="list-style-type: none"> • The Environment Agency support this policy. • London Borough of Bexley support the policy approach subject to reference to the SELJWPG. • City of Westminster are broadly supportive of the policy approach.
Policy SD13 Design to support the circular economy	Support	<ul style="list-style-type: none"> • The Environment Agency support this policy.
Policy SD13 Design to support the circular economy	Object	<ul style="list-style-type: none"> • SEGRO PLC object to the policy stating that as with Policy SD3, this policy should be reworded so that net-zero waste is a requirement of referred applications, instead of all major applications.
Chapter 12 Transport and Connectivity		
Policy TR1 Sustainable transport and movement	Support	<ul style="list-style-type: none"> • TfL are supportive of the policy approach but have made very detailed comments in relation to the BLE – specifically in relation to the definition and legal status of the safeguarding directions made in relation to the BLE. • The GLA support the policy approach – specifically in relation to the delivery of the improvements to the South Circular Road at Catford.
Policy TR1 Sustainable transport and movement	Object	<ul style="list-style-type: none"> • General objection relating to aspects of proposed Surrey Canal Road Station. • TTLP suggest that the spatial strategy be expanded to allow growth beyond the identified growth centres, nodes, and corridors in other places with good access to transport networks. • St Dunstan’s Educational Foundation object to the policy in relation to the South Circular Road realignment (in Catford Town Centre) – specifically in relation to releasing more land from the MOL to allow for housing development on their land interest. • TTLP suggest that the policy be reworded to require that development proposals must consider Public Transport Access Levels (PTAL) to optimise the capacity of sites. • Network Rail suggest that the plan clarify what is meant by the term metro-isation. • Lewisham and Greenwich NHS Trust are broadly supportive of the policy approach but seek minor amendments that make explicit reference to access to healthcare.
Policy TR2 Bakerloo Line Extension	Support	<ul style="list-style-type: none"> • Network Rail note this feature throughout the plan as a key enabler of high-density development, which Network Rail supports as it releases significant capacity of the Southeastern and Thameslink network.

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		<ul style="list-style-type: none"> London Borough of Bromley is supportive of the policy approach. TfL are supportive of the policy approach but have made very detailed comments in relation to the BLE – specifically in relation to the definition and legal status of the safeguarding directions made in relation to the BLE.
Policy TR3 Healthy streets as part of healthy neighbourhoods	Support	<ul style="list-style-type: none"> Lewisham and Greenwich NHS Trust are supportive of the policy approach. TfL are broadly supportive of the policy approach – subject to the introduction of references to LTN schemes.
Policy TR3 Healthy streets as part of healthy neighbourhoods	Object	<ul style="list-style-type: none"> The CPRE object to the policy and suggest that it be amended to include an approach that secures new open space through the re-allocation of kerbside space for either public realm or open space provision; and that a specific percentage target be set by the new Local Plan.
Policy TR4 Parking	Support	<ul style="list-style-type: none"> TfL express broad support for the policy approach. They state that this approach to prioritising car-free and car-lite development is in accordance with policy T6 (Car parking) of the London Plan and is supported. TfL are seeking additions to the policy and supporting text that makes more explicit reference to minimising parking provision.
Policy TR4 Parking	Object	<ul style="list-style-type: none"> Resident objects to the introduction of new CPZs on Telegraph Hill. Astir Living object to Policy TR4, Part C, which states that development proposals should not exceed the maximum car parking standards as set out in the London Plan for retail uses. Tesco Stores Ltd object to the parking policy approach – primarily because they wish to retain at least the same level of provision at their Lewisham Town centre store. HPG object to the approach to car parking provision – specifically in relation to the scale of provision to be delivered for the Convoys Wharf site.
Policy TR5 Deliveries, servicing and construction	Support	<ul style="list-style-type: none"> TfL express support for the policy approach.
Policy TR6 Taxis and private hire vehicles	Support	<ul style="list-style-type: none"> TfL support the policy approach – subject to a minor addition/ amendment.
Policy TR7 Digital Connectivity	Support	<ul style="list-style-type: none"> TfL support the policy approach – subject to a minor correcting addition/ amendment.
Part Three Lewisham’s Neighbourhoods and Places		
Chapter 13 Lewisham’s Neighbourhoods and Places		
Paragraphs 13.7 – 13.8	Object	<ul style="list-style-type: none"> The GLA state that although potential growth is welcomed, it is less clear what the borough’s growth needs are over the life of the Plan. Only then can we understand how the

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		strategic approach is able to contribute towards meeting those needs. The Plan period starts in 2020 and runs until 2040.
Table 13.1	Object	<ul style="list-style-type: none"> The GLA state that the employment figures would further benefit by being divided into their indicative component growth figures for Class E and Class B uses. Given the breadth of Class E uses, consideration could be given to where these might be appropriately located e.g., town centres, designated industrial land.
Site Allocations – General	Object	<ul style="list-style-type: none"> The GLA state that setting out proposals for ‘employment use’ for some allocations risks the loss of valuable industrial capacity to speculative proposals for office development. Office development should be directed to the borough’s town centres while industrial capacity should be focused on the borough’s designated and non-designated industrial areas. The site allocations should therefore include separate categories for indicative capacities for office and for industrial proposals.
Chapter 14 Lewisham’s Central Area		
LCA	Support	<ul style="list-style-type: none"> Frank Griffiths supports the policy approach set out under LCA; specifically in relation to Randlesdown Road SIL.
LCA	Object	<ul style="list-style-type: none"> Lewisham and Greenwich NHS Trust is broadly supportive of the policy wording but seeks additions to the text that highlight the importance of healthcare facilities to place-making within Lewisham Central Area.
LCA - Big Yellow Storage, 155 Lewisham Way, London SE14 6QP and Wearside Depot, Wearside Road, London SE13 7EZ	Alternative/ Omission site	<ul style="list-style-type: none"> TfL state these sites are not identified as site allocations but are critical for the delivery of the BLE. The formal safeguarding directions will give a degree of protection to the sites and future development. However, identifying future uses of the sites through a site allocation in the local plan, including for BLE infrastructure would best protect the interests of the BLE, and new London Underground services to Lewisham.
Policy LCA1 Central Area place principles	Support	<ul style="list-style-type: none"> Astir Living support Policies LCA1 (Central Area Place Principles) and LCA2 (Lewisham Major Centre and Surrounds) and their recognition of Lewisham Town Centre being a “<i>Major Centre</i>” and “<i>Regeneration Node</i>”, as is seen at ‘Figure 14.2: Central Area key diagram’ Tesco Stores Ltd support the policy approach. TTLP supports the policy approach.
Policy LCA1 Central Area place principles	Object	<ul style="list-style-type: none"> Culverley Green Residents Association object specifically in relation to proposed building heights and consequential development quantum.

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Policy LCA2 Lewisham major centre and surrounds	Support	<ul style="list-style-type: none"> • Astir Living support Policies LCA1 (Central Area Place Principles) and LCA2 (Lewisham Major Centre and Surrounds) and their recognition of Lewisham Town Centre being a “Major Centre” and “Regeneration Node”, as is seen at ‘Figure 14.2: Central Area key diagram’ • Tesco Stores Ltd support the policy approach.
Policy LCA2 Lewisham major centre and surrounds	Object	<ul style="list-style-type: none"> • Landsec object to the policy and suggest that it conflicts with Policy EC 08. They suggest that LCA 02 J is inflexible and should be deleted. They also object to the suggestion that Lewisham Shopping Centre requires comprehensive redevelopment; question whether the Town Centre can achieve Metropolitan Centre status; and suggest that their land interest could accommodate a higher quantum of development with a different mix of uses. • Lewisham House No.1 broadly support the policy but seek its amendment to allow a more permissive regime for ground floor uses within primary retail areas – fundamentally that allows ground floor residential uses (within primary retail frontages).
Policy LCA3 Catford major centre and surrounds		
Policy LCA4 A21 Corridor	Support	<ul style="list-style-type: none"> • Frank Griffiths supports the policy approach. • Lewisham and Greenwich NHS Trust support the policy approach.
Policy LCA4 A21 Corridor	Object	<ul style="list-style-type: none"> • Culverley Green Residents Association object specifically in relation to proposed building heights and consequential development quantum.
Lewisham Central Area Site Allocations		
Policy LCA SA 01 Lewisham Gateway	Support	<ul style="list-style-type: none"> • TTLP is supportive of the site allocation. • Thames Water support the site allocation subject to some additions to the policy wording to ensure meaningful engagement between developers and Thames Water.
Policy LCA SA 01 Lewisham Gateway	Object	<ul style="list-style-type: none"> • TfL suggest that the policy and supporting text be amended to include explicit reference to cycle parking and seek a reduction in car parking provision across the site, with the objective of improving air quality.
Policy LCA SA 02 Lewisham Shopping Centre	Support	<ul style="list-style-type: none"> • Thames Water support the site allocation.
Policy LCA SA 02 Lewisham Shopping Centre	Object	<ul style="list-style-type: none"> • Landsec broadly support the allocation but have detailed objections that relate to the quantum, capacity and mix of uses proposed for the comprehensive mixed-use redevelopment of the site.

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		<ul style="list-style-type: none"> Lewisham House No.1 supports the allocation but objects to the requirements for master planning and landowners working collegiately to achieve shared objectives. They also object to the identification of indicative capacities – suggesting that their site can accommodate more.
Policy LCA SA 03 Land at Engate Street	Support	<ul style="list-style-type: none"> Thames Water support the site allocation.
Policy LCA SA 04 Conington Roa		
Policy LCA SA 05 Land at Conington Road and Lewisham Road (Tesco)	Support	<ul style="list-style-type: none"> TTLP are supportive of the site allocation but also suggest that the policy recognise that on-site bus stop provision be relocated or retained. Thames Water supports the site allocation. TfL are supportive of the policy approach towards this site allocation.
Policy LCA SA 05 Land at Conington Road and Lewisham Road (Tesco)	Object	<ul style="list-style-type: none"> Astir Living support the allocation but object to the indicative development quantum identified for the site – they believe that they can deliver more. They also speak to the reprovision of the Tesco store and bus stops and the definition of the site as a transitional location. Tesco Stores Ltd support the allocation but object to the indicative development quantum identified for the site – they believe that they can deliver more. They also speak to the reprovision of the Tesco store, bus stops, sustainable travel, and the definition of the site as a transitional location.
Policy LCA SA 06 Thurston Road Bus Station	Support	<ul style="list-style-type: none"> Thames Water support the site allocation.
Policy LCA SA 06 Thurston Road Bus Station	Object	<ul style="list-style-type: none"> TTLP are broadly supportive of the site allocation but suggests that it be amended to include the flexibility to deliver residential development above the transport infrastructure. They also suggest that the plan identifies and commits to potential alternative sites which could accommodate a future bus stand within the locality of the Gateway. TfL recommend that the local plan identifies and commits to potential alternative sites which could accommodate a future bus stand within the locality of the Gateway.

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Policy LCA SA 07 Lewisham Retail Park, Loampit Vale	Support	<ul style="list-style-type: none"> • Legal & General (L&G) support the policy approach, specifically in relation to the identification of the site being appropriate for tall buildings. The supporting representation suggest some additions to the policy text to provide clarity. • Thames Water support the site allocation. • TfL are supportive of the site allocation.
Policy LCA SA 08 100-114 Loampit Vale	Support	<ul style="list-style-type: none"> • Thames Water support the site allocation.
Policy LCA SA 08 100-114 Loampit Vale	Object	<ul style="list-style-type: none"> • The GLA appear to be objecting to the mix of uses proposed for the site. They state that mixed-use or residential proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes, or it has been allocated in an adopted Local Plan or industrial, storage or distribution floorspace is provided as part of mixed-use intensification.
Policy LCA SA 09 Silver Road and Axion House	Support	<ul style="list-style-type: none"> • Thames Water support the site allocation subject to some additions to the policy wording to ensure meaningful engagement between developers and Thames Water.
Policy LCA SA 10 House on the Hill at Slaithwaite Road	Support	<ul style="list-style-type: none"> • Thames Water support the site allocation.
Policy LCA SA 10 House on the Hill at Slaithwaite Road	Object	<ul style="list-style-type: none"> • Resident objects to the proposed scale/ quantum of development and the possible impact on the amenity on surrounding residential uses. • The CPRE state that mature Trees and green space should be retained. • Resident objects to the site allocation on the grounds of quantum of development and impact on the residential amenity of the surrounding area (parking). • Resident objects on the grounds that redevelopment will result in the loss of parking provision. • Resident objects on the grounds of scale/ quantum of development and the possible adverse impacts of tall new buildings. • Resident object to the site allocation on the grounds of impact on neighbouring amenity; possible subsidence (caused by construction); and capacity of local utility infrastructure networks.

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		<ul style="list-style-type: none"> • Resident objects stating that House on the Hill should remain a community building and keep its existing gardens and size. It is a quiet area, close to the centre and should be kept this way. • Resident objects on the basis that the redevelopment will result in an increased density of development – possibly inclusive of taller buildings. • A resident expressed concern about the possible density and height of any future developments on this site allocation. • A resident objects to the site allocation on the grounds that it will result in the loss of an existing community facility; result in too high an intensity of housing development; will be too high; have a consequential impact on the residential amenity of the surrounding area; and that there is not sufficient capacity within local infrastructure networks to accommodate the redevelopment. • A resident objects to the site allocation on the grounds that the redevelopment will be too high; result in loss of provision for vulnerable people; and fail to provide sufficient parking provision for future residents. • A resident objects to the site allocation on the grounds that it will result in an adverse impact upon air quality; loss of/ inadequate provision of green space; insufficient capacity in local infrastructure networks; building height/ new development too tall; and a consequential impact on the residential amenity of the surrounding area (particularly during construction). • A resident objects to the site allocation on the grounds that it will result in too intense a development; too tall a building that will be prominent within the wider townscape; and have an adverse impact on the existing LTN (due to an assumed increase in traffic volume). The resident also questioned the need for the Borough’s “high” housing target. • A resident objects to the site allocation on the grounds that it will result in a loss of green space; adversely impact upon local wildlife and habitats; result in an overly intense development – too many new homes; and have a consequential impact on the residential amenity of the surrounding area (particularly during construction).
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		<ul style="list-style-type: none"> • A resident objects to the site allocation on the grounds that it will have an impact on air quality; increase in traffic volumes; the residential amenity of existing residents; and potential subsidence of the surrounding area. • A resident objects to the site allocation on the grounds that the proposed number of new homes is too high; that redevelopment will result in increasing traffic volumes; there is insufficient capacity within local infrastructure networks; and that there will be adverse consequential impacts on the residential amenity of the surrounding area. • A resident objects to the site allocation on the grounds that the proposed number of new homes is too high; that redevelopment will result in increasing traffic volumes; there is insufficient capacity within local infrastructure networks; and that there will be adverse consequential impacts on the residential amenity of the surrounding area. • A resident objects to the site allocation on the grounds that the proposed number of new homes is too high; that redevelopment will result in increasing traffic volumes; there is insufficient capacity within local infrastructure networks; and that there will be adverse consequential impacts on the residential amenity of the surrounding area. • A resident objects to the site allocation on the grounds that it is of an intensity/ density that is inappropriate for the area; it will result in the loss of an existing community asset; that the number of new homes proposed is too high; that it will have an adverse impact on the residential amenity of the surrounding area; have an adverse impact on traffic – increasing volume; and that there is insufficient local infrastructure network capacity to accommodate the development. The resident also commented that the consultation/ engagement process did not meet their expectations. • A resident objects to the site allocation on the grounds that it is of an intensity/ density that is inappropriate for the area; it will result in the loss of an existing community asset; that the number of new homes proposed is too high; that it will have an adverse impact on the residential amenity of the surrounding area; have an adverse impact on traffic – increasing volume; and that there is insufficient local infrastructure network capacity to accommodate the development. The resident also commented that the consultation/ engagement process did not meet their expectations.
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		<ul style="list-style-type: none"> • A resident objects to the site allocation on the grounds that it will result in an over-development of the site – the proposed quantum of new homes and potential building height are considered too excessive for the area. The resident also notes that the possible consequential increases in traffic volumes will have an adverse impact – they suggest that the site come forward as a car free development. • A resident objects to the site allocation on the grounds that it will result in an over-development of the site – the proposed quantum of new homes and potential building height are considered too excessive for the area. The resident also notes that the possible consequential increases in traffic volumes will have an adverse impact. • A resident objects to the site allocation on the grounds that it will result in an over-development of the site – the proposed quantum of new homes and potential building height are considered too excessive for the area; and that there is insufficient local infrastructure network capacity to accommodate the development. The resident also notes that the possible consequential increases in traffic volumes will have an adverse impact. • A resident objects to the site allocation on the basis that it will result in the loss of an existing valued use (that caters for vulnerable people); and result in the loss of trees. The resident sets out how they consider the site should be redeveloped – high quality design; appropriate quality landscaping; that the new development continues to be focused on providing community benefit and that existing trees are maintained. • A resident objects to the site allocation on the grounds that it will have an adverse impact on the residential amenity of the surrounding area; and place additional pressure on local infrastructure networks. • A resident objects to the site allocation on the basis that it will result in the loss of an existing community facility; result in too intense a development/ comprised of too many new homes; have an adverse impact on the residential amenity enjoyed by the surrounding area; and place additional pressure on local infrastructure networks. • A resident objects to the site allocation on the basis that it will result in too tall a new building; impact on the residential amenity enjoyed by the surrounding area; and increase traffic and parking volumes.
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		<ul style="list-style-type: none"> • A resident objects to the site allocation on the basis that the resulting tall building will have an adverse impact on the visual character and appearance of the surrounding townscape; and result in the loss of a valued community facility. • A resident objects to the site allocation on the basis that the resulting tall building will have an adverse impact on the visual character and appearance of the surrounding townscape; will have an adverse impact on the residential amenity enjoyed by the surrounding area; increase traffic and parking volumes on the surrounding highway; and result in the loss of existing open space and trees. The resident also notes that the consultation/ engagement process did not provide them with an opportunity to comment.
Policy LCA SA 11 Church Grove Self-Build		
Policy LCA SA 12 Ladywell Play Tower	Support	<ul style="list-style-type: none"> • Thames Water support the site allocation.
Policy LCA SA 12 Ladywell Play Tower	Object	<ul style="list-style-type: none"> • Resident objects to the proposed redevelopment of the Ladywell Play Tower – impact on amenity of neighbouring residential properties. • Resident objects to the proposed redevelopment of the Ladywell Play Tower – impact on heritage asset and amenity of neighbouring residential properties. • Resident objects to the proposed redevelopment of the Ladywell Play Tower – impact on heritage asset and amenity of neighbouring residential properties. • Resident objects to the proposed redevelopment of the Ladywell Play Tower – impact on heritage asset and amenity of neighbouring residential properties. • The CPRE state that green space and mature trees around the site should be retained.
Policy LCA SA 13 PLACE/ Ladywell (former Ladywell Leisure Centre)	Object	<ul style="list-style-type: none"> • TfL seek detailed changes to the policy and supporting text in relation to the management of the very wide footway that forms part of the site. This is specifically in respect of managing potential unlawful parking on the very wide footway.
Policy LCA SA 14 Driving Test Centre, Nightingale Grove	Support	<ul style="list-style-type: none"> • Thames Water support the site allocation.
Policy LCA SA 15 Land at Nightingale Grove and Maythorne Cottages	Support	<ul style="list-style-type: none"> • Thames Water support the site allocation.

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Policy LCA SA 15 Land at Nightingale Grove and Maythorne Cottages	Object	<ul style="list-style-type: none"> The GLA appear to be objecting to the mix of uses proposed for the site. They state that mixed-use or residential proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes, or it has been allocated in an adopted Local Plan or industrial, storage or distribution floorspace is provided as part of mixed-use intensification.
Policy LCA SA 16 Land at Rushey Green and Bradgate Road (Aldi)	Support	<ul style="list-style-type: none"> Thames Water support the site allocation.
Policy LCA SA 17 Catford Shopping Centre and Milford Towers	Support	<ul style="list-style-type: none"> Thames Water support the site allocation.
Policy LCA SA 18 Catford Island	Support	<ul style="list-style-type: none"> TfL are supportive of this site allocation. Thames Water support the site allocation. TfL are supportive of the policy approach towards this site allocation subject to the addition of some correcting additional text.
Policy LCA SA 18 Catford Island	Object	<ul style="list-style-type: none"> Barrett London is broadly supportive of the allocation but seek an increase in development quantum and in relation to taller buildings.
Policy LCA SA 19 Laurence House and Civic Centre	Support	<ul style="list-style-type: none"> St Dunstan’s Educational Foundation support the policy. Thames Water support the site allocation. TfL are broadly supportive of the policy approach towards the site allocation – subject to some minor additions to the policy and supporting text.
Policy LCA SA 19 Laurence House and Civic Centre	Object	<ul style="list-style-type: none"> Culverley Green Residents Association object specifically in relation to proposed building heights and consequential development quantum.
Policy LCA SA 20 South Circular	Support	<ul style="list-style-type: none"> TfL are supportive of the policy approach towards the site allocation.
Policy LCA SA 20 South Circular	Object	<ul style="list-style-type: none"> St Dunstan’s Educational Foundation object to the policy – specifically in relation to the extent of land to be released from the MOL and that the greater release of land be subsequently allocated for residential development that could be used to cross-subsidise the improvement of the adjoining private open space provision. It is noted that St Dunstan’s

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		<p>suggest that the allocation may blight the development potential of their land (which is MOL).</p> <ul style="list-style-type: none"> • The CPRE state that they do not support the de-designation of MOL.
Policy LCA SA 21 Wickes and Halfords, Catford Road	Support	<ul style="list-style-type: none"> • St Dunstan’s Educational Foundation support the policy. • Thames Water support the site allocation. • TfL are broadly supportive of the policy approach towards the site allocation – subject to some minor additions to the policy and supporting text.
Policy LCA SA 22 Ravensbourne Retail Park	Support	<ul style="list-style-type: none"> • Resident expresses broad support for the site allocation with some comments relating to proposed quantum and intensity of development. Also expresses some concern in relation to the A21 Strategy. • Thames Water support the site allocation.
Policy LCA SA 22 Ravensbourne Retail Park	Object	<ul style="list-style-type: none"> • Culverley Green Residents Association object specifically in relation to proposed building heights and consequential development quantum. • Royal London Mutual Insurance Society Limited broadly support the site allocation. However, they question the indicative capacity, mix of uses, car parking provision and building heights identified for the site allocation.
Chapter 15 Lewisham’s North Areas		
LNA Vision	Support	<ul style="list-style-type: none"> • Residents, CA Ventures and Fifth State express strong support for the North Area Vision.
LNA Objectives	Object	<ul style="list-style-type: none"> • TfL object to this part of the new Plan. They suggest that it should also refer to the expansion of cycle hire along the River Thames and Creekside.
Policy LNA1 North Area place principles	Support	<ul style="list-style-type: none"> • Artworks Creekside support the policy approach. • Bellway Homes Ltd and Peabody Developments Ltd support the policy approach. • Bellway Homes Ltd are supportive of the policy. • Big Yellow Storage are supportive of the policy. • National Grid note their operational requirements for the north area.
Policy LNA1 North Area place principles	Object	<ul style="list-style-type: none"> • Residents, CA Ventures and Fifth State express some support for the policy but suggest that where sites are identified to accommodate growth to support the Council’s objectively assessed needs, heritage considerations must be considered alongside public benefits as part of the overall planning balance.

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		<ul style="list-style-type: none"> • Network Rail note that there are still no firm dates for the opening of Surrey Canal Road Station.
Policy LNA2 New Cross Road / A2 corridor	Object	<ul style="list-style-type: none"> • TfL object to this part of the new Plan. They suggest that it should also refer to the expansion of cycle hire along the River Thames and Creekside.
Policy LNA3 Creative Enterprise Zone	Support	<ul style="list-style-type: none"> • Bellway Homes Ltd and Peabody Developments Ltd support the policy approach. • Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State express support for the policy. • Bellway Homes Ltd are supportive of the policy. • TTLP are supportive of the policy approach.
Policy LNA3 Creative Enterprise Zone	Object	<ul style="list-style-type: none"> • Artworks Creekside object to detail wording within the policy – specifically relating to the quality and viability of development. • The Renewal Group appear to be suggesting that changes be made to the policy but it is unclear what the matter of soundness is. • SEGRO PLC express broad support for the site allocation but raise comments that the prime function of the Surrey Canal SIL should be to accommodate industrial and logistic uses, regardless that it is located within the CEZ, as it serves an important function not just within the local economy but across London too.
Policy LNA4 Thames Policy Area and Deptford Creekside	Support	<ul style="list-style-type: none"> • Artworks Creekside set out their support for the policy but suggest that public access through the development site may be problematic or undesirable.
Policy LNA4 Thames Policy Area and Deptford Creekside	Object	<ul style="list-style-type: none"> • Resident/ local business objects to detail elements of the policy – specifically in relation street furniture and parking provision (for businesses).
Lewisham North Area Site Allocations		
Policy LNA SA 01 Convoys Wharf Mixed-Use Employment Location	Object	<ul style="list-style-type: none"> • HPG broadly support the allocation but object to the indicative capacity identified for residential uses – they suggest that the site could accommodate more housing.
Policy LNA SA 02 Deptford Landings Mixed-Use Employment Location (formerly known as Oxestalls Road) and Scott House		

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Policy LNA SA 03 Evelyn Court at Surrey Canal Road Strategic Industrial Location	Object	<ul style="list-style-type: none"> • Vision Construct Ltd and Evelyn Court (Deptford) LLP broadly support the allocation but object to the indicative development capacities identified for the site and the requirement that development contribute towards the delivery of adjoining cycle networks. • The GLA object to the approach of redesignating sites as LSIS – or in their words downgrading it from SIL. In concert, they suggest that the identification of the BDU site as new SIL needs to be supported by more evidence to demonstrate that it meets all the operation requirements set out in the London Plan.
Policy LNA SA 04 Neptune Wharf Mixed-use Employment Location		
Policy LNA SA 05 Surrey Canal Road and Trundleys Road Locally Significant Industrial Site	Object	<ul style="list-style-type: none"> • The GLA object to the approach of redesignating sites as LSIS – or in their words downgrading it from SIL. In concert, they suggest that the identification of the BDU site as new SIL needs to be supported by more evidence to demonstrate that it meets all the operation requirements set out in the London Plan.
Policy LNA SA 06 Apollo Business Centre Locally Significant Industrial Site	Object	<ul style="list-style-type: none"> • Fosfel Apollo Limited support the allocation but object to the indicative development capacities. • The GLA object to the approach of redesignating sites as LSIS – or in their words downgrading it from SIL. In concert, they suggest that the identification of the BDU site as new SIL needs to be supported by more evidence to demonstrate that it meets all the operation requirements set out in the London Plan.
Policy LNA SA 07 Silwood Street		
Policy LNA SA 08 Bermondsey Dive Under	Object	<ul style="list-style-type: none"> • The Arch Company express broad support the site allocation, but they state that as the landowner (they are not) the site allocation, split across SIL and LSIS, be unified under a single LSIS designation. • The GLA object to the approach of designating the BDU site as new SIL. They imply that it is not suitable as SIL provision and that the allocation needs to be supported by more evidence to demonstrate that it meets all the operation requirements set out in the London Plan.

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Policy LNA SA 09 Surrey Canal Triangle Mixed-use Employment Location	Support	<ul style="list-style-type: none"> TfL express broad support for the policy approach towards the site allocation – subject to possible additions referencing bus stop provision.
Policy LNA SA 09 Surrey Canal Triangle Mixed-use Employment Location	Object	<ul style="list-style-type: none"> The Renewal Group express broad support to the site allocation but suggest that the text be “up-dated” to account for the entire planning history. They also suggest a detailed amendment relating to the contribution from development towards an adjoining cycle network. The CPRE state that green Space and mature trees alongside the railway line should be retained as these provide important habitat for wildlife.
Policy LNA SA 10 Besson Street (Kender Triangle)		
Policy LNA SA 11 Former Hatcham Works, New Cross Road	Support	<ul style="list-style-type: none"> Network Rail support the site allocation – specifically in relation to securing transport infrastructure improvements. TfL express broad support for the policy approach towards the site allocation.
Policy LNA SA 11 Former Hatcham Works, New Cross Road	Object	<ul style="list-style-type: none"> Sainsbury’s Supermarkets Ltd express a broad level of support for the site allocation. However, they object to several matters – the management of the process to secure a temporary and replacement store; the scale of housing proposed on site (they want more); car parking provision; and the delivery of the Bakerloo Line Extension. They object to the BLE as a matter of principle.
Policy LNA SA 12 Goodwood Road and New Cross Road		
Policy LNA SA 13 Achilles Street		
Policy LNA SA 14 Former Deptford Green School (Upper School Site)		
Policy LNA SA 15 Albany Theatre	Object	<ul style="list-style-type: none"> Resident objects on the grounds of loss of community space and associated open space. The CPRE state that there is a large amount of green space on site and mature trees. This should not be built on.

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Policy LNA SA 16 Land north of Reginald Road and south of Frankham Street (former Tidemill School)	Object	<ul style="list-style-type: none"> • The CPRE state that open green space and mature trees on site should be retained.
Policy LNA SA 17 Lower Creekside Locally Significant Industrial Site	Support	<ul style="list-style-type: none"> • Artworks Creekside provide broad support for the policy with comments focussed upon optimum development capacities and mix of uses. • The GLA are broadly supportive of the policy approach but seek amendments that would secure ensure that re-provided, intensified industrial, storage and distribution uses are completed in advance of any residential component being completed.
Policy LNA SA 17 Lower Creekside Locally Significant Industrial Site	Object	<ul style="list-style-type: none"> • Resident objects in relation to relatively detailed aspects of the allocation – specifically in terms of highway design, signage and parking provision. • Resident/ local business objects to detail elements of the policy – specifically in relation street furniture and parking provision (for businesses). • Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State support the allocation but question the identified scale of development capacity – they suggest that their site could deliver more housing. • APT Studio (Richard Gregg) make detailed comments in relation to the on-site provision of affordable housing, public realm improvements and protection of designated heritage assets.
Policy LNA SA 18 Sun Wharf Mixed-Use Employment Location (including Network Rail Arches)	Object	<ul style="list-style-type: none"> • Bellway Homes Ltd and Peabody Developments Ltd are broadly supportive of the site allocation but express comments in relation master planning, accessibility, tall buildings, indicative development capacity, cycleway improvements, green infrastructure and flooding and Brewery Wharf. • Bellway Homes Ltd express broad support for the site allocation. They make detailed comments in relation to the site address, the approved site master plan, indicative development capacity, the identified PTAL rating, the delivery cycleway networks, tall new buildings, and the safeguarding of Brewery Wharf. • The GLA make a vague representation to the site allocation – stating that planning permission has recently been granted for the reconfiguration of the Cockpit Arts Centre, a former office block which is now home to artist spaces. As the site is home to non-

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		designated industrial uses LBL should follow the guidance in Policy E7C of the LP2021. This makes it clear that mixed-use or residential development proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes or it has been allocated in an adopted DPD, or industrial, storage or distribution floorspace is provided as part of mixed-use intensification.
Policy LNA SA 19 Creekside Village East, Thanet Wharf Mixed-Use Employment Location		
Chapter 16 Lewisham’s East Area		
Policy LEA1 East Area place principles	Support	<ul style="list-style-type: none"> • GHL (Leegate) support the policy approach.
Policy LEA1 East Area place principles	Object	<ul style="list-style-type: none"> • British Horse Society seek to make off road multi use routes inclusive of equestrian access. It would be unlikely to have more than occasional use but would make them truly inclusive of all vulnerable road users.
Policy LEA2 Lee Green district centre and surrounds	Support	<ul style="list-style-type: none"> • GHL (Leegate) support the policy approach.
Policy LEA3 Strategic Area for Regeneration, Grove Park		
Policy LEA4 Linear network of green infrastructure		
Lewisham’s East Area Site Allocations		
Policy LEA SA 01 Heathside and Lethbridge Estate	Object	<ul style="list-style-type: none"> • The CPRE state that trees and green space to the east of the site should not be built on.
Policy LEA SA 02 Blackheath Hill Locally Significant Industrial Site		
Policy LEA SA 03 Leegate Shopping Centre	Support	<ul style="list-style-type: none"> • HUDU express broad support for the site allocation subject to a minor addition that requires new healthcare provision to be accessible from ground level.

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		<ul style="list-style-type: none"> TfL express broad support for the policy approach – subject to addition of wording that references the retention of existing mature trees on site.
Policy LEA SA 03 Leegate Shopping Centre	Object	<ul style="list-style-type: none"> GHL (Leegate) express broad support for the site allocation but suggest that it be amended in respect of development density and capacity as they believe that the site can deliver more housing. They also question the provision of new healthcare facilities on site as part of a comprehensive redevelopment.
Policy LEA SA 04 Sainsbury’s Lee Green		
Policy LEA SA 05 Land at Lee High Road and Lee Road		
Policy LEA SA 06 Southbrook Mews	Object	<ul style="list-style-type: none"> The GLA state that site may currently be home to non-designated industrial uses and the proposal is for the introduction of residential uses. Considering this the proposed site allocation should follow the guidance set out in Policy E7C of the London Plan. This makes it clear that mixed-use or residential development proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes or industrial, storage or distribution floorspace is provided as part of mixed-use intensification.
Policy LEA SA 07 Mayfields Hostel, Burnt Ash Hill	Object	<ul style="list-style-type: none"> The CPRE state that the green space and trees should be retained.
Policy LEA SA 08 Sainsbury Local and West of Grove Park Station	Support	<ul style="list-style-type: none"> TTLP are supportive of the site allocation but highlights that any applicants should consult with Transport for London to investigate future options for the bus stand
Chapter 17 Lewisham South Area		
Policy LSA1 South Area place principles	Support	<ul style="list-style-type: none"> Industrial Estate in Bellingham is noted as a successful employment zone. TfL express their support for the policy approach. Sydenham Society supports the objective of making the Bell Green and Lower Sydenham area a London Plan Opportunity area in a future update of the London Plan.
Policy LSA1 South Area place principles	Object	<ul style="list-style-type: none"> Resident questions soundness on basis of absence of Bell Green master plan. Bell Green Neighbourhood Group question soundness on basis of absence of Bell Green master plan.

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		<ul style="list-style-type: none"> • Downham Dividend Society Community Land Trust Ltd object to approach in the South Area on the grounds that it is not supported by a robust or relevant evidence base; and that the consequential policy does not respond to the specific needs of the local community. • A resident objects to the policy on the basis that the Bell Green master plan is absent. As with other resident objections she also references the delay/ uncertainty of the BLE. Also suggests that existing healthcare infrastructure is at capacity. • Resident question soundness on basis of absence of Bell Green master plan. • Network Rail are broadly supportive of the policy but seek developer contributions to deliver improvements to Bellingham Station.
Policy LSA2 Strategic Area for Regeneration	Object	<ul style="list-style-type: none"> • Resident questions soundness on basis of absence of Bell Green master plan. • Bell Green Neighbourhood Group question soundness on basis of absence of Bell Green master plan. • A resident objects to the policy on the basis that the Bell Green master plan is absent. Also suggests that Bell Green status as a regeneration node may conflict with the area's future London Plan status as an Opportunity Area. Finally expresses uncertainty caused by delay in BLE. • Resident question soundness on basis of absence of Bell Green master plan. • HUDU make a detailed objection to the policy wording seeking relatively minor amendments that make explicit reference to meeting the needs of older people and set a higher requirement for developers.
Policy LSA3 Bell Green and Lower Sydenham	Support	<ul style="list-style-type: none"> • Barratt London state their support for the policy but seek the inclusion of some additional supporting text. • TfL are broadly supportive of the policy approach – subject to the introduction of clarifying amendments to the supporting text relating to the area's future status as an opportunity area. • The GLA note the proposed intention for a future Opportunity Area at Bell Green and Lower Sydenham as it would benefit from a potential future extension of the Bakerloo Line beyond Lewisham.
Policy LSA3 Bell Green and Lower Sydenham	Object	<ul style="list-style-type: none"> • Resident objects to lack of Bell Green master plan. • Resident questions soundness on basis of absence of Bell Green master plan.

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		<ul style="list-style-type: none"> • Bell Green Neighbourhood Group question soundness on basis of absence of Bell Green master plan. • Resident objects to policy approach primarily in relation to air quality and highway matters. • Resident questions soundness on basis of absence of Bell Green master plan; also suggests that the area is not suitable for tall buildings. • Resident questions soundness on basis that the area is not suitable for tall buildings. • Resident objects to the possible building heights identified for area around Bell Green and Stanton Square. • A resident objects to the policy on the basis that the Bell Green master plan is absent. Also suggests that existing infrastructure is at capacity. Finally, makes reference to the importance of Livesey Memorial Hall. • Resident question soundness on basis of absence of Bell Green master plan. • Resident objects to the approach to tall buildings in Bell Green and Lower Sydenham. • Network Rail state that land should be safeguarded to support the delivery of strategic infrastructure, including where required for the Bakerloo line extension.
Policy LSA4 A21 corridor / Bromley Road	Object	<ul style="list-style-type: none"> • TfL state that the policy should refer to improving walking, cycling and bus connectivity to National Rail and DLR stations, to deliver broader connectivity.
Lewisham’s South Area Site Allocations		
Policy LSA SA 01 Former Bell Green Gas Holders and Livesey Memorial Hall	Support	<ul style="list-style-type: none"> • Apex Capital Partners provide broad support for the site allocation. They also comment on the requirement to take a master planning approach, tall buildings, site remediation and Livesey Memorial Hall and Open Space Provision.
Policy LSA SA 01 Former Bell Green Gas Holders and Livesey Memorial Hall	Object	<ul style="list-style-type: none"> • Resident objects on detail – doesn’t like boundary, approach to tall buildings (too tall) and open space provision. • Bell Green Neighbourhood Group objects on detail – doesn’t like boundary, approach to tall buildings (too tall) and open space provision. • A resident objects on detail – doesn’t like boundary, approach to tall buildings (too tall) and open space provision. • Barratt London are supportive of the allocation but believe that the site can support a higher quantum of development, inclusive of taller buildings.

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		<ul style="list-style-type: none"> The CPRE state that the strategic green open space on this site should be retained and the gasworks (or a significant part of it) could be set aside for a large green open space / habitat – connected with neighbouring sites. Ideally the whole site could potentially be transformed into a new public park
Policy LSA SA 02 Bell Green Retail Park	Support	<ul style="list-style-type: none"> A resident supports with some detailed questions.
Policy LSA SA 02 Bell Green Retail Park	Object	<ul style="list-style-type: none"> John Lyon’s Charity express broad support for the allocation but object to the requirements for master planning; the identified indicative development capacity and mix of uses; partnership working between landowners and on-site approach towards building height.
Policy LSA SA 03 Sainsbury’s Bell Green	Object	<ul style="list-style-type: none"> Resident questions soundness on basis of absence of Bell Green master plan – speaks to pedestrian safety. Bell Green Neighbourhood Group questions soundness on basis of absence of Bell Green master plan – speaks to pedestrian safety Resident objects on the grounds that it will result in loss of existing provision and that the proposals will be too high. A resident questions soundness on basis of absence of Bell Green master plan – speaks to pedestrian safety Sainsbury’s Supermarkets Ltd express a broad level of support for the site allocation. However, they object to several matters – the management of the process to secure a temporary and replacement store; the scale of housing proposed on site (they want more); car parking provision; and the delivery of the Bakerloo Line Extension. They object to the BLE as a matter of principle.
Policy LSA SA 04 Stanton Square Locally Significant Industrial Site	Object	<ul style="list-style-type: none"> Resident questions soundness – suggests that the Old Bath House merits local listing, with the implication that it be excluded from the red line boundary. Bell Green Neighbourhood Group questions soundness – suggests that the Old Bath House merits local listing, with the implication that it be excluded from the red line boundary. A resident Group questions soundness – suggests that the Old Bath House merits local listing, with the implication that it be excluded from the red line boundary. The GLA are broadly supportive of the policy approach but suggest that as part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of

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		industrial capacity, contributing towards meeting the borough’s industrial needs over the life of the Plan. To be consistent with London Plan Policy E7D it should be made clear in the allocation that re-provided intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied.
Policy LSA SA 05 Sydenham Green Group Practice	Object	<ul style="list-style-type: none"> • Resident objects based on insufficient healthcare infrastructure capacity • Bell Green Neighbourhood Group objects based on insufficient healthcare infrastructure capacity • A resident objects on the basis of insufficient healthcare infrastructure capacity
Policy LSA SA 06 Worsley Bridge Road Locally Significant Industrial Site	Support	<ul style="list-style-type: none"> • London Borough of Bromley support the site allocation subject to a minor amendment that references the Lower Sydenham LSIS located across the Borough boundary in Bromley.
Policy LSA SA 06 Worsley Bridge Road Locally Significant Industrial Site	Object	<ul style="list-style-type: none"> • Network Rail are broadly supportive of the policy but seek developer contributions to deliver improvements to the station approach at Lower Sydenham. • The GLA are broadly supportive of the policy approach but suggest that as part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough’s industrial needs over the life of the Plan. To be consistent with London Plan Policy E7D it should be made clear in the allocation that re-provided intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied.
Policy LSA SA 07 Lidl, Southend Lane		
Policy LSA SA 08 Land at Pool Court	Support	
Policy LSA SA 08 Land at Pool Court	Object	<ul style="list-style-type: none"> • Objection to GTA site allocation on the grounds that it is unfit as a GTA site. • Objection that site not big enough to meet need. • Bell Green Neighbourhood Group object on the grounds that it is unfit as a GTA site. • A resident objects on the ground that the site is unfit as a GTA site. • The GLA object to the site allocation stating that the site may currently be home to non-designated industrial uses in which case LBL should note that the proposed allocation should follow the guidance set out in Policy E7C of the LP2021. This makes it clear that mixed-use

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		or residential development proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes or industrial, storage or distribution floorspace is provided as part of mixed-use intensification.
Policy LSA SA 09 Catford Police station	Object	<ul style="list-style-type: none"> Phoenix Community Housing (PCH) express a broad level of support for the policy but objects to the proposed application of the master plan approach; the identified maximum building heights; the indicative development capacities; and the mix of possible uses, specifically retail. Network Rail are broadly supportive of the policy but seek developer contributions to deliver access improvements to South Bermondsey Station.
Policy LSA SA 10 Homebase/Argos, Bromley Roa	Object	<ul style="list-style-type: none"> SANTANDER C/O LASALLE INVESTMENT MANAGEMENT are broadly supportive of the site allocation but raise comments in relation to the application of the master planning and design led approaches; the indicative development capacities; building heights; and development viability. Fairview New Homes are broadly supportive of the site allocation but raise comments in relation to the application of the master planning and design led approaches; the indicative development capacities; building heights; development viability; and the Bakerloo Line Extension. HHGL Ltd seek changes to the policy to recognise their presence on the site allocation (as a business) and their desire to have appropriate re-provision of their store as part of the comprehensive redevelopment of the site.
Policy LSA SA 11 Beadles Garage	Support	<ul style="list-style-type: none"> Volkswagen Financial Services noted the Reg 19 Consultation – as an occupier on the site allocation.
Policy LSA SA 12 Downham Co-op		
Policy LSA SA 13 Excalibur Estate	Object	<ul style="list-style-type: none"> L & Q expressed broad support for the site allocation but raised comments in relation to the indicative development capacity; precise quantum of development; heritage assets; and the requirement to engage with Thames Water. The CPRE state that trees and green space on site should be retained and ideally increased.

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Policy LSA SA 14 Bestway Cash and Carry		
Chapter 18 Lewisham West Area		
LWA – Malham Road	Object – alternative/ objection site	<ul style="list-style-type: none"> Notting Hill Genesis (NHG) object to the plan suggesting that the site be designated as a Mixed Use Employment Site Allocation to include industrial and residential uses.
LWA - land at 4 Havelock House, Telecom Site and Willow Tree House.	Object – alternative/ objection site	<ul style="list-style-type: none"> The Metropolitan Police, who are the landowner, object to non-identification of the site as an allocation.
Policy LWA1 West Area place principles	Support	<ul style="list-style-type: none"> Sydenham Hill Residents provide broad support to the place principles; albeit that they remain concerned about wider views from Sydenham Ridge.
Policy LWA2 Connected network of town centres		
Policy LWA3 Forest Hill district centre and surrounds		
Lewisham’s West Area Site Allocations		
Policy LWA SA 01 111-115 Endwell Road	Object	<ul style="list-style-type: none"> The GLA appear to suggest that the policy be amended to identify the site as part of a wider strategy to meet the Borough’s industrial needs, and that consideration be given to its allocation as such to provide industrial capacity should the extant planning permission lapse.
Policy LWA SA 02 6 Mantle Road	Support	<ul style="list-style-type: none"> TfL support the policy approach.
Policy LWA SA 02 6 Mantle Road	Object	<ul style="list-style-type: none"> The GLA appear to suggest that the policy be amended to identify the site as part of a wider strategy to meet the Borough’s industrial needs, and that consideration be given to its allocation as such to provide industrial capacity
Policy LWA SA 03 Jenner Health Centre	Object	<ul style="list-style-type: none"> NHS Property Services Ltd express broad support for the site allocation but raise comments in relation to the development capacity of the site and the approach to building heights.
Policy LWA SA 04 Land at Forest Hill Station east (Waldram Place and Perry Vale)	Support	<ul style="list-style-type: none"> Resident expresses broad support for the allocation. Suggests that the Council consider a more ambitious delivery timescale.

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Policy LWA SA 04 Land at Forest Hill Station east (Waldram Place and Perry Vale)	Object	<ul style="list-style-type: none"> The GLA appear to suggest that the policy be amended to identify the site as part of a wider strategy to meet the Borough’s industrial needs, and that consideration be given to its allocation as such to provide industrial capacity
Policy LWA SA 05 Land at Forest Hill Station west (Devonshire and Dartmouth Roads)	Support	<ul style="list-style-type: none"> Resident expresses broad support for the allocation. Suggests that the Council consider a more ambitious delivery timescale. TfL support the policy approach.
Policy LWA SA 05 Land at Forest Hill Station west (Devonshire and Dartmouth Roads)	Object	<ul style="list-style-type: none"> The GLA appear to suggest that the policy be amended to identify the site as part of a wider strategy to meet the Borough’s industrial needs, and that consideration be given to its allocation as such to provide industrial capacity
Policy LWA SA 06 Perry Vale Locally Significant Industrial Site	Support	<ul style="list-style-type: none"> Resident expresses broad support for the allocation. Suggests that the Council consider a more ambitious delivery timescale. TfL support the policy approach.
Policy LWA SA 06 Perry Vale Locally Significant Industrial Site	Object	<ul style="list-style-type: none"> The GLA are broadly supportive of the policy approach but suggest that as part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough’s industrial needs over the life of the Plan. To be consistent with London Plan Policy E7D it should be made clear in the allocation that re-provided intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied.
Policy LWA SA 07 Clyde Vale Locally Significant Industrial Site	Support	<ul style="list-style-type: none"> Resident expresses broad support for the allocation. Suggests that the Council consider a more ambitious delivery timescale.
Policy LWA SA 07 Clyde Vale Locally Significant Industrial Site	Object	<ul style="list-style-type: none"> The GLA are broadly supportive of the policy approach but suggest that as part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough’s industrial needs over the life of the Plan. To be consistent with London Plan Policy E7D it should be made clear in the allocation that re-provided intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied.

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Policy LWA SA 08 Featherstone Lodge, Eliot Bank	Object	<ul style="list-style-type: none"> The CPRE state that mature trees on site should be retained.
Policy LWA SA 09 Willow Way Locally Significant Industrial Site (LSIS)	Support	<ul style="list-style-type: none"> Resident expresses broad support for the allocation. Suggests that the Council consider a more ambitious delivery timescale.
Policy LWA SA 09 Willow Way Locally Significant Industrial Site (LSIS)	Object	<ul style="list-style-type: none"> Kitewood Estates raise comments in relation to the LSIS designation of the site; the mix of uses; the quantum of development; and the approach to building heights. The CPRE state that mature trees on site should be retained. The GLA are broadly supportive of the policy approach but suggest that as part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough's industrial needs over the life of the Plan. To be consistent with London Plan Policy E7D it should be made clear in the allocation that re-provided intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied.
Policy LWA SA 10 74 to 78 Sydenham Road	Support	<ul style="list-style-type: none"> Resident expresses broad support for the allocation. Suggests that the Council consider a more ambitious delivery timescale.
Policy LWA SA 11 Land at Sydenham Road and Loxley Close	Support	<ul style="list-style-type: none"> Resident expresses broad support for the allocation. Suggests that the Council consider a more ambitious delivery timescale.
Policy LWA SA 11 Land at Sydenham Road and Loxley Close	Object	<ul style="list-style-type: none"> TfL suggest that the supporting text should refer to Policy TR4 (Parking), to clarify that parking should not exceed the maximums in that policy
Policy LWA SA 12 113-157 Sydenham Road	Support	<ul style="list-style-type: none"> Resident expresses broad support for the allocation. Suggests that the Council consider a more ambitious delivery timescale.
Policy LWA SA 12 113-157 Sydenham Road	Object	<ul style="list-style-type: none"> SG Smith Properties Limited express broad support for the site allocation but raise comments in relation to the site allocations red-line area; the Dolphin Public House; and land ownerships.
Part Four Delivery and Monitoring		
Chapter 19 Delivery and Monitoring		

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Policy DM1 Working with stakeholders to deliver the Local Plan	Support	<ul style="list-style-type: none"> • The Environment Agency support the policy.
Policy DM2 Infrastructure funding and planning obligations	Support	<ul style="list-style-type: none"> • The Environment Agency support the policy. • HUDU is broadly supportive of the policy subject to a minor amendment that explicitly references health infrastructure.
Policy DM2 Infrastructure funding and planning obligations	Object	<ul style="list-style-type: none"> • The Metropolitan Police object to the police and seek to secure developer contributions to fund the provision of policing services. • TfL consider that the schedule of planning obligations should explicitly refer to the BLE and the potential for it to be funded in part from the Community Infrastructure Levy (CIL) and planning obligations.
Policy DM3 Masterplans and comprehensive development	Support	<ul style="list-style-type: none"> • Bellway Homes Ltd and Peabody Developments Ltd are supportive of the policy approach. • Bellway Homes Ltd support the policy approach. • Lewisham and Greenwich NHS Trust support the policy approach.
Policy DM3 Masterplans and comprehensive development	Object	<ul style="list-style-type: none"> • Landsec object to the policy requirement that outline applications be followed by full applications. • Lewisham House No.1 object to the requirement that proposals for tall buildings be supported by a master planning approach.
Policy DM4 Land assembly	Object	<ul style="list-style-type: none"> • Landsec to specific elements of the land assembly policy relating to securing comprehensive redevelopment.
Policy DM5 Meanwhile uses		
Policy DM6 Health impact assessments	Object	<ul style="list-style-type: none"> • HUDU are broadly supportive of the policy approach but seek additional wording to ensure the health benefits set out in HIAs and the minimisation and mitigation of potential adverse impacts are secured. Reference as in other policies to use of planning conditions or obligations should be incorporated.
Policy DM7 Monitoring and review	Support	<ul style="list-style-type: none"> • The Environment Agency support the policy. • TfL are supportive of the policy approach subject to a minor correction.
Policy DM7 Monitoring and review	Object	<ul style="list-style-type: none"> • HUDU are broadly supportive of the policy but seek an expansion of the monitoring regime to include health inequality indicators – to better able performance monitoring in equalisation of health inequality.

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Part Five Appendices and Schedules		
Appendix 1: Abbreviations		
Appendix 2: Glossary		
Appendix 3: Non-strategic policies		
Appendix 4: Policy replacement table and deleted policies		
Appendix 5: Further information on proposals for public houses		
Appendix 6: Housing Trajectory and Five-Year Housing Land Supply		
Schedule 1: Strategic and local views, vistas and landmarks	Object	<ul style="list-style-type: none"> • Table 21.1 Livesey Memorial Hall should be added to the list of Local Landmarks. • Sydenham Society suggest that the view from Sydenham Hill Ridge towards the City of London is missing from the tables of London Strategic Views and Lewisham Local Landmarks.
Schedule 2: Designated heritage assets	Object	<ul style="list-style-type: none"> • Table 21.2 Missing from Conservation Area list - The Thorpes Conservation Area. • Table 21.2 London Squares – Taymount Rise is missing from the list. • Sydenham Society suggest that the Sydenham Thorpes is missing from the schedule of Conservation Areas, as is the Thorpes Extension which takes in the commercial terraces of Sydenham Road and was designated in 2007.
Schedule 3: Non-designated heritage assets	Object	<ul style="list-style-type: none"> • Sydenham Society suggest that Longton Avenue and Lawrie Park are missing from the schedule of Areas of Special Local Character
Schedule 4: Designated employment land		
Schedule 5: Town centres and Primary Shopping Areas		<ul style="list-style-type: none"> • Table 21.5 No mention of any retail existing at Bell Green, or on Perry Hill/Catford Hill.

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Schedule 6: Creative enterprise zone, cultural quarters and night-time economy hubs		<ul style="list-style-type: none"> Table 21.6 Cultural Quarters. Please add Bell Green.
Schedule 7: Designated open spaces	Object	<ul style="list-style-type: none"> AA Homes & Housing object to the identification of land bounded by Courtraï Road, Eddystone Road, rear boundaries of properties in Buckthorne Road and the New Cross to Forest Hill railway cutting in Crofton Park as Metropolitan Open Land.
Schedule 8: Designated Sites of Importance for Nature Conservation		
Schedule 9: Local nature reserves and ecological corridors		
Schedule 10: Sites of geodiversity interest		
Schedule 11: Regeneration nodes growth nodes and growth corridors		<ul style="list-style-type: none"> Table 21.11 Growth corridor - Perry Hill- Catford Hill not listed but shown on Policies Map.
Schedule 12: Tall Building Suitability Zones	Object	<ul style="list-style-type: none"> Sydenham Society disagrees with the maximum heights of buildings at the southern corner of the Bell Green gasworks site being set at 16 storeys; similarly the Worsley Bridge Road site at 12 storeys.