



**The
Telegraph Hill
Society**

TELEGRAPH HILL SOCIETY RESPONSE TO THE DRAFT LEWISHAM PLAN

2 April 2021

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INTRODUCTION

1. We welcome the opportunity to set out the Telegraph Hill Society's response to the draft Lewisham Plan Regulation 18 stage "Main Issues and Preferred Approaches" document dated January 2021. We have generally sought to follow the order of the Plan although there are separate sections on general comments and on areas which we feel the Plan should address but does not. As a result of this, like the Plan, there is a degree of repetition.
2. Our views relate to the Plan as it affects the residents in the Telegraph Hill Conservation Area and therefore we do not seek to cover other policy areas such as social housing in detail.

THE VISION

What a Vision should be

3. We comment on this separately before commenting on Part One of the Plan in detail as we believe this is fundamental to the Plan.
4. The Vision set out in §¹ 3.1² is aspirational. We would question however as to whether the Plan achieves this and in particular whether the policies are consistent with creating a place "where all generations ... choose to stay". We comment within the body of this paper on the impact of high-rise buildings, the increasing density and the lack of green space. The Plan itself notes the lack of local employment but the Vision sets out nothing about changing this.
5. The Strategic objectives do not appear to build on the Vision and the Plan does not follow it through. Whilst the Vision is long-term, the Plan is not, it is merely incremental, constrained by the Mayor of London's current London Plan whether or not that actually leads to Lewisham's Vision. Any plan should work forward from the Vision, starting from first principles of what the Borough should look like and then accepting that parts of such a plan would not be achievable whilst those current policies are in place and whilst funding is in short supply, but nevertheless setting out long-term goals and measurable targets. That way the Vision would be a true aspiration for the Borough and a bench mark for future policies.
6. As set out, the Borough is in danger of repeating the mistakes of the last fifty years whereby it has become a dormitory suburb for the City with low employment rates and ever more high-rise buildings with small apartments, and with a proportion of residents moving out every year as they have families to find more appropriate accommodation elsewhere. The trend of developments of recent years, such as in Lewisham Centre and around Deptford Broadway, predominantly one or two bed units, appear to be continued in this plan (certainly as far as the illustrations show) and will ensure that the vision for that the vision for residents of all generations to choose to stay in the borough can NEVER be met, as single people go on to meet partners and partners choose to have children. Removing the restrictions on conversion of houses into flats will further exacerbate the problem.

¹ Paragraphs in the draft Lewisham Plan are denoted by §. References to other paragraphs, unless otherwise stated are references to this paper.

² § 3.2 appears to be missing from Plan.

7. The Vision needs to start from long-term metrics as to, for example, the amount of green space each resident should have, the minimum suitable accommodation that would ensure residents can remain in the Borough for life, targets for the amount of employment in the Borough by 2040³, targets for transport capacity and what might be, regardless of the current Mayor of London's aspirations, a reasonable population for a sustainable borough where everybody has an improved quality of life. In addition to these overriding metrics and their targets, there should be targets set for each of the **Strategic Objectives** set out on plan pages 50 and 51.
8. Without such, it will be impossible to tell how the Borough is achieving its Vision. At present the Plan is woefully short on such metrics and quantified targets except where they are enforced by the Mayor of London's short-term population plan.
9. It may be inferred from the above that we do not believe the population increases that the Mayor of London is insisting upon are consistent with Lewisham "Vision". We understand the need to comply with the London Plan but if the ideal population level for the Vision is not in line with the current Mayor of London's strategy, this should not affect long-term goals. Such bits of the Vision may well need to be subordinated to the London Plan at present but could be lobbied for over the 20-year life of the Plan. Building tall tower blocks may not be the right answer for the Borough or its residents long-term even if the incoming London Plan requires them now and even if they are "right" for London as a whole.
10. The Vision also needs to look at how to create more "15 minute cities" within the Borough with everything from all necessary shops, surgeries, schools, parks, sports facilities, museums and leisure centres within a 15 minute walk or public transport journey; and how shopping modes and delivery methods might change during the 20 years, considering how to cater for those. It also needs to look proactively at how connectivity could be improved rather than simply document schemes already on the drawing board: how difficult cross borough, rather than radial transport, can be improved (trams, guided bus ways, a council led pooled electric car system etc), appreciating that, whilst the Council is not in control of such things, it can nevertheless lobby for them.
11. Finally, and very importantly, the Vision needs to be community-centric. If the intention is for a "*place where all generations not only live but thrive*", the Plan needs to ensure that it looks to existing residents and their needs as well as taking account of future population growth. As part of this, it is fundamental that communities are involved. Communities that feel disenfranchised are not happy, thriving communities and will see the Council as their enemy not their friend. There is little in the Plan or Vision on community involvement. In our discussion of Part Four (paragraphs 260 to 263 and 269 to 270 below) we make recommendations as to what must be done to involve residents.

Lewisham's role in the Vision

12. Whilst we appreciate that the role of a development plan is to regulate development, in order to realise its Vision for the borough, Lewisham Council itself has a wider role to play. It must be self-evident, for example, that, no matter what developers do on new sites, the **Strategic Objective G17** cannot be met if existing pavements are allowed to deteriorate.

³ There is a reference in § 2.16 for floorspace targets this is based on estimated demand not on what is needed to achieve the objectives; furthermore it does not seek to quantify that in terms of employment levels for those living within the Borough.

Nor can it right for the Borough to impose conditions on green spaces on developers or tree preservation orders on residents to meet **Strategic Objective D9**, if it does not (to give another example) maintain the street trees in its care. We believe that the Borough should explain throughout the Plan how it will itself aspire to meet the Vision and Strategic Objectives as regards those assets for which it has responsibility and give commitments, where necessary, to do so. Without it the Vision ceases to become a vision for the whole of Lewisham, but a fragmented vision of unconnected development sites.

13. If however the Plan is meant to be solely a Development Plan we would suggest that this should be made clear and the Vision and the majority of Part One relegated to supplementary material seeking to explain the development policies. In this case, Lewisham Council should develop a separate document setting out how it will contribute to the achievement of its Vision, taking account of the comments we make in this respect there.

PART ONE

14. We have set out above our overall concerns that this is not what a Vision, Strategy and Plan should be. Notwithstanding this we have made specific comments based on the existing Vision and Strategic Objectives in this section

Introduction

15. **§ 3.1** The Vision for Lewisham mentions “vibrancy of our high streets, local businesses, arts and cultural establishments, our evening and night-time economy and our world-renowned institutions”. There is no reference to the heritage of the Borough nor reference to protecting this within the “Vision for Lewisham”. There should be such specific reference in order to support **Strategic Objective F**.
16. As noted above, **§ 3.1** also fails to mention increasing the Borough’s employment base. There should be such reference in order to support **Strategic Objective C**.

Strategic Objectives

17. Whilst we comment briefly on the strategic objectives here, following the order of the sections in the draft Plan, more detailed reasoning for our views is given under our responses to the corresponding policies in Part Two. Brief cross reference is made here to a selection of those responses.
18. We welcome the general principles in **Strategic Objectives B2-4 (“Housing Tailored to the Community with Genuinely Affordable Homes” together with G17-19 (“Healthy and Safe Communities”)**. However we question throughout our response whether these objectives are met by the policies which seem to favour accommodating putative new population over the needs of existing residents by providing accommodation which does not meet the aspiration of new residents whilst at the same time reducing amenity for existing residents. (paragraphs 63 to 66).
19. We specifically welcome **Strategic Objectives C5 and Strategic Objective C6 (“Local economy”)** (paragraphs 162 to 177).
20. **D9 (“A Greener Borough”)** makes no reference to protecting gardens which contribute a larger element of the green space within the Borough than parks and are known to be significant in providing a cleaner atmosphere and in the mental health of residents (see also **Strategic Objective C**) and **Policy QD11**.
21. Policy **GR1** and **§ 10.1** makes it clear that green infrastructure includes “*private residential gardens*” and allotments. **§ 10.3** makes clear the benefits that private gardens bring. We have seen estimates that the majority of trees across London are in private gardens. Recent research by the University of Bristol¹, for example, has indicated that residential gardens are the source of 85% of the nectar produced in towns and cities and are therefore crucial in conserving the bee and butterfly population. If London is to be “*at least 50% green by 2050*” (plan page 355) then all proposals for building on gardens and allotments need to be resisted. The lack of reference to gardens should be rectified and this would support the protection that the Council is seeking to give in **QD11**. (paragraphs 184 to 197)

22. **Strategic Objective E11 (“Responding to the Climate Emergency”)** could also usefully cross-reference to **Strategic Objective H21 (“Transport capacity”)** without which any aspirations to reduce car usage are likely to fail.
23. We welcome **F13 and F15 (“Celebrating our local identity”)** in principle although we dislike the phrase “*positively*” as this is capable of a very wide interpretation by developers. We would prefer “*sympathetically*” or better “*in keeping with*”.
24. We have concerns over **F14 (“Celebrating our local identity”)** and the reference to “*optimal use of land to facilitate the regeneration and renewal of localities within the London Plan Opportunity Areas*” since part of the Telegraph Hill Conservation Area and the whole of the neighbouring Hatcham Conservation are within an “Opportunity Area”. Conservation Areas emphatically do not require the sort of “*regeneration*” and “*renewal*” envisaged by this element of the Plan, they require conservation. We would therefore propose the introduction of the following words: “*optimal use of land to facilitate, where applicable, the regeneration and renewal of localities....*” (paragraphs 34 to 36 and 40 to 50)
25. **F15 (“Celebrating our local identity”)** references conservation and enhancement of the historic environment, in our view, to make clear what “enhancement” means it should read “*conserving, restoring and enhancing*”. (paragraph 145)
26. We welcome **G16-19 (“Healthy and Safe Communities”)** but cannot see how the level of density of new buildings proposed in this Plan, with the tall towers that will be required to achieve this and the impact upon the already deprived and green-deficit northern part of the Borough, is compatible these Strategic Objectives. The impact of tall towers and lack of green space is already well known to have bad effects on physical and mental health and contribute to deprivation. (paragraphs 63 to 66).
27. We note specifically that the Consumer Data Research Centre has ranked areas using data on pollution levels, health services, green spaces, pubs and gambling shops using its health index (Access to Healthy Assets and Hazards (AHAH)). Areas are ranked from 1 (Healthiest) to 10 (Unhealthiest). New Cross ward has a ranking of 10 and, along with Brockley ward, has the most unhealthy rating using AHAH in South East Londonⁱⁱ.
28. There are references in **H20 (“Infrastructure”)** and elsewhere to providing the infrastructure to “*support growth*”. In New Cross we need the infrastructure to continue to support pre-COVID19 levels of activity which exceeded the system’s capacity (assuming such capacity requirements will return). There should not be an inbuilt assumption of growth without some clarity as what is meant: population growth may not be consistent with **Strategic Objective A1** or indeed “*sustainable places*”, whereas economic growth, to the extent that it does not adversely affect the climate emergency, is likely to be positive for all Strategic Objectives. We note that the objective will not be met by the current Borough policies which appear to allocate resources by ward without sufficiently considering the impact on neighbouring wards. Further issues are outlined in paragraphs 178 through 183.

Key considerations

29. In the subsequent drafts of this Plan, a key consideration will need to be the likely long-term effect of changes caused by the COVID-19 pandemic on London’s projected population growth, on commuting and use of private vehicles and on shopping. The desirability of dense and high-rise developments, already under question as a result of the Grenfell Tower fire, are made even more doubtful by the ease with which this allows the spread of disease

- throughout a community. Furthermore larger properties with ‘spare’ office rooms will be required more often as home working increases and we anticipate an increasing demand for what would previously be regarded as three bed roomed houses as two bedroom plus office accommodation. The Borough may need to work with the Greater London Authority on this as it seems likely that the recently published London Plan, developed before the pandemic, is already out of date and therefore is an inappropriate basis on which boroughs should be basing their plans.
30. The second key objective, building on the Strategic Objectives and the Vision that Lewisham should be place in which people wish to live, should set out in more detail how the Plan seeks to address the deprivation in the Borough and specifically the health of the Borough’s residents (see AHAH reference above). We believe, for example, that this will mean a commitment, for example, to establish new parks and open spaces within the Borough, particularly in the north of borough; to increase, rather than continue to reduce, the amount of green space available per person.
31. **§ 3.9 (“Growth requirements”)** states that the Local Plan *“must help to facilitate a significant amount of new development”*. As we have argued above it is not clear that this is compatible with the Vision for 2040 although we accept the short-term need for it to comply with the current London Plan and to address a back-log deficit of building in past years. However, the impact of COVID-19 will cause the level of new housing development required to be re-assessed whilst, in order to meet **Strategic Objective C6** and redefine the status of Lewisham, currently a mere dormitory borough, there may need to be a shift away from an emphasis on housing to an emphasis on hyper-local workspace and employment.
32. With regard to the reference in **§ 3.12** to *“Green and Open spaces”*: the terminology is unclear. Does it mean only spaces which are both green and open (i.e. “green open spaces”) or does it include all spaces which are either (i.e. “green” or “open” spaces)? We would expect that the key consideration should apply to all spaces which are green, whether or not they are open to the public in view of the commitment of the Mayor of London to a 50% green city, which cannot be achieved without protecting garden and allotment spaces as well as public spaces. Therefore using “and” rather than “or” in *“Green and Open Spaces”* is misleading and potentially open to misinterpretation.
33. There is a reference missing in the fourth line of this section to (presumably) to **figure 3.3**.
34. In **figure 3.1** the Key shows a single colour but the map has two shades of pink. We agree that Telegraph Hill should be scoped into considerations affecting the Telegraph Hill Conservation Area including, principally, those relating to the New Cross/New Cross Gate Opportunity Area. Indeed, for the purposes of considering the effects of developments in that area we believe that considerably more of Telegraph Hill is affected and should be scoped in. We do not believe it is correct, however, to include any part of the Telegraph Hill Conservation Area (or for that matter the Hatcham Park Conservation Area) as parts of an *“Opportunity Area”* despite the error in the London Plan. The definition of *“Opportunity Area”* as set out in the Glossary is an area which has the opportunity *“for accommodating large scale development to provide substantial numbers of new employment and housing, each typically more than 5,000 jobs and/or 2,500 homes, with a mixed and intensive use of land and assisted by good public transport accessibility.”* Clearly the two Conservation Areas do not meet this definition. The Plan needs to make a clear distinction between those areas which are, in themselves, *“Opportunity Areas”* and those areas which do not meet that

definition but which are significantly impacted upon, and must be considered by, any proposals within the Opportunity Area.

35. In the on-line question and answer sessions sections we were informed that the Opportunity Areas were set by the Mayor of London and cannot be changed even if they are clearly wrong and include areas which cannot be Opportunity Areas as they do not fall within the definition. If, however, this is the case, the Plan can nevertheless still scope them out of development or, at the very least, flag the contradiction involved in including Conservation Areas within Opportunity Areas (given the definitions of these terms).
36. **Figure 3.2** highlights the Hatcham Works site as a “Reinvent” area. Whilst there can be no objection to reinventing the site, the Council should be aware of the depth of feeling against the type of proposals that were put forward (and withdrawn) by Sainsbury’s and Mount Anvil in 2019-2020 where 77% of the respondents strongly objected. The results of that survey are given in Appendix 2.
37. **Figure 3.3** is headed “green infrastructure” whilst the colour code indicates that it shows “Open Space”. These are not identical terms (see the definitions in the Glossary). Confusion between “green” and “open”, “green or open” and “green and open” abounds throughout the Plan and needs to be resolved.
38. **Figure 3.3** does not show all the green infrastructure of the Borough nor does it show all the open spaces. It shows public parks, nature reserves etc. The green infrastructure of the Borough includes private gardens, community owned gardens, allotments and street trees – all of which are important to the ecology.
39. With reference to **§ 3.18** and **figure 3.5**. We believe there is limited potential for growth at the Hatcham Works site at New Cross Gate unless and until the BLE is built. Whilst the site has high PTAL connectivity there is simply no capacity on local public transport, particularly on the existing rail services, to accommodate significant new passenger growth.

OL1: Delivering an Open Lewisham

Policy

40. We remain strongly of the belief that policy **OL1** is wrong as regards the application of Opportunity Area if the phrase is meant to apply to those shown in **figure 3.1** which shows part of the Telegraph Hill Conservation Area in the Growth Area. We would refer back to our comment on **figure 3.1** in paragraphs 34 and 35. The Telegraph Hill Conservation Area is not an Opportunity Area as defined. If the policy is meant to mean that the area is included only because the Mayor of London has included it (wrongly) as such in the London Plan, then this should be made clear, together with a statement it will be treated as within the Opportunity Area only for the purposes of assessing the impact of a development on Heritage Assets.
41. We are concerned about the statement in **OL1A.d** “Facilitating new development along ... other strategic corridors (such as the east-west New Cross Road/A2 corridor). The policy needs to take into account the impact of this on the Telegraph Hill and Hatcham Conservation Areas and its potential conflict with **Strategic Objective F15**.”
42. **Policy OL1.g** is important and welcome, but clarity is needed on what a “design-led approach” means. We wholly agree that any design needs to be “informed by an understanding of local area character (including the historic, cultural, natural and built

environment), to enhance local distinctiveness, and to help secure liveable, walkable, healthy and safe communities that are inclusive to all". However, "informed" can be interpreted in many ways and, under some interpretations, may mean simply that information has been provided rather than acted upon. We would prefer this to say "led by an understanding..." or "take into account an understanding of..."

43. In order to be consistent with **Strategic Objectives F13 and F15**, the requirement to "*enhance local distinctiveness*" should read "*preserve or enhance local distinctiveness as appropriate*". Taken to extremes, local distinctiveness in some areas might be enhanced by complete rebuilding – this would obviously not be appropriate in Conservation Areas. To give further guidance on what design is appropriate in order meet these objectives the section should also state that new development should ensure that it harmonises with the existing character of Lewisham's communities and townscapes.
44. We are unclear as to how the conflicts here are intended to be resolved. There is a trade-off between, for example, the use of vehicles (which for many make a community liveable and for elderly and disabled people may be essential for inclusivity) but which can also be regarded, particularly by the young and fit, as unhealthy.
45. **OL1.h** does not currently refer to protecting private green space (see paragraph 18) and must do so.

Policy explanation

Opportunity areas

46. As we have stated in paragraph 34, Telegraph Hill is partially included as an Opportunity Area when it clearly does not meet the definition.
47. **§ 3.24** states that Opportunity Areas these are also areas where neighbourhoods, businesses and local residents stand to benefit from focussed regeneration and urban renewal, particularly where deprivation is experienced. From the huge objections to proposed development by Sainsbury's/Mount Anvil at New Cross Gate it is not at all clear that there is benefit. Certainly, from our survey as part of the consideration of the Hatcham Works proposals, residents of Telegraph Hill did not feel they necessarily stood to benefit from the type of regeneration that was envisaged there then nor in the New Cross Area Framework. The area around New Cross Gate is deficient in green space and new development has the capacity to reduce the PER CAPITA amount of green space rather than increase it, as was seen from the Sainsbury's/Mount Anvil development proposals. The area also ranks high as being unhealthy (see paragraph 27). It is extremely difficult to see how developments of the size proposed at Hatcham Works (Lewisham Plan **page 603 et. seq.**) can do anything other than make these problems worse. Parks and open spaces are needed, not more building and more people.
48. **§ 3.25** states an aim for "*Opportunity Areas [to] fully realise their potential*". However, it does not state what that potential is. The potential for any Conservation Area left within an Opportunity Area is surely better heritage conservation and restoration. As far as the Hatcham Works site is concerned the best potential – given the quality-of-life issues in the area already referred to in paragraph 27– is for a park. Cramming more housing in does not realise any potential for existing residents whatsoever.
49. We wholly agree with the statement that the Bakerloo line extension would be essential to supporting Opportunity Area objectives and providing the necessary transport infrastructure

to facilitate a significant uplift in homes and jobs in the New Cross ward and it follows that no significant development should take place before the BLE is in place. However, we believe that other considerations outlined in these sections mean that, even with the BLE in place, there should be no significant uplift in homes.

50. In summary, we do not believe Conservation Areas should be scoped in to Opportunity Areas as defined. However, they should be referenced for the purposes of taking into account the impact of Opportunity Area development on neighbouring Conservation Areas.

Connecting Communities

51. This section makes reference in a number of places to “growth” and we would refer you to our comments above in paragraph 28 as to the need to distinguish between population growth and economic growth. One does not imply the other and they sometimes conflict (for example: space devoted to small workshops for local employment is not available for housing).
52. We welcome the approach to re-vitalising local centres as outlined in **§ 3.33**. However as we argue in our comments on policy **EC12** and **EC14** (paragraphs 164 to 173) below, the concept of a 15-minute city means ensuring that employment, shops and services are where people live rather than people having to use transport (public or otherwise). In a 20 year vision, more needs to be done embrace this approach rather than that which is advocated here.
53. **§ 3.35** states “There is an opportunity for greater intensification along strategic routes, where development responds to the status of the road and its greater degree of connectivity.” It must be made clear in the Plan that this must not be at the expense of the historic fabric of the area. Similarly, the statement “give priority to movement by walking and cycling, as well as addressing vehicular dominance and reducing vehicle speed.” needs to make clear that this is not to result in diverting more traffic onto residential side roads. Traffic should be confined to the existing main roads (see our comments on policy **TR1** at paragraphs 211 and 212.)
54. A number of statements are made about traffic flows along key roads throughout the Plan, however the Plan only appears to consider the local traffic. The A2 in particular is the main route to London from Kent and cannot be considered in isolation from this larger demand for movement through the Borough. We asked at a North Area Consultation meeting whether the Borough had figures for how much traffic on the major arterial roads was local and how much was generated from elsewhere in London or from outside Greater London. We received no answer, but this information is obtainable and must be key in deciding to what extent transport policies within the Borough can be implemented with effect.
55. In considering road traffic a revised Plan should also take into account the needs of businesses and the elderly and infirm (not all of whom are eligible for blue badges) to use motor vehicles; it also needs to take into account potential increases in traffic as a result of the move to home shopping as we set out in our comments on policy **TR5** (paragraph 221).
56. One of the key needs in reducing vehicle traffic is giving consideration to cross-London traffic flows. Routes are well served radially but poorly served east-west even within the Borough. We deal with this further in our comments on Section 12 of the Plan (paragraphs 200 and 201) below.
57. **§ 3.44** states “Elsewhere, the Local Plan will support the sensitive intensification of smaller sites throughout the Borough. The development of smaller sites (including on backland and

infill sites, as well as residential extensions) will be important to meeting future needs, particularly for housing. We will prepare guidance documents to support the Plan policies and to help ensure that development of this kind is appropriate to its location and wider setting.” We strongly object to backland and infill development other than on brownfield sites. We note the protection of back gardens that Policy **QD11** seeks to establish but feel it does not go far enough with protection of all garden space. For the reasons we set out in paragraph 115, gardens are hugely important in those areas of the Borough, particularly in North Lewisham, where there is a lack of green space and access to nature.

58. We would generally support **§ 3.46** which states that the Borough “*recognise(s) that good design is integral to good planning. This means that new development must be based on an understanding of the site context and respond positively to the Borough’s local distinctiveness. The use of the design-led approach will help to ensure that those unique and valued features of our communities remain at the heart of the spatial strategy, and are fully considered in planning decisions.*”
59. However, we are not convinced that a “*design-led*” approach will bring this about. There is little evidence that any “*design-led*” development has done this in the Borough to date. The approach needs to involve those who live in the area and **§ 3.46** should reflect this. Whilst we appreciate that the Council has a Design Panel, this comprises mainly of professionals and not of those who will have to live in the areas affected by the designs considered. The Borough should make a commitment to improving consultation processes, when funds allow, by supplementing the Design Panel with the Amenity Societies Panel which previously provided this involvement but was cancelled due to a stated lack of resources. It would also be helpful if the Borough could commit to assisting in the production of Neighbourhood Plans, should the funds be available, as these are difficult for many of the smaller but well defined neighbourhoods, such as Telegraph Hill, to produce without such support (see our comments on Part Four in paragraphs 259 through 270).
60. Again, we also take issue with the word “*positively*” in this context in **§ 3.46** - see our comment at paragraph 42. For Conservation Areas, “*Good design*” will also need to be led by revised Character Appraisals, with considerably more detail than the existent ones, and more developed SPGs. We would welcome a commitment to this, when funds allow, in the explanatory section of the Plan here.
61. We support the principle of **§ 3.47**. A specific statement should be made to the effect that new development must help to reinforce the special characteristics of the Borough. We would also refer to the need to specify assistance to residents in working to defining those special characteristics still further, in order to ensure that they are preserved thereby supporting **Strategic Objective F13**.

PART TWO – GENERAL COMMENTS

62. This section sets out a number of comments generally applicable to Part Two of the Lewisham Plan and also, where applicable, to other sections including Part One when reference back is required.

Meeting the strategic objectives and design-led development

63. We do not believe the draft Plan can achieve **Strategic Objectives B3 and B4 or G16-19** with a “*design-led*” approach to development which apparently concentrates on high rise buildings, necessarily of modernistic design, to meet population growth targets which, although set by the Mayor of London, may or may not be set.
64. As the 2018 report on housing density to the Greater London Authorityⁱⁱⁱ made clear in its survey of high rise high density housing in London:

“For the market sector, the new schemes are residences for one stage of the lifecycle—broadly speaking young professionals. While in theory they could also attract older downsizers, the responses to our survey suggested there were not many of them. And it is unusual for families with children to live in market-price units (whether owned or rented) in modern dense schemes. A high proportion of children are in social tenant households who have less effective choice. This is a question of cultural preference (most people aspired to live in houses with gardens) but also of affordability: some people said they enjoyed living where they were now but would never be able to afford a family-sized unit in the same schemes and would perforce have to move if they had children.”

Create Streets in their report on Liveable Communities^{iv} emphasise the same point:

In poll after poll it is clear that most British people (and most people around the world) would rather live in houses in streets than flats and would almost always avoid tower blocks. In the most recent national survey, in December 2013, 80% of respondents wanted to live in a house and 6% in a flat in a modest building consisting of fewer than 10 units. Only 3% wanted to live in a building with more than 10 units in it.

They continue:

Another recent Ipsos-MORI survey in London was limited to those aged over 64 (a group less likely to support tower block living) and included those between 16 and 18 (a group more likely to support tower block living). Despite this, the results were still clear-cut. Only 27% of those polled would be ‘happy living in a tall building.’ In contrast 56% would not be happy. The desire not to live in a tall building was also more strongly held. 29% felt strongly about not living in a tower block. Only 10% felt strongly about wanting to live in one. This survey was corroborated by a YouGov poll which found that only 33% of Londoners supported more-high rise residential towers.

65. The same research supports shows a strong preference for residents to live in lower rise more traditional developments of the type which encourage community and cohesion, lowers community stress and more general contributes to addressing the wider issues of physical and mental health envisaged in **Strategic Objective G16** in a way that high-rise developments do not. This type of development, which can be relatively dense, is exemplified by the redevelopment in the Honor Oak estate in the 1990s, and (a decade or so

earlier) the bungalows and town houses in the Somerville Estate. Further back in time examples such Fairlawn Mansions on the New Cross Road show how higher density can be achieved without entirely destroying the unique heritage and appearance of an area.

66. We set out in Appendix 1 the basic criteria which CreateStreet's research has shown would lead to development which people feel would lead to healthy communities in which they would wish to live throughout their lives. We strongly urge that the Council's Development plan be re-written to take into account these principles as a "community-led" rather than a "design-led" and "housing target" led document which will not meet the Borough's Strategic Objectives.

"Will support"

67. The terminology in this proposed Plan which turns the prohibitions of current UDP around to statements of support leaves the whole Plan open to bad development. We understand that both Government and the Mayor of London wish the Council to be more supportive of developers, but the UDP made it clear that poor developments would be rejected by the Council. This does not. A statement that, for example, the Council "*will support design-led plans*" does not mean that will not support plans which are simply profit-led, nor does a statement that the Council will support "*good development*" mean it will not also support bad development.
68. We believe that the previous approach was clearer and do not believe that it is the Council's role to support developers over and above supporting residents or other stakeholders who might be affected by a development. The Council has a duty towards its existing residents as much, or more, than to potential unknown future residents and property developers and, whilst there is much in the Plan about supporting development, there is nothing in the Plan about the Council supporting existing residents concerned about the impact of such developments. The imbalance against existing residents needs addressing.
69. If the Council is insistent in its proposed approach then the word "only" should be inserted in every case so that policies read "*The Council will only support ...*" making it clear that, although the Council might not oppose bad development, it will never support it⁴. At present the word "only" is only used in some policies, implying that in other cases, where the word is not used, the Council may support anything.
70. A more general statement that the Council would oppose plans which do not conform to its policies would moreover be welcome and would ensure that the Plan is clearer, more even-handed and fairer to all.

Permitted development rights

71. Changes to Permitted Development Rights are likely to challenge both the Council's vision and its detailed policies as set out in Part Two of the Plan. Management of these will therefore require more engagement by the Council in Article 4 directions where appropriate. We appreciate that funds are not currently available to significantly extend protection through Article 4 directions, but that does not mean that this will be the case throughout the Plan period to 2040. A commitment should be made that, where and when

⁴ Inter alia: QD1.C, Q1D.F, QD9.A, QD10.C, QD13.A, HE2.B, HE2.D, HE3.A, HO2.C, HO6.B, HO7.A, HO10.B, EC8.A.b to e, C12.A, E12.B, E14.F. TR4.F

appropriate, powers will be taken to ensure that the Vision as set out in the Plan is protected.

Inter-relationship of policies, conflict and precedence

72. The various policies in Part Two appear to conflict with each other as do policies within Part Two and Part Three. Instances will arise for example in conflicts between preserving local character as required in **HE1** and **Strategic Objective F13** and:

- optimising site-capacity (**QD6**), building tall towers (**QD4**) and preserving local character (**HE1**)
- optimising the use of small housing sites (**HO2**) or developing infill sites (**QD11**) and preserving local heritage (**HE1**)
- minimising greenhouse gas emissions (**SD3**) or
- managing heat risk (**SD5**).

73. Given that heritage assets and their surroundings, once destroyed, cannot ever be recovered we would prefer that the heritage policies are given precedence but, however this is decided, the Plan needs to give clarity as to which policies take precedence in the event of conflict. Otherwise the Plan is in danger of becoming a “developers’ charter” whereby one part of the Plan can be played off against another as developers pick and choose to their advantage, with the ever present threat of costly resolution through the courts.

Explanations

74. The status of each “Explanation” is unclear. There are a considerable number of statements of intent in the “Explanation” paragraphs (for instance at **§ 6.10** on Lewisham’s Historic Environment, see paragraph 136 on policy **HE1**; or on Telecommunications, see paragraph 224 on **TR7**) which are not carried through to a policy on the green pages and therefore do not seem to be explanations for the policy. If the “explanation” *obiter dicta* are meant to be policy they need to be reflected in the policy, if they are not and do not in fact explain a policy, an indication needs to be given as to what their purpose is and what weight will be given to them in planning decisions. Are such comments better described as “supplementary guidance” rather than as “explanation”?

75. Accepting that good design is a matter of taste, there must be better examples of development than those illustrating the Plan and Part Two in particular. Amongst other issues, we would note the following.

- There are many examples of high-rise buildings given, but even where illustrations meant to be of heritage assets, there are none of the Victorian housing stock that makes up the majority of the Borough.
- The illustration on **page 138** of backland development is unsympathetic given the buildings on either side of it (see our comment in paragraph 129 below and our examples of sympathetic brown field development).
- The illustration on **page 193** shows a particularly unsatisfactory infill development which, in our view, should be avoided as it can hardly be said to articulate with or complement the properties on either side.

We refer in paragraph 65 to some examples of new build which could be used as examples. Further examples are illustrated in paragraph 129.

76. We are extremely worried that such illustrations will be taken as indicative of what is considered to be “good” design, accepting again that some people may think it is. Either a broader range of illustrations needs to be given or, and this may be preferable given the size of the document, all illustrations should be removed. If illustrations are to remain, a caveat should be given that they do not necessarily represent best practice.

PART TWO – SPECIFIC POLICY COMMENTS

5 HIGH QUALITY DESIGN

QD1 Delivering high quality design in Lewisham

77. We support **QD1.A** to **QD1.D**.
78. **QD1.H** The design of a new development should pay attention to any impact on traffic flows and volumes in the surrounding neighbourhood. Particularly where parking is limited the design must ensure it does not impact adversely on the amenities of the surrounding area through overflow parking.
79. **§ 5.6** states “We will work positively and proactively with development industry partners and other key stakeholder [sic] to secure the delivery of high quality design in Lewisham.” The Glossary does not define key stakeholders. The definition should make it clear that existing residents are key stakeholders. See our comments the need for the involvement of communities at paragraph 11 and paragraphs 260 to 263 and 266 to 267)
80. **§§ 5.8 – 5.9** We note that, in the context to our concern above, there is no commitment in this paragraph to re-starting the Amenity Societies Panel when funds are available. Whilst it is necessary to have professional design experts it is also just as important to engage with local residents’ groups (who should also be regarded as key stakeholders) and who have unparalleled detailed knowledge of their local area.

QD2 Inclusive and safe design

81. **QD2.C** The objections to gated developments also apply to blocks of flats which are simply gated vertical developments. Either gated developments should be allowed, or policies should be required to ensure that, particularly, larger blocks of flats are open. Examples abound at present where such blocks restrict or prevent access (vide **QD2.B.b**) and create a closed community which does not engage with the surrounding area. Such access would be particularly important for example where a development includes roof gardens when considered in the context of “*green open space*”.
82. It is unclear as to how the 10% criterion in **QD2** will work on small developments. Does it apply to flat conversions? How does it work in Conservation Areas where the overriding need would be for conformity to the existing housing stock which may be Victorian and not able to meet this criterion? There needs to be clarity on this in order to prevent issues on appeal. We would suggest that the 10% criterion should not apply to flat conversions and that design and heritage issues must take precedence over other considerations within Conservation Areas and for other Heritage Assets unless the law provides otherwise.

QD3 Public Realm and connecting places

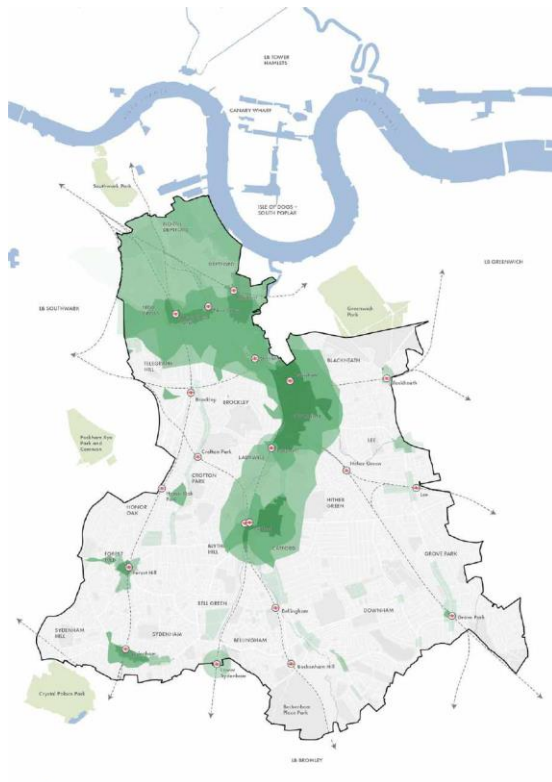
83. **QD3** should ensure that public realm improvements look attractive and integrate into the surrounding streetscape.
84. To meet the aspirations of the Vision that Lewisham should be a desirable place to live there is an overriding need to pay attention to our existing public realm as well as to new development.

85. In order to address the points in paragraphs 83 and 84 in detail, the Council should prepare Streetscape policies for the Borough which apply both to new developments and to the works carried out on the public realm by the Council. The Borough had developed a Streetscape guide but this is no longer adhered to. An updated version of this should be introduced as soon as possible, with the commitment to do so referenced in the Local Plan.

QD4 Building heights

The Hatcham Works site and adjacent Conservation Areas.

86. Our objections to high-rise buildings more generally are set out our comments about the type of development required to meet Strategic Objectives B3 and B4 and G16-19 in paragraphs 63 to 66 above.
87. We welcome **QD4.A** and **QD4.B** We do however not consider that the Hatcham Works site should fall within the areas considered in-principle for tall buildings, even if the principle of tall buildings is more generally accepted. The site is directly adjacent to the Hatcham Park Conservation Area and impacts on the Telegraph Hill Conservation Area and on the predominately Victorian high street. Tall buildings on this site would immediately contravene the proposed policy **QD4.A** in that they would not be appropriate in scale, taking into account the site's immediate and wider context, and also QD4.B in that they could not be sensitive to the surrounding area, would project excessively above the streetscape, would adversely impact on the surrounding area and would result in adverse impacts on the amenity of neighbouring properties.
88. We do not consider that High PTAL is alone a suitable criterion for determining where high rise buildings should be located without taking into account the present actual capacity of the transport infrastructure to cope with the increased traffic that would be generated. Whilst we appreciate that capacity will change over time and that development plans are expected to address such issues, actual and projected transport capacity (and the capacity of other infrastructure to cope for increases in the local population) is a material consideration and **QD6** should reference this.
89. There is a clear conflict as regards the suitability for high rise buildings in this area and other policy considerations. This is no better evidenced than by a comparison between **Figure 5.2** (Suitability for high rise buildings) and **Figure 10.4** (Open space deficiency). (*The figures reproduced on following page.*)



90. An area which has a significant deficit of open space and is recorded as the most unhealthy in South East London (paragraph 27 above) can hardly be said to be “suitable” for tall buildings with the inherent presumption of more people per hectare.
91. With regards to the proposed Hatcham Works site, there is an inherent conflict in the proposed Plan between the site, which is identified in **QD4.E**, and the policies in **QD4.A** and **QD4.B**. **QD4.A** requires any building’s scale to be appropriate, taking into account the wider context, and **QD4.B** requires any building to preserve or enhance the significance of heritage assets. Unless the policy is meant to be read that “taller” buildings are not “tall buildings” it is impossible to reconcile the in-principle acceptability of a tall building on the Hatcham Works site with wording of **QD4.A** and **QD4.B**. The illustrations below from the proposed development by Sainsbury’s/Mount Anvil (2019-2020) show the impact that such development would have had on the Hatcham Conservation Area and the Telegraph Hill Conservation Area. Whilst that development application was withdrawn, the requirements set out for the site in Part Three of the Plan would suggest at least one tower of comparable height.

92. We do not understand why Hatcham Conservation Area and the north-east quarter of the Telegraph Hill Conservation Area are included within the area of “Tall Building suitability” in figure 5.1 according to the colouring on the lower scale on page 111 of the Plan. The areas are clearly not suitable for tall buildings which would be contrary to Policy HE2.B. The figure is confusing as it uses the same colours for high PTAL (see our comments on that at paragraph 88 above) as it does for the most suitable for tall buildings. The Conservation Areas should be scoped out of inclusion on figure 5.1.



93. The Tall Buildings sensitivity plan in **figure 5.2** is clearly incorrect. Hatcham Conservation Area and the north-east quarter of the Telegraph Hill Conservation Area are shown as less sensitive to tall buildings than the remainder of the Telegraph Hill Conservation Area. Those two areas though are ones from which any tall building at Hatcham Works would most visible (see the above pictures in paragraph 91 which dramatically illustrate this). Hatcham Conservation Area and the north-east quarter of the Telegraph Hill Conservation Area should be shown in the darkest purple whilst the remainder of the Telegraph Hill Conservation Area could be downgraded slightly as such towers would be less visible from those streets.
94. We accept that there is a separate consideration given to sensitivity in **figure 5.2** but we do not believe there should be an “in-principle support” for high rise development which would significantly detract from the built environment and appearance of the Borough’s Conservation Areas. We would propose therefore that sites where development of high-rise buildings would affect adjacent Conservation Areas (by reference to **figure 5.2** and sight lines) should be excluded from potential tall building development on **figure 5.1** as being unsuitable for tall buildings.
95. We would further note that the height of the buildings proposed in the Sainsbury’s/Mount Anvil proposals were one of the major causes of objection from residents. Our survey showed that 89% of respondents were against the overall proposals (77% strongly against) with the majority of respondents (57%) believing that any development should not exceed 6 storeys with 84% not wishing developments in excess of 10 storeys. Whilst we accept that the Sainsbury’s Mount / Anvil proposals were withdrawn and included a higher density than that set out in section 15 of this Plan for the Hatcham Works site (**page 603**), the proposed 912 net residential units will still require extremely tall towers well beyond those felt

suitable for the site by residents living in the surrounding area and affected by any development on the site. The full survey results are given in Appendix 2 to this paper.

96. In summary: By making such substantial changes to the local area, it arguably will also not reinforce community cohesion or integration and would also be contrary to Strategic Objectives B3 and G18.
- High PTAL alone is not a justification for tall buildings on any site
 - High-rise developments generally do not meet **Strategic Objectives B3, B4 or G16 to G18**
 - Significantly increasing the population of the area is ethically unacceptable until the issues of health and well-being are resolved
 - There is insufficient green space to support a significant increase in residential capacity in an area which is deficient in such space
 - The plan (**figure 5.2**) is misleading as to tall building sensitivity requirements as the area is extremely sensitive to such buildings and
 - The heritage of the surrounding Conservation Areas would be irretrievably damaged by the creation of such towers as the illustrations above clearly show.

The allocation of the Hatcham Works site for tall towers is contrary to **Strategic Objectives A1, D8, F13, F15 and G16**. By making such substantial changes to the local area, it arguably will also not reinforce community cohesion or integration and would also be contrary to **Strategic Objectives B4 and G18**.

97. For all the reasons given above we do not believe that the Hatcham Works site is suitable for tall buildings and believe it should be scoped out of **figure 5.1**. The indicative development capacity in the site allocation on **page 603** would need to be reduced accordingly
98. For other reasons (not related to height) as to why the Hatcham Works site could be better used to improve the lives of residents and to meet the Borough's vision of a welcoming series of communities, see our proposals on the use of the site as retail (paragraphs 169 to 171) and creative employment (paragraph 157), together with low-rise accommodation and a park (paragraph 48). These move the current designation of High Street into a more pedestrian and cycle-friendly area than the A2 will ever be and address the lack of green space and health issues identified, but not resolved by, the proposed Lewisham Plan.
99. For other comments on the Hatcham Works site allocation please see our comments in paragraphs 245 to 254.

QD4 more generally.

100. **QD4.B.a** uses the words "*exceptional design and architectural quality*" which are basically unclear. Something can be exceptional by virtue of being exceptionally bad or exceptionally different. We would suggest the paragraph should read "*are of an exceptionally good design and architectural quality*" which, whilst leaving it still open to the subjective interpretation of "good" does clarify what is, we assume, intended.
101. **Q4.F** "Tall buildings will only be considered acceptable in-principle in the locations identified in **figure 5.1** as being appropriate for tall buildings." However **figure 5.1** does not identify locations as being "appropriate", it has a scale of "suitability". There is no guidance as to

how a scale of suitability might be used to define what is appropriate: something can quite suitable but totally inappropriate.

102. § 5.37 states that proposals will be “strongly resisted where they would result in unacceptable visual, functional, environmental and cumulative impacts that cannot be avoided or appropriately mitigated.” We do not understand how unacceptable features can be mitigated – the design of the buildings should be such as to avoid them entirely. “Mitigation” gives a loophole for argument which should not be permitted. The sentence should read simply: “proposals will be strongly resisted where they would result in unacceptable visual, functional, environmental and cumulative impacts.”

QD5 View management

103. We commented on inaccuracies in **figure 5.3** when it was first produced and note that those inaccuracies still remain uncorrected. It is not clear, as there is no explanation of the legend, what the different thickness in view lines and shading mean. Moreover, the major views from Telegraph Hill are simply wrong. There is a significant Westward view incorporating the whole of Peckham and around towards the southwest with Denmark Hill being clearly visible. The views need to be properly recorded in this figure.
104. We have previously requested that the Council include an expression of intent in their Plan to seek a London Strategic View protection from Telegraph Hill as the views are as good as, say, those from Greenwich and also have historical interest as the site of the early 19th Century optical Telegraph. We repeat that request here.

QD7 Amenity and agent of change

105. Large developments have a wide impact on the surrounding area. We are concerned that **QD7.A** is not drafted sufficiently widely in its wording “... as well as the amenity of neighbouring properties and uses” to take this into account. In development terminology “neighbouring properties” only relates to those immediately bordering the development site and quite clearly the effect on local residents of a large development is more than that. We would propose that “neighbouring properties” be replaced by “properties likely to be affected by the proposed development”.
106. Similar issues arise with regards to the wording of **QD7.B** and should be addressed in the same way.

QD9 External lighting

107. § 5.68 notes that “If not appropriately managed however, artificial lighting has the potential to become light pollution which can present physiological, ecological and other environmental issues. There are three main types of light pollution: ... light intrusion or trespass (the spilling of light beyond the boundary of the property or area being lit). All such pollution results in excessive or obtrusive light that may cause nuisance to the population, adversely impact on the amenity of properties and harms habitats and biodiversity”.
108. Whilst we support the policy, the harms so described also apply to internal lighting spillage such as that skylights and windows, in particular large bifold windows where they are poorly placed without consideration for neighbouring properties. We also hear considerable complaints from occupiers of first and second floor flats in this regard where a ground floor development has been allowed incorporating skylights.

109. We are also aware of areas which have been adversely affected by new developments, particularly non-residential buildings, where the large expanses of glass windows, illuminated at night, have led to an unacceptable change in the views from surrounding areas with the physiological impact referred to in § 5.68.
110. We consider, therefore, that policy QD9 should be widened to cover all forms of light pollution and not just that from external lighting.

QD10 Building alterations, extensions and basement development

111. We refer to our general comment in paragraphs 67 - 70 over the use of the word “support”. This is a particular instance, given the number of badly designed extensions that appear to be permitted under the SDG, where the use of the phrase “only support” is absolutely required.
112. It is extremely unfortunate that the illustration given in the draft Plan does not show a good example. The windows in the extension clearly do not respect the originals (modern possibly uPVC frame on the first floor far too wide for the window and a large plate glass window on the ground floor – whereas the original property, as can be seen, has smaller paned sash windows). This should not be used as an example for fear of setting a precedent. We would strongly urge you to find a better example and would be happy to provide you with some.
113. We note that much of the material previously in DM Policy 31 is now reflected in the SPG, although we consider that the SPG is too widely drawn, allows for some inappropriate development particularly within Conservation Areas and is urgently in need of further refinement.
114. We welcome the addition of new material on basement development and lightwells which have become a particular source of contention since the last UDP was introduced.
- There are, however, certain elements of DM Policy 31 which we consider still need to be reflected within this section of the Plan as follows:
 - Development proposals should respond *sensitively* to the character rather than *positively* (QD10.B).
 - The express statement that “Roof extensions on the street frontage of a building, particularly in a residential street will be resisted in favour of extensions to the rear of the building” made in DM 31.2b should be retained.
 - The requirement that any proposal should retain 50% of the garden space (included in DM Policy 31.2c) is not expressly repeated in the SPD and should therefore be included in QD10.
 - The requirements in DM 31.2d are not expressly repeated in the SPD and should therefore be included in QD10: “additional or enlarged windows, doors and other openings, should be in keeping with the original pattern, and in the case of a roof extension should reflect the existing alignment of the windows. Replacement windows where controllable by the Council should closely match the pattern of the original windows. The repair of original windows will be encouraged.”

QD11 Infill and backland sites, back gardens and amenity areas

115. We strongly support policies **QD11.F** and **QD11.G** as regards back gardens.
116. We believe the Council should continue to resist back garden development particularly within the north of the Borough where there are higher levels of air pollution and generally less green space than in the south of the Borough.
117. Gardens in Inner London make a significant contribution to the character of London; they promote inclusiveness by making inner London homes attractive to those who would otherwise live in the suburbs or the countryside; they provide space for urban wildlife; they add “lungs” to the city removing pollution; and, above all, they make London a desirable place to live. As the GiGL green space map shows, garden space contributes significantly more to overall greening in Inner London than in the outer boroughs and more than public parks and spaces^v.
118. On the consequences of the loss of green space, David Elliott, Commissioner on the London Sustainable Development Commission has written:
- “Children are heard, but not seen – retreating to their bedrooms with screens and headphones. A reduction in outdoor activity is linked to obesity and heart disease crises. Levels of depression seem to go viral, costing immeasurable losses to work days and productivity.
- “The loss of green spaces that had created a sense of place, a connection to the past and spaces for people to come together, has catalysed a fragmentation of communities. House prices collapse as people scramble to move out of a city no longer seen as a place that can provide conditions for decent, or acceptable, living...”^{vi}
119. Public green space is necessary, but it does not supplant the need for private garden space which has its own benefits. Private gardens create quiet oases where families can converse, study, or play in safety. Garden and allotment spaces provide the ability to grow food. The COVID-19 pandemic has further brought home the need for private space for exercise and contemplation particularly when homes themselves are getting smaller.
120. Create Streets^{vii} research has shown that children are more likely to undertake outdoor activity when they have private space in which to do so. They conclude more generally:
- “People who live in greener neighbourhoods tend to have better cardiovascular health and lower levels of stress regard less of their socio-economic status. The greater the biodiversity in those green spaces, the larger the benefit to or psychological well-being. Participating in activities such as gardening is emerging as a promising treatment for mild to moderate depression.”
121. The above considerations need to be given more weight within the Explanation section for **QD11** (§ 5.80 through § 5.92) and in addition cross-reference should be made to policies **GR1** and **GR5** (see paragraphs 184 to 197 below) and to how private garden space contributes to the achievement of **Strategic Objectives G16 and G17**.
122. Where development is to be permitted under policy **QD11.G** (in exceptional circumstances), there should be limits on the maximum amount of the site which can be developed, taking into account not only the immediate adjacent residential properties but also the overall amount of green space per capita in the surrounding area.

123. Policy **QD11.B.a** requires any permitted development to “*respond positively to the ... local character*”. It is wholly unclear what this means and it could be widely interpreted. We would prefer the policy to require that the development “*is sensitive to and conforms to ... local character*”. The majority of the considerations on Alterations and Extensions are also appropriate to controlling infill and back garden developments as these have the potential for similar impact and, indeed, may be identical except for ownership and a small separation between the buildings. We believe therefore that the general considerations in **QD10** and in the SPD on Alteration and Extensions need also to be incorporated as protections within **QD11**. There is little point in providing protection from a poorly designed extension if the same criteria are not used for assessing a development on an adjacent infill site.
124. Policy **QD11.D** states that infill development can include development “*on street corners*”. However the definition of “infill development” on **page 822** states that it is “*Development that takes place on vacant or undeveloped sites between other developments and/or built form.*” A corner site is not between other developments and built form. There is a danger here that corner sites which form gardens to houses, such as on side streets, will be regarded as “infill” sites for the purpose of this policy. Such sites need to be protected both for the green credentials and because they contribute, by virtue of their position and prominence, to the special characteristics of each area. The policy should be absolutely clear that corner sites will only be included where they are not garden space and where they were previously brown-field sites.
125. In respect of policy **QD11.F** we would note that gardens also play a role in air pollution reduction and in general health considerations. As stated above, clarity needs to be provided where a site is both on street frontage and/or street corner and is also a back garden – as is frequently the case on residential corner sites. We believe, for all the reasons provided, that QD11.F should take precedence over **QD11.D** (i.e. it is a garden site first and an infill site second) but this is not clear. It would appear that this is the case from **§ 5.81** which only refers to gardens at the side of houses as “infill”, but this should be made explicitly clear.
126. Moreover, we believe that gardens to the side of houses should not, as a matter of principle, be regarded as infill sites (**§ 5.81**). Such gardens can be as important as back gardens to the health and well-being of the Borough’s residents for the reasons set out above in paragraphs 115 to 119. We accept that some infill of these sites can contribute to the provision of additional housing, although at the expense of other strategic objectives, but consider that this should be looked at on a case-by-case basis. Side gardens therefore merit a separate policy section within **QD11** which should, at a minimum, provide that where a side garden functions as a back garden (e.g. on corner properties in a triangle of roads), it should be afforded the same protection as back gardens.
127. We support the principle of the definition in **§5.81** of [Back] Garden Land as “*private amenity areas that were the entire back garden to the rear of a dwelling or dwellings as originally designed*”, which we take to provide protection in the event of the owner selling off part of the original garden and the new owner of that element claiming that this is no longer garden land. However, to afford protection to side gardens (and indeed front gardens), as suggested above, the definition should be widened to read: “*private amenity areas that were the garden to a dwelling or dwellings as originally designed.*”
128. **§ 5.83** states that “Not all infill, backland, garden land and amenity area sites will be considered appropriate for new development, or for certain types of land uses.” This seems

in conflict with policy **DQ11** and should be more clearly phrased to state “Not all infill sites will be considered appropriate for new development, or for certain types of land uses. Backland, garden land and amenity area sites will be considered for new development and land uses only where these conform to the stricter requirements of the policy”.

129. We are less than convinced that the illustration on **page 138** provides a good example of design. We appreciate that this is subjective but suggest the Plan could be more even-handed by showing a mixture of these very contemporary designs with designs which respect the architectural heritage of the Borough. Two examples of the latter, both built as flats on infill/brown sites during the currency of the existing UDP within our Conservation Area are shown below and we are sure there are further examples that the Plan could illustrate:



The new build properties, both flatted accommodation, are the end terrace property on the right of the first illustration (Arbuthnot Road)⁵ and the detached property on the left of the second (Pepys Road).

QD12 Shopfronts and QD13 Outdoor advertisements, digital displays and hoardings

130. Shop fronts within Lewisham have significantly deteriorated over the years with an unsightly display of varying facias, signage and a proliferation of garish colours and lighting. We therefore strongly support these policies. The pictures immediately below of the New Cross Road show how the uniformity of the initial design of a row of shops can easily be destroyed by unrestrained development:



⁵ For clarity we would stress that we do not support the later rear extension to this property, to which the Society objected, and which is wholly out of keeping with the Conservation Area.

6 HERITAGE

General

131. We note that **page 154** includes concerns that have been notified to the Council about heritage issues. The concerns expressed over “*small works such as house extensions*” within Conservation Areas are not adequately addressed within the current SDG which needs revisiting. In particular we have considerable concern over the amount of demolition that is taking place of original fabric such as bay windows and the introduction of elements such as stylistically inappropriate large-pane bifold windows which the current SDG permits and, indeed, even illustrates as acceptable. The current SDG similarly seems powerless to prevent the introduction of increasing numbers of front rooflights into properties within our Conservation Area, despite our Area’s Character Appraisal specifically mentioning such additions as “*eroding the special characteristics of the area*”. We would urge the Council to include a commitment to revising and strengthening the protections given to all Conservation Areas over small works by a revision of the Alterations and Extensions SDG and further development of the various Conservation Area Character Appraisals where necessary.
132. We appreciate that the illustrations do not form part of the Plan, but it seems unusual that there is no illustration here of the Victorian properties which form the bulk of the Borough’s townscape (outside Lewisham Centre) and are a key element in the majority of the Borough’s Conservation Areas. This heritage contributes so substantially to its character and the built environment except in the area around Lewisham station and the south eastern neighbourhood (primarily post-war with its own special characteristics). This needs addressing in the final Plan to avoid the impression that these are being forgotten or demoted in importance amongst all the modern high-rise buildings which are so copiously illustrated in the present draft.
133. We contributed in 2019 to the Council’s consultations over a general heritage strategy. We were informed at the time that this would contribute to the Borough’s formulation of its Local Plan. It is regrettable, therefore, that the Council’s work on this project ceased as a result of COVID-19 and we trust, as we are informed, that it will recommence during Summer 2021 and will inform the next version of the Plan before the document is finalised.

HE1 Lewisham’s historic environment

134. **Policy HE1.A.a:** The implication of the drafting of **§ 6.4** (“*Our expectation is that community and special interest groups, key stakeholders and the development industry ...*”) is that community and special interest groups are not key stakeholders. It should be redrafted as “*Our expectation is that key stakeholders, including community and special interest groups, and the development industry...*”
135. The reference material included in **§ 6.5** should include Conservation Area Character Appraisals. Our understanding is that these are material consideration, but we find that they are often omitted from consideration both in developers’ applications and in the written reports on those applications prepared by Council Officers during the planning process.
136. We strongly support the statement in **§ 6.10**: “Where there is evidence of deliberate neglect or damage to a heritage asset, the current condition of the asset will not be taken into account in planning decisions.” We welcome this statement but feel this should be wider,

requires clarification and should be included in a Policy in order to give it more weight and not as mere Explanation (see our comment at paragraph 74).

137. **Policy HE.1.B:** This policy sections refer to the “*historic environment*” which is referred to in § 6.1 and seems to have a wider context than the remainder of explanatory text which refers to “*heritage assets*”. We consider that the policies on preserving the historic environment should be wider than just heritage assets, although we welcome the protection given to heritage assets. The heritage of the Borough and the appeal of the Borough as a place to live can be damaged by poor development of historic assets outside those defined as heritage assets as the following illustrations of Endwell Road illustrate:



138. The more general planning policies for development of sites outside heritage areas, where they affect the historic environment, need to be given due consideration in this section as a guide to what constitutes more general good design-led development.

HE2: Designated Heritage Assets

139. We are generally supportive of this policy which covers the existing protections and adds a few such as mentioning gardens, fenestration patterns, ornamentation and views from the private realm.
140. It is unclear to us from the definition on **page 822** whether a Conservation Area is regarded as a single heritage asset or a collection of heritage assets for the purposes of this Plan. If a Conservation Area is regarded, as simply a single Heritage Asset, which we think might be the reading from **HE2**, then it might be argued that neglect or damage to a single building does not constitute neglect or damage to the whole area and hence to the “*heritage asset*”. We do not believe this is right. Neglect or damage to a single building is as much to be deplored as neglect or damage to the whole. The Plan should make it clear that a heritage asset such as a Conservation Area is also to be regarded as a collection of individual heritage assets
141. We consider that the new wording in policy **HE2.B.b: supporting** developments that “*so as not result in an adverse cumulative impact on the special characteristics of a Conservation Area, even if the development in isolation would cause less than substantial harm*” is less protective than the current UDP wording which it replaces which **refuses** development which “*in isolation would lead to less than substantial harm to the building or area, but cumulatively would adversely affect the character and appearance of the conservation area*”.

We imagine that the two are meant to be functionally identical, but this is not clear and we would wish the Council to retain the existing wording.

142. We also note the use of the phrase “*special characteristics*”. This was also used in the existing UDP although alongside references to “*character and appearance*” and with clarification that it included “*buildings, spaces, settings and plot coverage, scale, form and materials*”. In order to avoid debate over what such characteristics might be, we suggest that reference should be made to “special characteristics” having to take into account consideration of buildings, spaces, settings and plot coverage, scale, form and materials and consideration of any Conservation Area Character Appraisals (not merely the broader area characterisation studies carried out by the Borough). We also believe that the Conservation Area Character Appraisals need refining and more detail in order to protect Conservation Areas as intended. Such refinement, which might alternatively be included in Design Codes, should include, for example, the type of sash windows and window horns, the style of lintels, doors and roof ornaments, the type of tiling, brick work and brick bonding. A more detailed approach would make it clearer to applicants exactly what is expected and reduce the level of work that the Planning Department needs to do on each application to ensure it meets the requirements of heritage conservation.
143. It is unclear what the interaction is between policies **HE2.B** and **HE2.C** where a proposal includes both new development and retention of existing elements; **HE2.C** would be better worded to read “*Proposals for the retention of ...*”.
144. Policy **HE2.C** is capable of alternative readings and we would suggest it would be improved and strengthened by the following deletion: “*Proposals involving the retention, refurbishment and reinstatement of features that are important to ~~the significance of a~~ Conservation Area will be supported.*”
145. We note that DM 36.5 and DM35.6 do not seem to be included in the proposed Plan.:
- 5. The Council will encourage the reinstatement or require the retention of architectural and landscaping features, such as front gardens and boundary walls, important to an area's character or appearance, if necessary, by the use of Article 4 Directions.*
- 6. The Council will require bin stores and bike sheds to be located at the side or rear of properties where a front access to the side and rear exists.*

We strongly believe that these should be included in order to meet **Strategic Objective F15**. DM 36.5 provides a lever which can be used to negotiate improvements to proposals in line with Explanation in **§ 6.19DM36.6**, whilst detailed, seeks to bar one of the worst issues currently marring the appearance of Conservation Areas.

HE4: Enabling Development

146. We consider the policy heading to be confusing and that it gives a wrong impression of what is intended. We would suggest that it would be better worded as “Securing the future of heritage assets”
147. **Policy HE4** seems to use “Heritage Asset” in the confusing sense we outlined in paragraph 140. We are unclear as to whether it means that a Conservation Area is a single “heritage Asset” or that each building in a conservation area a separate heritage asset (or possibility only those buildings within the Conservation Area which contribute to the special characteristics of the Conservation Area). The ambiguity needs removing in order to ensure

sufficient protection for individual buildings (assets) within a Conservation Area which, whilst not being of significance in their own right, contribute to the overall character of the Conservation Area.

148. A reminder of the prohibition in **§ 6.10** (referred to in our paragraph 136) concerning neglect or deliberate damage should also be made in the Explanatory notes to this section.

7 HOUSING

H02 Residential conversions

149. The Characterisation Study defines areas on a spectrum of sensitivity to change, based on local character and taking into account factors such as existing urban grain, historic evolution, building typologies, and spatial strategic growth and regeneration priorities across the Borough. However communities are equally important if the vision of Lewisham as *“a place where all generations not only live but also thrive ... a place that people want to visit and live in, and where they choose to stay and enjoy a good quality of life”* (page 48) is to be achieved and if the Borough is to meet the **Strategic Objectives** set out in **G16 to G19**. Indeed, preservation and support of local communities is fundamental to addressing the wider determinants of physical and mental health and improving the well-being of the population (**Strategic Objective G16**) as noted in paragraph 27.
150. Before the previous UDP, which put a more effective hurdle of subdivision than is now proposed, we saw an increasing level of conversions of properties in the Conservation Area into flats with up to 50% of the houses being so converted in most streets. These flats were predominately taken up by single people or couples without children or by let out to students at Goldsmiths College: the social fabric and community of the area was noticeably eroded by the new, mainly transient population, those single people or couples occupying the flats tended to move, often reluctantly, away from the area once they had children. The policy entirely eroded the Council’s aspirations, as far as our area was concerned, for people to remain in an area for a significant time. The general effect was to push up the prices of the remaining houses both as developers competed to buy then and because those who wished to buy a complete house found the pool of possible properties diminishing. The situation was developing whereby there were only cheap flats and very expensive houses and nothing in between, with no migration path between one and the other and the consequential departure of residents from the area in search of cheaper family homes. Worried about this trend and its effects on the community, the Telegraph Hill Society was instrumental in the campaign for a block on further flat conversions which was ultimately introduced in the last UDP. Since the introduction of the UDP policies this trend has reversed to some extent with flats being converted back into houses and no new subdivisions.
151. Were such subdivisions allowed again, we believe the trend previously observed towards the erosion of the local community would recommence. Given the importance of local communities, and particularly the vibrant community in Telegraph Hill, we are therefore deeply concerned with the proposed introduction of this policy.
152. More generally flat conversions of even larger properties exchange quality larger family homes for poor quality smaller flats and homes, which simply by virtue of being conversions cannot be as good as purpose-designed flats. Few modern developments in Lewisham include replacement houses with 4 or 5 bedrooms. Equally few new developments

incorporate houses with gardens as, in order to maximise density, most are flats in tower blocks. The policy will therefore reduce the supply of larger houses with gardens and push the prices of those up further still and out of the range of even more families.

153. We would further note, as we have stated in paragraph 29, the impact of COVID-19 has permanently changed the way people work, and many more people will now be working from home for ever and hybrid mixed home/office working is projected to become the norm. Occupiers will expect their properties to be usable for this purpose and we anticipate that will significantly increase the demand for extra space and extra rooms. A 130 sq m property will not be sufficient to meet the demand for a family size accommodate with one or two people working partly or wholly from home.
154. We strongly believe, therefore, that the existing policy of resisting flat conversions in general should be retained.
155. If, despite our strong objections, the proposed policy is included, the minimum level for the size of properties which can be converted should be set higher (150 sq m) or there should be a limit for the maximum amount of flat conversion allowed in any area (or maybe street) set at, say, 50%. If a Borough-wide policy like this is not acceptable, then at the very least, Conservation Areas should be exempted from the conversion policy in order to prevent the type of issues we have highlighted above in our area.
156. If, despite our objections, an area-based limit is all that remains in this policy, we want it noted that, since additions such as loft extensions etc. add to the space/area, there is an opportunity for developers to progressively get around any remaining protection by first adding an extension, thereby increasing the gross internal floor area to above 130sq m. To prevent this “existing dwelling” should be replaced by “original dwelling”.
157. With respect to policy **HO2.E**, we have examples of where houses suitable for families have been turned into HMOs and then the HMO turned into flats, the latter being justified because the definition in the existing DM3 and the proposed **HO2.E** refers to the “conversion of a single family house/dwelling”. HMOs can be easily converted back into single family dwellings whereas flats cannot. We believe that the wording now used which includes “or self-contained unit with 3+ bedrooms” would scope in most HMOs into this policy. If this is not however the intention, the policy should re-written so as to ensure HMOs are included within the ambit of this policy.
158. We accept that policy **HO9.A** seeks to resolve the issue by not allowing larger housing to be converted into HMOs. However (a) conversion into an HMO only loses housing for single family homes on a more temporary basis than flat conversion, and only allows it because policy **HO2.E** is drawn in such a way as not to preclude HMOs being converted into flats, and (b) the wording of **HO9.A** is more widely drawn than the wording of policy **HO2.E**. So, for example, at present a family house could be turned into an HMO if it complies with policy **HO9.A** and then turned into flats without the provision of a family sized unit because **HO2.E** does not apply.

HO8 Purpose built student accommodation

159. In refusing an application for purpose-built student accommodation (PBSA), consideration needs to be given as to where students might alternatively live. We have experience locally, prior to the increase of PBSA by Goldsmiths, of developers converting houses into flats specifically for student accommodation purposes where they could obtain higher income

levels, thereby reducing properties available for long-term residents of the Borough. This effectively stopped with the introduction of the current policy barring flat conversions and the development of cheaper more suitable student accommodation blocks in the area. Care needs to be taken, however, to ensure that, if HO2 on flat conversions is relaxed despite our objections and sufficient PBSA is not available, this damaging trend does not recur.

160. § 7.78 discusses the reverse case where the development of PBSA would compromise the delivery of local housing, but not the situation described above where the lack of PBSA compromises the retention of existing local housing. HO8 and the explanatory paragraphs need to document how this situation will be avoided.

HO9 Housing with shared facilities

161. We refer to our comments on policy HO2.E in paragraphs 157-158. It is unclear as to whether interaction of this policy with HO2.E prevents (as we believe it should) the ultimate subdivision of properties into unacceptable units, such as flats without family accommodation.

8 ECONOMY AND CULTURE

General comment

162. Paragraphs in this section of the draft Plan are no longer numbered. This needs correcting.

EC2 Protecting employment sites and delivering new workspace

163. The area around New Cross and New Cross Gate has lost a considerable amount of light industrial and other workspace in recent years, which is unfortunate considering the level of creative industries which could potentially surround Goldsmiths. (Reference to this is made on page 262.) The area currently around New Cross Gate station could be re-designated as a Mixed-use Employment Location (MEL) to redress this loss. We note that this site is included within the designated District Town Centre of New Cross (table 8.2) and Policy EC12.A adopts a “town centres first” approach to considering the location of retail, commercial, leisure and cultural uses. This definition could encompass workshops for creative industries and shared workspace accommodation for smaller businesses, which would be appropriate to the area, although not larger industrial employment which would not.

EC12 Location of new town centre development

164. Policy EC12, which seeks to “ensure that all efforts have been made to direct new development to existing centres” (page 290), is incompatible with the requirements to reduce car usage. New development should be directed towards the locations which ensure that facilities will be within walking distance of their potential users.
165. The COVID-19 pandemic has also questioned whether developments which crowd people into central areas for shopping (or work) are appropriate going forward.
166. These considerations imply the need for a more spread-out provision of shopping facilities than are currently available, rather than a more concentrated approach, and also a preference towards smaller retail units rather than larger format retail schemes.
167. The Explanation on page 286 states that Lewisham Town Centre benefits from excellent public transport links. However it has no direct access rail links from the western side of the

Borough (New Cross Gate through Honor Oak and Sydenham). The Catford Major Centre is also poorly linked, leaving the western side of the Borough's use of Lewisham centres largely reliant on either car or bus.

168. The development of the District and Local Centres and development of out-of-centre facilities such as corner shops is particularly important in such areas.

EC14 Major and District Centres

169. Whilst New Cross Gate is designated as a District Centre, the provision of shops and facilities has considerably reduced over the years with the closure of all banks, the post office and a range of local shops leaving the community effectively with only a food shopping centre, one discount clothes shop, one bookshop and no significant electrical or other retailers. The closest general stationers, for example, is now at London Bridge. Plans to encourage a wider range of shopping facilities across the Borough need to be addressed in the Local Plan if the goal of reducing road traffic is to be achieved.
170. For the reasons explained in our comments on policy **EC12** we are not convinced that policy **EC14.D** is appropriate. The Primary Shopping Area for New Cross Gate is along the A2. This will be, for many years to come, the least attractive area in which to shop. Whilst seeking to retain such vibrancy as can exist along the main road, the development of shopping areas to the side of the "Primary Shopping Area" would be beneficial both to the area as a whole and to the shops on the Primary Shopping Area.
171. In our view, there would be considerable merit in designating the Hatcham Works site as the Primary Shopping Area for future development as it has the capacity to create a better local shopping experience than the A2 if sensitively developed (see paragraph 163).
172. Policy **EC14.D** requires that non-A1 use must attract visitors and generate activity; we feel this is over restrictive. There can be no objection, in our view, to having commercial, office or residential units above A1 usage, provided that the ground floor is in A1 use. Indeed, much of the existing Victorian streetscape of the area is based on this layout.
173. We welcome the statement in policies **EC14.G**, **EC15.C** and **EC16.B** that proposals for residential units on the ground floor level or below within designated shopping areas will be resisted.

EC19 Public Houses

174. This proposal has our strong support.
175. However, policy **E19.C** should also include, where a public house is in or adjacent to a cultural quarter as identified in **EC18**, a requirement that the cultural facilities of the public house are retained. We have seen a number of instances recently where proposals have been made, and in some cases accepted, for the replacement of a public house without the attached performance space which was a feature of the original public house: where possible this loss must be resisted. Such space and mixed use is essential for the commercial viability of the public house and enhances the variety of such community assets in any area.

EC20 Markets

176. The explanation (**page 316**) indicates that the word "markets" encompasses street markets, specialist and farmers' markets. If that is the intention, then the explanation and policy appear to require that farmers' markets should also apply the "town centre first" principle.

We would consider this to be wrong: farmers' markets arguably are best placed where there is no local centre, thereby ensuring they do not detract from the town centre markets, allow the local population to access the produce without having to travel to a town centre, and have their financial viability assured, with their higher priced produce. The farmers' markets in Brockley and Telegraph Hill have been successful because they are not located in a town centre. Policy **EC20.B** needs rewording to exclude farmers' markets.

177. More generally we have concerns that Policy **E20** is over-restrictive. Whilst we understand that the Council wishes to preserve the vitality of town centres, local markets can provide residents with the produce they require without the need to travel into town centres. In the light of the need to reduce car usage, markets should be encouraged across the Borough and not limited to town centre sites. In such cases it would also seem that the best places to encourage such markets would be where there was not good public transport, given the difficulties thereby of travelling into town centres by car. Policy **E20.B.c** would perversely seem to encourage the reverse.

9 COMMUNITY INFRASTRUCTURE

General

178. New and enhanced community infrastructure will clearly be needed in order to support any population growth or, in certain areas, to meet the Borough's Strategic Objectives for the existing population irrespective of such growth. However, the built infrastructure alone is pointless unless there are the resources to staff and run the facilities provided. Without those resources any new development will disadvantage existing residents, not meet the needs of new residents and fail to meet the Council's Strategic Objectives.
179. We appreciate that at present CIL and s106 cannot be used to run such revenue-based resources and therefore the Council should only allow development to proceed where it is certain that service providers, such as the NHS, have the resources available to staff and run the facilities. The Council, in the Plan, should also, in our view, express an intention to lobby Government to change the rules such that such facilities can be provided and maintained out of CIL and s106 monies.

CI2 New and enhanced community infrastructure

180. **Policy C12** must make it clear that the design principles in policies **QD1** to **QD13** also apply. The current draft seems to read that proposals will be supported provided that policies **CI2.A.a** to **CI2.A.f** are met regardless of how bad the design might be.
181. No consideration is given to car usage in policy **C12** other than reference to adverse impact in **CI2.A.f**. Whilst it is understood that non-car usage should be encouraged, it must be expected that a proportion of the users, especially for play-clubs, medical facilities, leisure facilities, theatres, cinemas and other performance space, will use cars. Indeed, until there is wider provision of safe public transport such facilities, although desired, may not be financially viable unless car parking is considered, even if it is only provision for dropping-off and picking-up. We believe this issue should be addressed in the Plan.
182. As regards siting of community infrastructure, consideration needs to be given over the 20-year length of the Plan to improving decentralisation. Whilst fewer but larger schools, leisure centres and medical facilities reduce costs and provide a wider range of services, they also make access for the elderly, infirm and those without cars more difficult and increase

car usage for those who do have them. In particular, residents (if they do not have a car) are less likely to use leisure facilities unless they are within a reasonable walking distance of their homes – 15 minutes is generally accepted as a target distance to be achieved. A move towards a more distributed provision of tiered services should therefore be planned over the life of this Plan in order to meet **Strategic Objective G18**.

CI3 Play and informal recreation

183. Amenity space should be provided with sufficient sunlight. Current planning legislation permits high-rise developments to overshadow public open space such that 50% of an outdoor amenity space need only have a minimum of two hours direct sunlight a day at the equinoxes. This is clearly insufficient for public health purposes given the known benefit of sunlight exposure (the more so for those with BAME ethnic origins). We believe the Council should expressly require more stringent provisions, committing to a minimum of six hours direct sunlight at the equinox for parks, playgrounds and other amenity space.

10 GREEN INFRASTRUCTURE

GR1 Green infrastructure

184. We are pleased that the Council recognises the advantages of back gardens in policy **QD11** (although its protection for other garden space should go further). However, there is little mention in this section of garden space, despite garden space contributing heavily to our green infrastructure and the aspirations for a greener city.
185. There is considerable research (refer to paragraph 117 et. seq. above) that private garden space brings significant benefits to residents. In addition to contributing to urban greening, it provides space where children can safely play whilst the parents are working in the house (a factor found important during the COVID-19 pandemic and which will become increasingly important if homeworking continues as a trend), a more secure relaxation space for adults than can be provided in public open space and also the capacity for food growing (see our comments on **GR5** below).
186. We consider that the proposed Plan needs to explain the place of gardens as part of the green infrastructure and to promote the benefit of private garden space within new developments as well as public garden space.
187. As we have noted elsewhere, there is considerable confusion throughout this section, including **figures 10.4 and 10.5** as to “open space” and “green space”. The section needs reconsidering as to where each of these terms is appropriate. In general, there is no justification for referring to “open space” in a policy section on “green infrastructure”.

GR2 Open space and Lewisham’s green grid

188. Policy **GR2** requires developers to provide “open space” however this can still result in the loss of green space as the two are not synonymous as explained above. GR2 requires redrafting such that the policy preserves or increases both open space AND green space and resists the loss of open space, including green space.
189. Policy **GR2.B** refers to “development proposals, particularly those located within areas that are deficient in open space”. The scale of new developments, particularly in those areas where tall buildings are deemed suitable, require additional considerations to ensure that these areas do not become more deficient in green space. To put it bluntly, adding, for

example, 2 acres of new green space for 1,000 new homes is likely to reduce the amenity as shared by all new and existing residents of the area even though it is on the face of it an increase in green space. The Council's policy should ensure that, in any local area, a new development does not result in a significant reduction of green space per person and should establish a base-line of minimum acceptable green space per person as a target for 2040 in order to raise areas deficient in green space to an acceptable level and to ensure that every resident continues to have a sufficient level of local green accessible space. The figures for this policy can be based on those on the work done in the Lewisham Open Spaces Assessment (2019).

GR3 Biodiversity and access to nature

190. As the draft Plan explains in the introduction to this section on page 355 and as we have referred to in paragraph 21 above, gardens are fundamentally important to biodiversity. The need for preserving garden space should be mentioned in this policy and cross-referred to policy **QD11**. Furthermore, the policies should make it clear that, in any new development, the overall impact on biodiversity should be considered: roof gardens, for example, cannot replace ground level gardens. Whilst they might provide a habitat for insects and birds they cannot provide a habitat for ground dwelling creatures such as hedgehogs or support the same variety of indigenous trees and shrubs.
191. There is insufficient emphasis in the providing for additional green spaces in areas of nature deficiency as highlighted in **figure 10.8**. Given that this covers the majority of the north of the Borough, high rise development can only be appropriate if there are policies which provide for the creation of additional parks and nature reserves. We would expect a Plan which is a "Vision" for 2040 to set out the minimum need for those additional parks, to identify where they would be built and to apply similar site allocation policies as has been done for other development.

GR4 Urban greening and trees

192. We do not consider that these proposals go far enough to provide for the Mayor of London's targets on 50% green cover nor to meet the Borough's aspirations on biodiversity (see our comments on **GR3**).
193. As regards policy **GR4.D** we note that "*development proposals should maximise the use of living roofs and walls*". As living roofs and walls are not typically part of the current urban typology we are unclear how they fit with the requirement of policy **QD1** and especially **QD1.D.h**. In particular, as regards Conservation Areas, it is unlikely that living roofs and walls will fit harmoniously with the appearance of the area. More generally, they are likely detrimentally to affect and damage the aesthetics of Conservation Areas by their incongruence appearance. Guidance is needed within the Plan as to how these sections inter-react, with a clear preference being given to preserving the character and appearance of any Conservation Area impacted by such proposals.
194. We note that open spaces have been created around many of the new developments and whilst in purely spatial terms they may provide some replacement for private gardens they remain generally unused except for dog exercise. Observation shows that they are little used by children or families for exercise and cannot have the same leisure or therapeutic benefits as gardens.

195. We note that there is no reference to street trees mentioned in this section although they clearly contribute heavily to the objectives of the green policies. We believe that a sub-policy should be added to **GR4** to protect street trees, to set targets for the increase in the number of street trees, and to control their removal. We appreciate that the majority of street trees are in the care of the Council and that this Plan primarily relates to development but see no reason why, if the Council is seeking to realise its “Vision”, the Plan should not set out the intentions and aspirations of the Council as regards the elements within its own care. The explanations in **§ 10.21** through **§ 10.25** would seem to apply as much to the trees in the care of the Council as to any others.

GR5 Food growing

196. Private gardens are also important for food growing and, anecdotally, have become more so during the COVID-19 pandemic. This use of private gardens should be mentioned in this policy and referred back to the need to protect such space set out in **QD11** as support for that policy.
197. Policy **GR5.B** encourages developers to provide communal garden space, and this may be the only possible way of providing garden space when tall towers or residential blocks are being developed. However, where smaller sites are being developed, developers should be encouraged to provide either private or, where this is not practical, communal garden space sufficient for the needs of all residents who require it.

11 SUSTAINABLE DESIGN AND INFRASTRUCTRE

SD1 Responding to the climate emergency

198. **SD1.B.e** as drafted states that the Council “will ensure that new development does not adversely affect the amenity of the local population and habitats, including by mitigating impacts on and improving air quality in the Borough”. This would be better phrased as a prohibition on such developments, and it must be recognised that you cannot “mitigate” an effect to the extent that it “does not adversely affect...”: mitigation is merely reduction of an adverse effect not its elimination. We would suggest: “The Council will not permit new developments which adversely affect the amenity of the local population and habitats...”.

12 TRANSPORT AND CONNECTIVITY

General comments

199. We believe that the Plan considerably misestimates the changes which will occur during the period of the Plan. Clearly demand will increase, if the increase in population for the Borough actually materialises; on the other hand, changes in demographics as regard home working and the attractiveness of the City centre may reduce radial transport, whilst increasing home delivery demand may affect cross-London and local journeys.

Connectivity

200. The key issue with connectivity within the Borough is that all public transport modes (and many of the main roads) are radial, severely limiting cross South London journeys. This is particularly apparent with the rail links. A journey, for example, from New Cross Gate to Dulwich might take 20 minutes by car but can take an hour by train or bus with the changes and walking involved and not all residents have the ability or desire to cycle.

201. A Plan which seeks to operate to 2040 needs to set out policies to alleviate these issues if it seeks to reduce car usage. Whilst we appreciate that the solution to these issues is principally in the hands of TfL, the Plan should set out the Borough's aspirations to seek solutions, lobby and make proposals for doing so.

Electric vehicles

202. We are not sure that the Plan adequately caters for a change to electric vehicles. We would see the demand for these, over the life of the Plan, and particularly with target of phasing out diesel and petrol vehicles by 2030, increasing substantially. Given the poor public transport connectivity on non-radial routes, we do not necessarily see car usage falling drastically, despite the current Mayor of London's ambitions.
203. We note **TR4.I** but consider that more thought needs to be given in the Plan for the need for electric charging points and garaged accommodation in new developments, especially given that such developments will have a life longer than that of this Plan. The Plan also needs to set out how local recharging points will be created in existing areas to facilitate the changeover of current residents from petrol/diesel to electric, particularly given that the overwhelming majority of properties in the north of the Borough do not have garage accommodation.

Vehicle usage in general

204. The Plan at **§ 12.26** states that *"it is recognised that that some residents and commercial uses in less well-connected areas will continue to rely on vehicles"*. As we have indicated in examples above, "well-connected" is a widely misused term. New Cross Gate, for example, is well-connected with certain areas but not well-connected to many destinations either west or east. Nor is it currently well-connected with a range of shops other than for food provision (see our comments on policy **EC12** at paragraphs 169 to 173). Furthermore, lack of connectivity itself is only one reason why vehicle use remains popular: cars are convenient. Public transport lacks door-to-door convenience and immediate availability. There is also the need to carry luggage and goods to and from a station or bus stop. These, together with the often wet weather in the UK, are some of the main reason why cars will remain attractive. Merely looking at PTAL ratings and the traffic network does not provide an adequately grained understanding of why private vehicles are still used even in areas which are apparently well-connected with public transport.
205. Pool cars may alleviate part of the problem but to suggest that it is only *"some residents"* in *"less well-connected areas"* who *"will continue to rely on vehicles"* demonstrates a significant misunderstanding of the issues.
206. In particular, permitting or encouraging developments of large numbers of units with no parking provision will ensure that **Strategic Objective D3** (to ensure that housing needs the needs of all age groups at different stages of life, particularly families) not be realized as the compelling need for families, for the elderly and others who rely on the convenience and safety of motor vehicle travel will need to move to homes better served for car use.
207. For businesses we would see an increasing need for vehicles as the demand for on-line and home shopping increases, with this, according to some retail estimates, being the major way of shopping in the future. Whilst this could see a decrease in the use of private vehicles for shopping trips, it will bring with it its own issues which this section does not adequately cover (see our comments on **TR5** below).

Pedestrians

208. Although there are policies supporting safe streets and pedestrian connectivity, gaps remain within the policies as the main elements of the policies set out in Plan only deal with new developments. This alone will not deal with the Strategic Objectives (in particular **Strategic Objectives G17 and G19**) set out in the Local Plan especially as the majority of streets are already in the Council's care. The Council should commit itself to re-introducing an updated version of its discarded Streetscape Manual and set out clear parameters for the improvement of poorly maintained pavements, excess signage, the placement of street furniture (including electric charging points) etc.
209. Policies also need to cover facilities to make walking easier for the less-abled and the elderly, including provision of toilet facilities and, critically, more street benches and places to rest. These policies should apply to new developments (as **QD3.G** does) but there should also be a commitment by the Council to put such facilities into other areas to meet **Strategic Objectives E11 and G17**. Merely requiring these features in new developments will not meet those objectives or make up the deficit in present provision.
210. We appreciate that the funds may not be available to do all these things in the immediate future, although some could be provided through s106 and CIL, but this is meant to be a Plan covering how Lewisham expects to evolve and meet residents' needs to 2040.

TR1 Sustainable transport and movement

211. A key policy should be that any proposals to reduce traffic flows which have an effect on the redistribution of traffic across other roads should not result in an increase in traffic on roads which are primarily residential roads, etc. It was said during the on-line consultation sessions that there was no intention to divert traffic away from the main roads onto residential roads, but extreme care must be taken in this respect to ensure that it does not unintentionally do so. If traffic calming measures result in the creation of bottlenecks or a significant slowing of the traffic flow, it is naïve not to anticipate that through traffic, assisted by sat. nav. technology, will find alternative routes through residential streets. Attempts to block off those alternative routes merely cause the same problem elsewhere. The issues with some of the COVID-19 related traffic schemes have graphically illustrated these problems, with some residents caused to suffer additional traffic, noise and air pollution, in order to "calm" other roads. The policy should therefore expressly set out that the Council will not approve schemes (development schemes, traffic "calming" schemes or otherwise) that result in an increase in traffic on residential roads and that any proposed scheme will be required to demonstrate by robust, well-informed and transparent modelling that there will be no such effects. The Council should further require before-and-after studies for any implemented schemes with a commitment to reverse or modify such schemes if the modelling proves to be incorrect.
212. Specifically, in the context of paragraph 211 and Telegraph Hill, the Plan includes a proposal to remove the A2 New Cross Road/Amersham Gyratory system and we would hope that the modelling for this does not show an increase in traffic already voiding the system by using Telegraph Hill to access the A2 from the A21. We understand that this issue is already a matter of discussion between the Council and the Malpas Road Healthy Streets Group. We will strongly resist any proposal to modify that traffic system which results in an increase in traffic through Telegraph Hill.

213. As noted in our general comments in paragraphs 200 and 201 above, a major shopping issue with connectivity from New Cross Gate and Brockley is the lack of cross-Borough rail links to Lewisham and Catford. At present, in effect, the Borough is divided into two in terms of access by rail. Whilst, for New Cross Gate the link to Lewisham will be improved when the first stage of the BLE is built, the other issues will remain. The creation of a linking station at Brockley would be extremely useful in this regard and is considerably cheaper to implement than the BLE. We have been lobbying for this for at least 20 years with no success to date.
214. We are pleased to note **TR1.I** which, given the concerns over the pre-pandemic levels of overcrowding on the platforms at New Cross Gate station, we strongly support.

TR2 Bakerloo line extension

215. We also strongly support policy **TR2.C** given the previous proposals to build on the Hatcham Works site which could, if they had gone ahead, have jeopardised the construction of the line.

TR4 Parking

216. The proposal for the Sainsbury's/Mount Anvil development at New Cross Gate generated considerable opposition from residents because of the lack of parking in the development. The creation of Controlled Parking Zones (CPZs) in the local area as a solution to this was felt to be an unacceptable burden to existing residents. It was felt totally unfair that a new development should impose a burden both in cost and inconvenience on existing residents, by taking away, without compensation, their rights to free street parking. The first sentence of policy **TR4.F** therefore gives us considerable concern as it appears not to take into account the impact of such a development on existing residents. Developers should pay for the disadvantages that their development creates for existing residents and this should be made clear in the policy.
217. The first sentence of **TR4.F** should be deleted and the remainder of that policy applied to all developments. If it is to remain, despite our concerns, it should be reworded to say *"Development proposals for car-free development will only be supported where they are located in highly accessible locations and locations well-connected by public transport with suitable capacity to service the demand from the development and it can be demonstrated will have no significant impact on the existing provision of on-street parking"* with **§ 12.24** modified appropriately.
218. The statement in **§ 12.24** "Consideration will be given to proposals where it can be demonstrated that a new CPZ will be in place by the time of the occupation of development." should be deleted. It provides a huge incentive for developers to seek to force through CPZs potentially in the face of opposition from residents.
219. Policy **TR4.G** on CPZs and/or the associated text should include a provision that CPZs will not be introduced without an appropriate and fairly conducted survey of residents' views. It should be noted that on at least two previous consultations about proposed introductions of a CPZ in the Telegraph Hill Conservation Area the overwhelming majority of residents who responded opposed such schemes.
220. Policy **TR4.H** relating to Permit Free developments needs to include a proviso that such consideration will take into account the potential impact on existing local provision of on-street parking as it is likely to cause over-flow parking issues.

TR5 Deliveries, servicing and construction

221. A number of retail studies suggest that on-line and home-shopping will increase dramatically and, post COVID-19 substantially faster than taken into the London Plan. To suggest, as **TR5.A** does, that cargo-bikes will be able to manage this growth is somewhat naive. The idea that Sainsbury's, Tesco or even the local electrical store will deliver by bicycle is not realistic. Even where the local store delivers by bicycle it is unlikely that their wholesalers would be able to deliver to them other than by motor vehicle.
222. Whilst **TR5** takes this into account there is nothing in this policy which facilitates or encourages the use of electric vehicles by shops and delivery firms rather than petrol/diesel. The policy should address this issue which is mentioned in the Explanation for **TR4 (§ 12.26)** but not currently included in the policy **TR5**.

TR7 Digital and communication infrastructure and connectivity

223. Having objected to a significant number of applications in the past for telecommunication masts in the Telegraph Hill Conservation Area which have been either inappropriately designed or inappropriately sited, or both, we welcome policy **TR7.D.f**.
224. The Explanation of the policy in **§ 12.40** states that the Borough is currently very limited in its full-fibre broadband connectivity and that the Council will work to improve this. However, this is not reflected in the policy itself. The policy needs to be modified to do so.

PART THREE

13 LEWISHAM'S NEIGHBOURHOODS AND PLACES

225. We have previously pointed out that the character area and neighbourhood shown for Telegraph Hill in **figure 13.1** is incorrect. The Telegraph Hill Conservation Area, and the former Haberdashers' Estate of which it forms part, stretches to the A2 and New Cross Gate Station. It does not stop half-way down Jerningham Road nor exclude Musgrove, Troutbeck and the northern end of Pepys Road as the figure purports to show. We appreciate that the outlines on the map are not meant to be more than indicative but there is a considerable danger that that they might be used to justify inappropriate development. Where any such figures are clearly incorrect, as they are in this case, they must be amended.
226. Furthermore **figure 13.1** fundamentally mis-represents the catchment area of New Cross Gate. As we note below, most of the residents of Telegraph Hill up to the Vesta Road/Kitto Road line look principally towards New Cross Gate and the A2 for their transport needs; whilst south of that line there is a greater use of Brockley or Nunhead. For shopping the whole of area generally looks towards New Cross Gate for supermarkets and to Nunhead for small specialist shops rather than to Brockley.
227. We have objected before, and continue to object to, the split of the Borough in the way it is set out in this Part of the Plan. The Area map (**figure 13.2**) splits the Telegraph Hill Conservation Area into two parts. The majority of Telegraph Hill is included in the West Area and is therefore separated from Hatcham Park and the part of the Telegraph Hill Conservation area between Pepys Road and Jerningham Road in the North Area.
228. We imagine this is to scope part of the Conservation Area into the North Area for the purposes of considering the effect on proposals relating to the New Cross Road on the area and, if this is the case, then this is a welcome improvement over the previous split which ran along the New Cross Road.
229. A much larger part of the Telegraph Hill Conservation Area is however affected by what happens on the A2 New Cross Road and in New Cross and New Cross Gate than implied on these maps. It looks to New Cross and New Cross Gate as its local shopping centre and not to Brockley. The New Cross Gate railway station is the major station for the majority of Telegraph Hill residents (a minority using Brockley or Nunhead) and developments which impact on the capacity of that station to service the area impact significantly on these local residents.
230. Hatcham Park and Telegraph Hill on either side of the A2 were developed together by the Haberdashers' Livery Company, with a homogeneity of design that resulted in them both becoming Conservation Areas in 1990. Even the map on page 470 shows Telegraph Hill as overlapping more with the lower part of New Cross than with Brockley. It makes no sense therefore to have the split where this Plan places it.
231. Two further and specific example of these issues:
- The Besson Street triangle is in the North Area, but the changes to the traffic flows around that area with the recent remodelling of traffic flows in Besson Street and New

Cross Gate have had a considerable impact on the residents of the west side of the Telegraph Hill Conservation Area

- The Goldsmiths A2/A21 gyratory system is in the North Area, but changes to the traffic flows in that area, including recent temporary changes whilst gas works were carried out, have increased the traffic across the east side of the Telegraph Hill Conservation Area.
232. We accept that Telegraph Hill does not have much in common with the “true” more - industrial northern parts of the Borough or with Deptford. However, in terms of site typography and the built environment, Hatcham Park also has more in common with Telegraph Hill than with North Deptford. We would propose therefore that the Hatcham Park area should be included in the West Area so that New Cross Gate, Hatcham Park and Telegraph Hill can be considered holistically.
233. There is little in these sections about the Conservation Areas, and it is noticeable that the West Area section of this Plan does not mention Telegraph Hill or the Telegraph Hill Conservation Area at all.

15 LEWISHAM’S “NORTH” AREA

234. **Key spatial objective 1** : We are significantly concerned over the intent behind the reference to *“a new modern station at New Cross”*. We assume, firstly, that this means New Cross Gate and not New Cross. On that assumption, as we have stated in all previous submissions, we believe that, whilst new station buildings would be required to the north of the existing building and underground, it is important for the heritage of the area that the existing station building on the New Cross Road – which is a distinctive feature of the area – should be retained. We note that **§ 15.59** states that the *“creation of a new Bakerloo Line station should integrate with the existing station”* which, contrary to **KSO 1**, implies the retention of the existing station buildings. The *“a new modern station at New Cross”* in **KSO 1** could best be omitted or, if not, reworded to say *“with station improvements at New Cross Gate”*.
235. **Key spatial objective 8** is not acceptable as worded. The A2 is a major arterial network taking traffic from the whole of Kent and much of Sussex into central London and back out again. Any attempt to make it *“into a ‘healthy street’ with public realm improvements that make walking, cycling and use of public transport safer and more convenient”* is likely to push traffic onto residential roads, particularly across Telegraph Hill (see also paragraph 211) but also through the streets to the north of New Cross in order to gain access to the A200 as an alternative route. Static and congested traffic creates pollution. Spreading traffic across residential roads adds to the pollution on those roads, creates additional hazards for pedestrians, and adds to noise disturbance to residents of those streets. In short, making the A2 a *“healthy”* street risks making large proportions of the rest of the area less healthy. The policy should be reworded to include a proviso that this will only be done provided that no traffic is displaced onto residential roads and, as suggested under paragraph 211 that this will be established in advance by robust and transparent modelling and monitored thereafter.
236. An alternative key spatial objective, which should be pursued, is to accept that the A2 is a major arterial road, to move cycling provision on to routes parallel to the A2 and to move, over time, the key shopping provision from the main road onto other sites (see our

comments on shopping in paragraphs 169-171 above and on cycling- and pedestrian-friendly routes in paragraphs 238 and 250 below.)

237. As regards the statement in **§ 15.5**, whilst we agree that the high street in Deptford may offer a “*rich and vibrant mix of shops*” it is hard to see that New Cross/New Cross Gate does so. The retail take is, in our view, poor being mainly confined to food provision, off licences and a couple of dry cleaners (again refer to our comments on the shopping offer (paragraph 169) above.)

LNA1: North Area place principles and LNA2: New Cross Road/A2 corridor

238. As stated in the preceding paragraphs, we have considerable concerns as to whether this policy is either achievable or, indeed, desirable. We agree that the A2 is a strategic movement corridor, but are deeply concerned that giving “*priority to safe and convenient movement by walking and cycling*” as set out in **LNA2.A.C** and **LNA2.D** will push traffic onto residential roads, in particular across Telegraph Hill but also through the streets to the north of New Cross to gain access to the A200 as an alternative route. The A2 is the primary traffic route and must remain so. Issues around cycling can be dealt with by parallel cycle routes avoiding the A2 and shopping can be encouraged off the main road by the re-imagining of the shopping centre utilising vacant land to the north of the A2. This policy as it presently stands, is not acceptable and will be strongly opposed by residents.
239. At a minimum **LNA2** should make it clear that the Council will only support proposals for change and will only itself make changes that do not result in an escalation of traffic onto primarily residential roads.
240. Policy **LNA2.B.a** should specifically include the need to respond sympathetically to the Hatcham Park, St James and Telegraph Hill Conservation Areas.
241. In respect of policy **LNA.D.a**, please see our response to **Key spatial objective 8** above - whilst we agree that the station will need upgrading to cater for the BLE, the original station buildings contribute to the heritage of the New Cross Road. A new station interchange (as stated here) is acceptable but a new station or an interchange which involves the destruction of the existing station building is not.

Consistency of policies across the whole of the Telegraph Hill Conservation Area and Telegraph Hill Neighbourhood

242. If the current the split of the Telegraph Hill Conservation Area between North and West Areas is to continue, then it is important that the policies here are consistent, as far as the Telegraph Hill Conservation Area is concerned, with those of the West Area. In particular, the following policies are equally applicable to the North Area part of Telegraph Hill as they are to the West Area part.
- LWA1.B “*Development proposals must respond positively to the character of established residential areas. This includes the historic character of the area’s neighbourhoods, and particularly their town centres which are defined by their Victorian shopping parades and make an important contribution to local distinctiveness.*”
- LWA1.J Small site guidance generally.

It would be wholly illogical to apply different policies to differing parts of the Telegraph Hill Conservation Area merely because they have been arbitrarily assigned to different Areas despite identical characterisations.

It should also be considered that similar policies should apply to the Hatcham Conservation Area whose characteristics are similar to those of Telegraph Hill and Brockley.

243. An SPD or design guide on the Haberdashers' Estate (incorporating both the Telegraph Hill and Hatcham Park Conservation Areas) should be produced in order to ensure that this consistency of approach is not lost by virtue of the arbitrary North/West split. We would be very happy to work with the Council on an SPD or design code covering Telegraph Hill and have details of window designs, paths, ironwork, original ornamentation, materials and similar considerations already available.
244. For our comment on § 15.59, see paragraph 234 above.

Former Hatcham Works, New Cross Road

Height and density

245. For the reasons set out in more detail in our commentary on policy QD4 (paragraphs 86 to 87) we do not believe the site is suitable for tall buildings and, as set out above, believe it would be more in line with the Borough's Vision for a welcoming borough and its policies on shopping and employment if the area was developed for retail (paragraphs 169 to 171) and for creative employment uses (paragraph 157).
246. In terms of the aspiration and desires of residents for a liveable, welcoming and attractive area (which Lewisham's Vision aspires to) we would again refer you to the survey we carried out when the Sainsbury's/Mount Anvil scheme was put forward, which showed, inter alia:
- (a) The development was over-dense and over-tall and the capacity for units should be reduced to no more than 7-10 storeys
 - (b) No development should be built before the Bakerloo line is in place
 - (c) There was insufficient provision for green space
 - (d) There was insufficient provision for affordable homes
 - (e) Any development should commit to funding all provision for sufficient new facilities, not just capital spend
 - (f) No development should be built unless it incorporates adequate car parking
 - (g) Concerns over traffic and "rat-running"
 - (h) Concerns over the heritage impact and
 - (i) Concerns over the impact on existing local communities.

The full survey results are given in Appendix 2 to this paper.

Issues (b) and (d) are addressed in the proposed Local Plan and there is scope, although involving ambiguity, for the proposed Plan to address some of the other points. It is, however, impossible for the Plan, given the current proposed number of development units, to meet the aspirations and wishes of residents as regards issues (a), (h) or (i). Even discounting a dense development and reverting back to the Council's previous (and more

acceptable) plan for 200-300 units, any development is wholly inappropriate given the capacity of the current railway lines through New Cross Gate which, pre COVID-19, led to regular situations where the platforms and carriages were dangerously overcrowded, and given the additional demand which will be placed on the railway system by the Besson Street development (recently approved) and any development on the Goodwood Road site. We reiterate, no substantive redevelopment of the site should be considered before the BLE is constructed.

Site Considerations

247. The site considerations in the table on **page 603** should include “Deficiency of Open Space” and “Sensitivity to tall towers”. We find the lack of the first of these particularly surprising given the deficiency of public space in the North Area (as outlined in Part Two **Section 10** of the Plan and graphically illustrated in **figures 10.2 through 10.6**). We presume this must be an error as it is clearly a key consideration in achieving a healthy borough as set out in the Vision (see our comments at paragraph 27).
248. The site considerations also need to take into account transport capacity issues, particularly with reference to **TR1** and, specifically, **TR1.I**.

Other considerations

249. The considerations in the remainder of this section follow from our comments above on Parts One to Three of the draft Plan and are consistent therewith. They should not be taken to mean that the proposed indicative development of capacity of 912, which would require tall buildings, can ever be made acceptable but should be taken as applicable to any scale development acceptable on the site.
250. The Development Requirements (**§ 15.59**) need specifically to reference a requirement for a cycle/pedestrian route as an extension across the railway line from Hatcham Park Road to Batavia Road. This route is critical in that it will allow access to Fordham Park open space from any new development and will provide a safe route for cyclists without restricting traffic flow on the A2 and thereby prevent the need for measures that would increase traffic on residential side roads (see paragraphs 238 and 239 above)
251. Any Development Requirements (**§ 15.59**) and Development Guidelines (**§ 15.60**) for the site should include a specific reference back to the need for new green infrastructure and social infrastructure. Major objections to the previously proposed Hatcham Works developments from local residents included the impact of additional units on already crowded local parks and medical facilities (see Appendix 2). There should therefore be the requirement that any new development must not reduce the amount of available green recreational space on a per capita basis for the surrounding area and, given the identified lack of such existing space in the area, must increase it if possible.
252. Any Development Requirements (**§ 15.59**) and Development Guidelines (**§ 15.60**) should further require that any redevelopment of the site should include a supermarket provision.
253. The Development Guidelines (**§ 15.60**) should be reworded to require that the development includes no buildings that would dominate the Hatcham Park Conservation Area and should generally be limited to no more than six to eight stories (please refer to both Appendix 1 and Appendix 2). Designs should reflect the local character rather than merely and ambiguously “*respond positively to the local character*”.

254. The Development Guidelines (**§ 15.60**) need to ensure that adequate consideration is given to traffic flows such that they do not impact adversely on the Telegraph Hill and Hatcham Conservation Areas. We were deeply concerned about the Council proposals and the Sainsbury's/Mount Anvil withdrawn proposals for the "Hatcham Works" site which, we believe, would have directed considerably more traffic through Telegraph Hill on a North-South route. We note **§ 15.59** which states that the integration of the site "*will require a hierarchy of routes with clearly articulated east-west and north-south corridors*". We would like the policy to make clear that this refers only to walking and cycling connections and not road connections. There is no north-south road corridor at present and, indeed, in the 1990s the junction between Jerningham Road and the New Cross Road at New Cross Gate Station was specifically re-designed after lobbying by the Telegraph Hill Society, with huge community support, to minimise the impact of north-south traffic generated by the development of the Sainsbury's supermarket and other retail outlets (there had been no significant traffic prior to that point). Given the residential nature of Telegraph Hill and the location of the Haberdashers' Askes' two schools at the north and south ends of Jerningham Road, we will strongly resist any proposal that would facilitate an increase in traffic along this road and through Telegraph Hill.

Former Goodwood Road and New Cross Road site

255. Our objections to densification apply less to this site as the proposed number of units is considerably smaller, although the capacity of the site will depend in part on the development capacity adopted for the Hatcham Works site. A tower on this site would not impact visually on the Telegraph Hill Conservation Area and would impact less on the Hatcham Conservation Area than any tower on the Hatcham Works site.
256. We consider, however, that this site is especially appropriate for additional retail shopping, moving that shopping from the A2 into a more pedestrian friendly area and the considerations outlined in paragraphs 247 to 253 would also apply to this site. In particular, care needs to be taken that the height of any buildings does not significantly impact on the appearance of the New Cross Road and, in particular, the adjacent Victorian shopping arcade as shown in the illustration accompanying paragraph 130.

18 LEWISHAM'S "WEST" AREA

257. We have little comment on this section which appears to ignore Telegraph Hill. See our comments on the North Area for our overall view that the Telegraph Hill and Hatcham Park Conservation Areas should be brought into the West Area in order to allow for a holistic treatment of the former Haberdashers' estate development and for our comments on how, if this is not done, the two sections of the Plan should be consistently presented to protect the joint area. The key requirement would be an SPD covering the whole estate.
258. As noted above, we would be very happy to work with the Council on an SPD or Design Code covering Telegraph Hill and have details of window designs, paths, ironwork, original ornamentation, materials and similar considerations already available for incorporation in such a document.

PART FOUR

19 DELIVERY AND MONITORING

Delivery

259. As part of the delivery process and ensuring compliance with the principles in the Plan it is fundamental, as we have outlined above, for the Borough to commit to updating as soon as possible its guidance and detailed policies including Conservation Area Character Appraisals and to introduce design codes based on a more detailed understanding of each area. See our further references to this in paragraphs 60 131, 135, 142 and 258.

Consultation

260. There is very little in the Plan or the Vision which shows an on-going involvement with residents in what happens in the Borough once the final Plan is adopted. It is fundamental to good planning that local communities are involved, especially as such communities will evolve and change over the 40 year life of the Plan.
261. Nor should relevant parts of any community be left out of consideration purely because of artificial boundaries drawn either for the purpose of this Plan or for electoral ward purposes. As Part Three of the Plan acknowledges, boundaries are blurred and developments in one area can affect easily affect others
262. Ward boundaries, in particular, do not relate to either character areas or neighbourhoods mapped out in **figure 13.1**. For example $\frac{1}{4}$ of Telegraph Hill is in the North Area and $\frac{3}{4}$ is in the West Area and yet it is all in Telegraph Hill Ward, which also includes Honor Oak and the Kender Triangle. The Plan acknowledges that New Cross/New Cross Gate is the principal shopping centre for much of Telegraph Hill and the great majority of the Telegraph Hill Conservation Area and the community of people who live there will be affected by developments on the Hatcham Works site, but none of those people are in the New Cross Ward where Hatcham Works and the district shopping centre is located.
263. We have argued in other submissions that the Ward boundaries are inappropriate for planning purposes and the split between the North and West Areas of the Plan make them even more so. It follows, therefore, that Local Ward Assemblies, for example, are an inappropriate vehicle for community engagement and new groupings, more in alignment to this Local Plan, need to be developed. The opportunity also seems to have been missed to align the Area boundaries with the four Neighbourhood Community Development Partnership areas used for health and social services planning.

Enforcement and achievement

264. A policy on enforcement appears to be missing. This omission needs to be rectified. Having development policies are effectively a waste of time if they are not enforced. This is particularly important as regards protecting our local heritage as set out in **Strategic Objective F** and policy section **HE**.
265. The Plan also needs to detail how the Council will enforce and monitor its own compliance with the Plan. In order to retain the trust of both residents and developers it is extremely important that the Council transparently upholds the principles it is espousing.

266. At the macro level this involves setting and monitoring progress towards achieving a detailed series of targets, and the need for the introduction of these is set out in our opening paragraphs on the Vision (paragraphs 3 to 8). To have such a “Vision” is admirable and, as we have said, Lewisham’s Vision is laudably aspirational but, unless the progress towards it is measured and failures to achieve it rectified, it is worth less than nothing. A Vision that is not adhered to will simply lower the opinion of the Council in the minds of residents, stakeholders and potential partners and will lose general respect.
267. At a more granular level we have numerous examples of where planning policies have been ignored by developers and planning applications not made where they were clearly required with no enforcement action apparently taken. We also have examples where planning decisions have been made which were clearly against explicit bars in the UDP (i.e. where the UDP says “The Council will not allow ...” and yet the Council did so allow).
268. Whilst we appreciate that the Council may not have the resources to follow up every infringement at present, that should not be expected to be the case throughout the life of the Plan, nor should any part of the “Vision” imply that such infringements might be allowed. To ensure the “Vision” succeeds, it needs to be enforced.

DM1 working with stakeholders to deliver the Local Plan

269. We welcome the commitment by the Council in **DM1.A** to take a “*proactive and positive approach*” to working alongside community groups. In order to add some flesh to this otherwise bland statement, the Council should acknowledge that community groups do not have the resources, being volunteers, in the same way as either the Council or developers do. The planning process is therefore inherently biased and unfair and the Council should do all it can to ensure that any unfairness against local residents and community groups is removed as far as possible. There should therefore be firm commitments stated within the Plan that, when funds are available, the Council will:
- re-introduce the Amenity Societies Panel (even just providing the relevant files for discussion and a space to meet would be beneficial all round)
 - provide resources to help communities understand planning issues and get involved in the planning processes at Local Plan, area plans, neighbourhood plan and site-specific planning levels and also in designing Character Appraisals and Design Codes to further inform future local development and
 - provide similar levels of assistance to community groups and concerned residents as are provided for developers in terms of seeking advice.
270. We note that the wording of **DM1.A** which specifies “*local communities and community groups*” separately from “*key stakeholders*” suggests that local communities and community groups are not key stakeholders when, in fact, they are the primary interested parties in anything which affects their communities. We imagine this to be a drafting error and that the implication is not intended. We would suggest that this be re-written to read: “*to working alongside key stakeholders, including local communities and community groups, ~~key stakeholders~~, landowners and development industry partners, and the wider public*”

DM2 Infrastructure funding and planning obligations

271. With reference to policies **DM2.B** and **DM2.C** we note that CIL money will be allocated “to help ensure local areas are appropriately supported with infrastructure and benefit from

investment generated by new development”. This should also state that it will be allocated to ensure that local areas are compensated for any disadvantages that might accrue from new development. The Ward Assemblies, as we have pointed out above (paragraphs 260 to 263) do not correspond with the areas affected by developments and therefore are not the appropriate forums in which to discuss allocation of CIL monies. **DM2.B** and **DM2.C** need to be re-written to ensure that all residents affected by developments have an equal say in the use of neighbourhood CIL.

PART FIVE

20 GLOSSARY

272. We refer to the following terms in the above paper which we believe require further consideration to avoid confusion:

- Heritage Asset (paragraph 140)
- Markets (paragraph 176)
- Opportunity Area (to eliminate the discrepancy identified in paragraphs 34, 35 and 40)

273. There are also terms which are used within the Plan which are not defined in the glossary. In some instances they are terms that stem from government or GLA guidance and therefore definitions should be referred back to that, in others no definition is given and therefore the interpretation of those terms is left wholly open to doubt. Some terms which we believe should be considered for definition are:

- design-led (see paragraph 42)
- garden (rather than “back garden” see the discussion in paragraphs 125 to 128)
- good design
- healthy streets (as in “Healthy Streets Approach” and “Healthy Streets principles”)
- heritage environment (see paragraph 137)
- home (family housing is defined, but “home” is not)
- main town centre use
- re-enforce and re-invent (as used in figure 3.2)
- special characteristics (which we take to mean those characteristics which make an area distinctive and contribute to its specific character and which include but are not confined to those identified in the Characterisation Studies, Conservation Area Character Appraisals, area or site-specific SDGs and any Design Codes).

This response has been prepared by the Committee of the Telegraph Hill Society. Enquiries in the first instance should be addressed to the chair, c/o 92 Jerningham Road, London SE14 5NW or by email to ths@baccma.co.uk

APPENDIX 1

CREATE STREETS DESIGN GUIDE FOR HEALTHY COMMUNITIES

The below table is taken from “Create Street’s – A Direct Planning Revolution for London.”^{viii}

What should streets & buildings look and be like

Connectivity	1. Streets that ‘plug into’ city 2. Highly walkable
Space	3. Minimal internal semi-private space (unless high end residential) 4. Control over who meet, how & when (no corridors) 5. Open space below normally <90m in breadth
Greenery	6. Lots of green space but mainly (not entirely) modest in scale (squares, pocket parks) 7. A high proportion via private or communal spaces 8. Street trees wherever possible
Height	9. Human scale height (2-7 storeys) 10. Limited high rise & only with commercial or high end residential. No children in high rise
Size	11. Blocks not too big or too long 12. Buildings as buildings not blocks
Homes	14. As many houses as possible 15. Homes in conventional streets 16. Maximum private gardens 17. Minimal children in flats
Design	18. Strong sense of place “Couldn’t be anywhere” – including style & use of materials that normally at least reference memory & locational heritage (though not exclusively) 19. Variety of streets types, design, green spaces 20. Streets that bend & flex with contours of landscape – some surprises !
Density	21. Dense enough to be walkable while providing space 22. From suburban to ~ 230 units / hectare – much harder beyond that

APPENDIX 2

HATCHAM WORKS SITE: RESIDENTS' SURVEY

This appendix shows the results of the survey carried out by the Telegraph Hill and Hatcham Societies in response to the 2019 proposals by Sainsbury's and Mount Anvil for the development of the Hatcham Works site. Whilst that proposal was withdrawn, the survey results are indicative of what local residents regard as acceptable and unacceptable development of that site.

This section repeats verbatim the summary we intended to include in our objections to the above development, with the exception of the Appendix to that report which included the detailed written (anonymised) comments that respondents made. If the Council wishes to see those comments the Telegraph Hill Society would be happy to provide them on application.

RESIDENTS' VIEWS: OUR SURVEY

When the applicant published their pre-planning proposals, we established our own on-line survey which was publicised via the NewXGateActionGroup website, Facebook, Twitter and various posters.

The survey was open between mid November 2019 and mid January 2020. 635 responses were received (not all respondents answered all questions).

The results are shown below.

In summary, the overwhelming majority of residents who responded:

- Strongly objected to the proposals
- Did not feel that a development should be built before the Bakerloo is built
- Did not feel that the amount of green space provision was adequate for the number of units proposed
- Believed that developments on the site should not be taller than 7 to 10 storeys high
- Did not feel that the provisions for affordable homes was sufficient
- Felt that there needed to be a commitment to funding all new facilities required for the number of residents proposed
- Should not be built unless adequate car parking is available
- Are extremely concerned about traffic impact including buses and "rat-running"
- Are extremely concerned about the impact on the heritage and appearance of the Conservations Areas and New Cross Gate
- Were extremely concerned about the community impact generally that the development would have.

Residents were not required to give a postcode or address although 406 of the 635 respondents did so. The distribution of responses shows that most respondents lived locally (which might or might be the case with the corresponding Sainsbury's surveys as their customers could potentially come from a wider catchment area) and that, as expected, the more opposed answers generally came from those who lived closer to the proposed development and would be most impacted by it. The distribution map follows the results tables below.

It is possible to aggregate the total scores in our questionnaire to provide an overall opinion of respondents to all questions ranging effectively from 1 (strongly object) to 10 (strongly support) and on this basis the proposals score 1.32.



Q1 Overall proposal of site					
<p>What are your views on Sainsbury's transforming the supermarket site through the building of 1,500 (later amended to 1,161) new homes with tower blocks of up to 33 storeys high and no car-parking provision?</p>	1 Strongly object to the proposal	77%	488		
	2 Very much against	5%	33		
	3 Fairly against	4%	28		
	4 Slightly against	3%	17		
	5 Indifferent/marginally against	2%	11		
	6 Indifferent/marginally for	1%	6		
	7 slightly in favour	1%	8		
	8 Fairly in favour	1%	7		
	9 Very much in favour	1%	6		
	10 Strongly support the proposal	5%	29		
			633		
Q2 Density and capacity pre-Bakerloo line					
<p>If new housing of this density is to be built, should it be permitted before the Bakerloo line extension is in place, bearing in mind the capacity problems at New Cross Gate Station and the possibility that such a development might prevent the extension being constructed?</p>	1 The development should not be allowed	83%	509		
	2 Very much against allowing it	4%	25		
	3 Fairly against	3%	18		
	4 Slightly against	1%	4		
	5 Indifferent/marginally against	2%	13		
	6 Indifferent/marginally for	1%	6		
	7 slightly in favour	0%	3		
	8 Fairly in favour	1%	7		
	9 Very much in favour of allowing it	0%	2		
	10 The development should go ahead	4%	27		
			614		
Q3 Green space					
<p>Is the amount of public green space (about 2 acres) being provided adequate given the number of new residents? (2 acres is approximately 1/5 of the size of the combined Telegraph Hill Parks and about the size of Eckington Gardens)?</p>	1 Wholly inadequate	71%	432		
	2 Pretty much inadequate	7%	41		
	3 Fairly inadequate	8%	48		
	4 Slightly inadequate	5%	33		
	5 OK/Marginally inadequate	3%	20		
	6 OK/Marginally adequate	1%	4		
	7 Just about adequate	0%	3		
	8 Adequate	1%	6		
	9 Better than adequate	0%	2		
	10 Fully adequate	3%	17		
			606		
Q4 Tower height (storeys)					
<p>The current proposal includes a 33 storey tower (about the height of Centrepoint). What is the maximum height of any tower blocks that you would feel appropriate on the site given the proximity to the Hatcham Park and Telegraph Hill Conservation Area and residential streets?</p>	1 <=3	21%	124		
	2 4 to 6	36%	215		
	3 7 to 10	27%	162		
	4 10 to 12	6%	34		
	5 12 to 20	4%	27		
	6 20+	7%	40		
			602		
Q5 Affordable homes					
<p>What are your views on the proposals for a provision of 35% affordable homes by number of rooms (not units) on the site?</p>	1 Excessive	5%	30		
	2 Somewhat excessive	1%	5		
	3 Slightly more than needed	1%	7		
	4 Marginally more than needed	2%	12		
	5 About right	14%	84		
	6 marginally inadequate	3%	17		
	7 Slightly inadequate	9%	54		
	8 Fairly inadequate	12%	69		
	9 Very inadequate	6%	34		
	10 Wholly inadequate	47%	279		
			591		
Q6 Funding infrastructure					
<p>Should Sainsbury's be required to commit to funding any required new facilities such as GP surgeries, libraries, schools, leisure facilities and open space before any development is permitted?</p>	1 Yes - needs to be provided for all	73%	432		
	2 Yes- almost all	5%	30		
	3 Yes- mostly	5%	27		
	4 Yes - partly	2%	9		
	5 Some but not all	10%	58		
	6 Some but not all	1%	5		
	7 A moderate amount	1%	4		
	8 A small amount	1%	8		
	9 Hardly any	0%	2		
	10 No - nothing needs providing	2%	13		
			588		



Q7 Bakerloo line

There have been suggestions that the development of the site would frustrate the construction of the Bakerloo line extension either because of the additional cost or complexity caused. Funding for the extension is not yet available. What are your views?

1 Not allowed until line is built	61%	356	
2 TFL confirmation required	34%	197	
3 No issue	5%	27	
		<u>580</u>	

Q8 No car parking

The development includes no car parking. Sainsbury's have suggested that the impact of the development on parking could be resolved by the introduction of a controlled parking zone (CPZ) in the area if necessary. What are your views on this?

1 happy	8%	43	
2 Cost free	15%	86	
3 Live with it	5%	30	
4 Don't build	72%	404	
		<u>563</u>	

Q9 Traffic generally

Even though car ownership will be strongly discouraged according to Sainsbury's there will be an impact on traffic management in the area which will also involve changes to bus routes. To what extent would you be concerned about potential increase in traffic, including buses and "rat-running", through existing residential roads?

1 Extremely concerned	72%	409	
2 Very much concerned	7%	39	
3 Fairly concerned	8%	48	
4 Slightly concerned	4%	20	
5 Indifferent/marginally concerned	4%	20	
6 Indifferent/marginally unconcerned	1%	5	
7 Slightly more unconcerned than not	0%	2	
8 Not very concerned at all	2%	9	
9 Hardly concerned	0%	1	
10 Not concerned	3%	17	
		<u>570</u>	

Q10 Heritage generally

Overall, what is your view of the impact that the development would have on the heritage and appearance of New Cross Gate, Hatcham Park and Telegraph Hill?

1 Extremely concerned	66%	376	
2 Very much concerned	9%	52	
3 Fairly concerned	8%	45	
4 Slightly concerned	5%	29	
5 Indifferent/marginally concerned	6%	32	
6 Indifferent/marginally unconcerned	2%	9	
7 Slightly more unconcerned than not	1%	4	
8 Not very concerned at all	1%	6	
9 Hardly concerned	-	-	
10 Not concerned	3%	15	
		<u>568</u>	

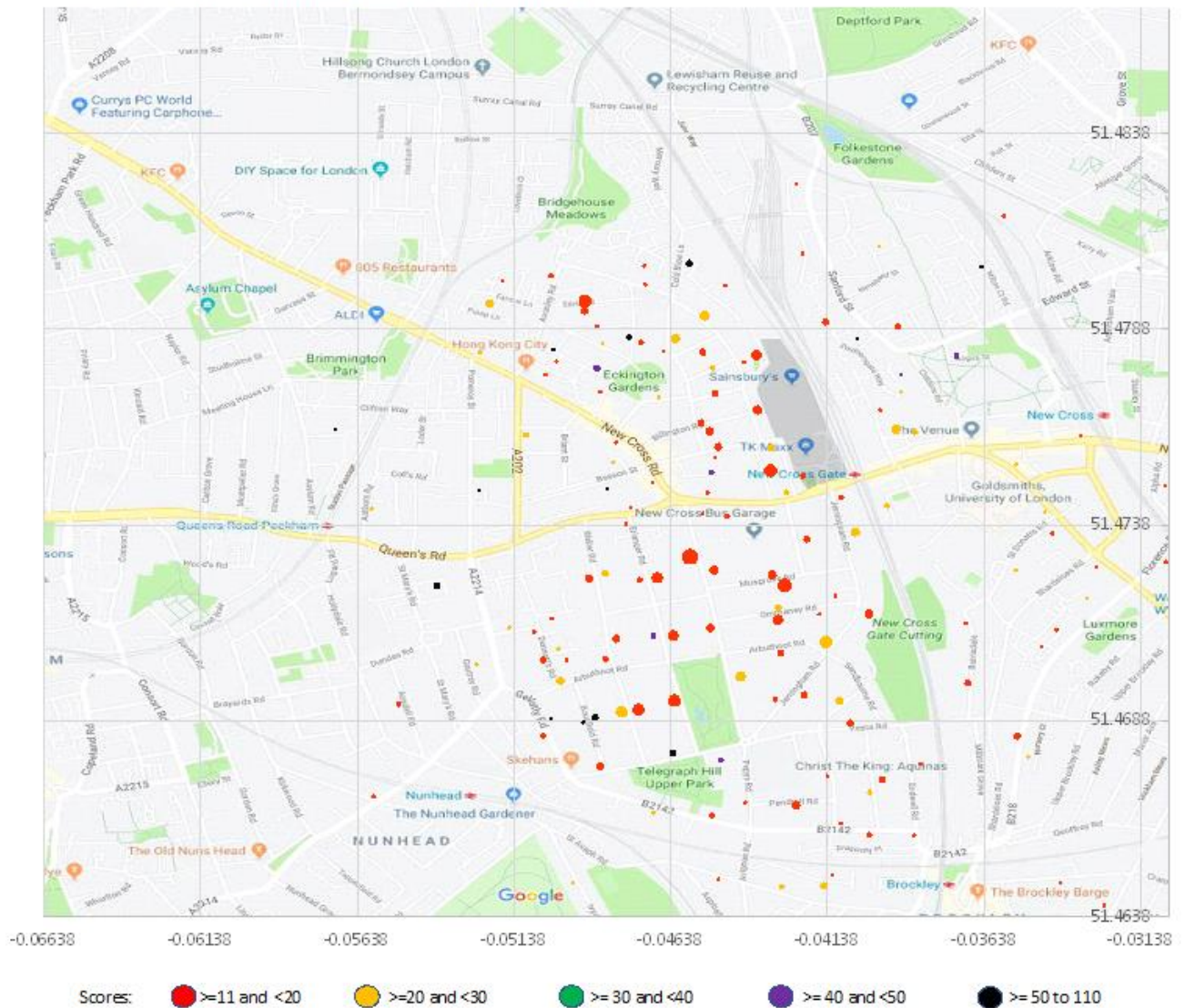
Q11 Community impact generally

And, finally, overall, what is your view of the impact that development would have on the communities that exist in New Cross Gate, Hatcham Park and Telegraph Hill?

1 Extremely concerned	57%	321	
2 Very much concerned	10%	54	
3 Fairly concerned	13%	74	
4 Slightly concerned	6%	33	
5 Indifferent/marginally concerned	6%	36	
6 Indifferent/marginally unconcerned	2%	11	
7 Slightly more unconcerned than not	1%	8	
8 Not very concerned at all	2%	9	
9 Hardly concerned	-	-	
10 Not concerned	3%	17	
		<u>563</u>	

Location of respondents:

Circles are at the centre of the postcodes for each respondent and do not show the actual location.
 Size of circles represents the number of respondents in that postcode.



The scores used in this map are an aggregate taking into account the order the priorities within the question and rating each question on a 1 to 10 basis, therefore the lowest that can be scored across the 11 questions (meaning the worst rating for the proposed development) is 11 and the highest that could be achieved by the proposed development if supported would be 110.

INDEX

Paragraph References to the draft plan

References to paragraphs in the draft plan are given as numbers; Figures Tables, Strategic Objectives, Key spatial objectives and pages (where paragraphs in the report are unnumbered) are indicated accordingly; all other references are to specific policies. The references indexed are to paragraphs in this report.

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