Regulation 19 Local Plan Consultation:

Citizen Space and Commonplace responses

Contents

Joseph Lyne	2
lan Gidley	3
Mark Christopher Wood	5
Michael Atkins	8
Michael Atkins	13
Lena	18
Jonathan Sharif	20
Tom Clarke MRTPI	21
Bridget Fox	24
Camilla Barlow	26
Will Martin	27
Commonplace responses	28

Commonplace responses: (Names have been redacted from Commonplace responses for the time being due to Commonplace's GDPR regulations. Names of respondents will be made available for the examination submission)

Joseph Lyne

What is your organisation? - Organisation n/a

To which part of the Vision, Strategic Objectives and the Spatial Strategy chapter does you representation relate? (Representations must be made on a specific policy within the Vision, Strategic Objectives and the Spatial Strategy chapter. Please state the policy number and name in the box below) - Policy name/number TR3

Do you consider that this part of the Vision, Strategic Objectives and the Spatial Strategy chapter is legally compliant: - Legally Compliant
Yes

Do you consider that this part of the Vision, Strategic Objectives and the Spatial Strategy chapter is sound - Soundness

Yes

Do you consider that this part of the Vision, Strategic Objectives and the Spatial Strategy chapter is compliant with the Duty to Co-operate - Duty to Co-operate

Yes

To which part of the Lewisham West Area chapter does you representation relate? (Representations must be made on a specific policy within the Lewisham West Area chapter. Please state the policy number and name in the box below) - Policy name/number LWA1

Do you consider that this part of the Lewisham West Area chapter is sound - Soundness Yes

Do you consider that this part of the High Quality Design chapter is compliant with the Duty to Cooperate - Duty to Co-operate Yes

Ian Gidley

What is your organisation? - Organisation

Land & Planning Consultants Ltd

To which part of the Appendices and Schedules chapter does you representation relate? (Representations must be made on a specific policy within the Delivery and Monitoring chapter. Please state the policy number and name in the box below) - Policy name/number Schedule 7: Designated Open Space

Do you consider that this part of the Appendices and Schedules chapter is legally compliant - Yes /No

No

Do you consider that this part of the Appendices and Schedules chapter is sound - Yes / No $\,$ No $\,$

Please give details of why you consider this part of the Appendices and Schedules chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments

It is considered that designation of private land at Duncombe Hill/Brockley Rise as designated open space is unsound and might also be unlawful.

There is an absence of any evidence or justification for its designation and the recent Open Space Review does not address this as lacks a qualitative assessment. Seems to be a political decision and not based on any sound town planning judgement. The land is privately owned and fenced. Accordingly, it cannot be used by the public and is not used for recreation or other use of value and this will be the case in perpetuity unless developed. It is not laid out or managed as formal open space or amenity space and does not possess the essential attributes or minimum quality to justify designation within an adopted Local Plan. Designation ignores a recent appeal decision which has a legal status and confirmed that the land is not open space. The Inspector opined:

"I conclude that the appeal site is not an open space of public value. Consequently, I find that the appeal site is not an existing open space as defined by the Framework."

We have repeatedly subsequently requested that it be removed as designated open space and removed from open space studies but again this has been ignored and it was illegally included in the neighbourhood plan which is subject to an official complaint and referral to the Local Government Ombudsman.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

Remove land bounded by Duncombe Hill/Brockley Rise as a designated open space and removal from policies map as a strategic open space.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Yes / No Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: - Please explain below

To present evidence.

To which part of the Proposed Policies Map does you representation relate? (Representations must be made on a specific policy within the Delivery and Monitoring chapter. Please state the policy number and name in the box below) - Policy name/number REGULATION 19 POLICIES MAP BOROUGH WIDE

Please give details of why you consider this part of the Proposed Policies Map is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments

It is considered that the Proposed Policies Map is barely legible, missing street names and not based on a proper OS base. This needs to be addressed.

Land at Duncombe Hill/Brockley Rise must be removed for the same reasons as per our objection to Schedule 7: Designated Open Space. It is neither a strategic open space or formal amenity green space or open space of any description.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

Removal of land at Duncombe Hill/Brockley Rise as strategic (or any kind) open space.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Yes / No Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: - Please explain below

To present evidence.

Mark Christopher Wood

What is your organisation? - Organisation MWA

To which part of the Economy and Culture chapter does you representation relate? (Representations must be made on a specific policy within the Housing chapter. Please state the policy number and name in the box below) - Policy name/number

Town Centre Network and Hierarchy / EC12

Do you consider that this part of the Economy and Culture chapter is legally compliant: - legally compliant

No

Do you consider that this part of the Economy and Culture chapter is sound - sound No

Do you consider that this part of the Economy and Culture chapter is compliant with the Duty to Co-operate - Duty to Co-operate

Yes

Please give details of why you consider this part of the Economy and Culture chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments

Criterion Ea. makes reference for main town centre uses in edge and out of centre locations to demonstrate via a RIA that there is an identified need and market demand for the amount and type of floorspace proposed. This requirement is not consistent with the NPPF (2021) which does not require an applicant to demonstrate a need (whether quantitative or qualitative) nor demonstrate market demand.

Thus this is not sound or legally compliant in so far as it is inconsistent with national policy.

Criterion F refers to 'major' Use Class E(a) retail. However the definition of 'major' is not defined.

The prioritising of sites within Lewisham and Catford within the site selection process is relevant only in so far as it involves a development whose catchment encompasses these centres.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible Delete criterion Ea.

A definition of what constitutes 'major' retail development should be included within the policy.

Criterion F should be amended as follows:

Proposals for new major Use Class E(a) retail development should prioritise Lewisham and Catford Major Centres in the site selection process where these fall within the primary catchment area of the development before considering other appropriate locations, including District Centres

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Participate in examination hearing No (I do not wish to participate in an examination hearing session)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: - Please explain below

This matter can be dealt with without attending a hearing session.

To which part of the Lewisham South Area chapter does you representation relate? (Representations must be made on a specific policy within the Lewisham South Area chapter. Please state the policy number and name in the box below) - Policy name/number Bell Green and Lower Sydenham/ LSA3

Do you consider that this part of the Lewisham South Area chapter is legally compliant: - Legally Compliant

No

Do you consider that this part of the High Quality Design chapter is sound - Soundness Yes

Do you consider that this part of the Lewisham South Area chapter is compliant with the Duty to Co-operate - Duty to Co-operate
Yes

Please give details of why you consider this part of the Lewisham South Area chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments

Policy LSA3 is predicated on the key spatial objectives for this part of the Borough. It supports the regeneration of the Bell Green Retail Park to create a residential led mixed-use area with a distinctive urban character. This also includes the Sainsbury's food store.

However the policy is not considered to be sound because it is not considered to be a realistic prospect of this site being developed in the manner proposed and therefore the policy is not considered to be effective.

No consultation has been undertaken with the owner of the retail park in advance of preparing the Reg 19 submission.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

Criterion c. should exclude from the policy the Bell Green Retail Park.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Participate in examination hearing Yes (I do wish to participate in an examination hearing session)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: - Please explain below

The policy raises significant implications in terms of the future of the Bell Green Retail Park which is owned by the West Midlands Pension Fund. Not only does it give rise to uncertainty as to the future of the retail park which contains a large number of occupiers under a range of leases, but it could also inhibit further investment in the short to medium term. The position of the Fund in respect of this policy therefore needs to be explained in detail to the examining Inspector(s).

To which part of the Proposed Policies Map does you representation relate? (Representations must be made on a specific policy within the Delivery and Monitoring chapter. Please state the policy number and name in the box below) - Policy name/number

Bell Green and Lower Sydenham/ LSA3

Please give details of why you consider this part of the Proposed Policies Map is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments

For the reasons provided under Policy LSA3 it is not considered that the redevelopment of the Bell Green Retail Park in accordance with the draft policy is likely to occur within the plan period.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

The Proposals Map should exclude the Bell Green Retail Park.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Yes / No
No

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: - Please explain below

This matter can be delete with by a written statement.

Michael Atkins

What is your organisation? - Organisation Port of London Authority

To which part of the High Quality Design chapter does you representation relate? (Representations must be made on a specific policy within the High Quality Design chapter. Please state the policy number and name in the box below) - Policy number and name QD7: Amenity and Agent of Change.

Do you consider that this part of the High Quality Design chapter is legally compliant: - Do you consider that this part of the High Quality Design chapter is legally compliant Yes

Do you consider that this part of the High Quality Design chapter is sound - Do you consider that this part of the High Quality Design chapter is sound No

Do you consider that this part of the High Quality Design chapter is compliant with the Duty to Cooperate - Do you consider that this part of the High Quality Design chapter is compliant with the duty to co-operate

Yes

Please give details of why you consider this part of the High Quality Design chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate.

In principle support policy QD7, which states that development proposals must clearly demonstrate how noise and other nuisances will be mitigated and managed and must comply with the Agent of Change principle in accordance with the London Plan.

However, it is considered that the supporting text at paragraph 5.58 must be expanded to include a specific reference that the Agent of Change principle should be applied to all noise-generating uses including industrial areas and safeguarded wharves, and that noise sensitive uses located in close proximity to such sites (including vacant wharves) must be designed to minimise the potential for conflicts of use and disturbance. This would ensure the policy in in line with regional and national policy including policies D12 (Agent of Change) and SI15 (Water Transport) of the London Plan, and paragraph 187 of the National Planning Policy Framework (NPPF).

With regard to artificial lighting, welcome that this policy now makes clear that development proposals adjacent to the River Thames must ensure that artificial lighting will not have an adverse impact on river navigation, and also consider water habitats with regard to light spill

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

Proposed amendment to paragraph 5.58 is as follows:

"Noise generating cultural and community venues (such as theatres, concert halls, pubs and live music venues), as well as other noise generating uses in Industrial Areas and Safeguarded Wharves should be protected for the benefit of the wider community and the local economy"

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Participate in examination hearing No (I do not wish to participate in an examination hearing session)

To which part of the Sustainable Design & Infrastructure chapter does you representation relate? (Representations must be made on a specific policy within the Sustainable Design & Infrastructure chapter. Please state the policy number and name in the box below) - Policy name/number Policy SD9: Lewisham's Waterways

Do you consider that this part of the Sustainable Design & Infrastructure chapter is legally compliant: - legally compliant
Yes

Do you consider that this part of the Sustainable Design & Infrastructure chapter is sound - sound No

Do you consider that this part of the Sustainable Design & Infrastructure chapter is compliant with the Duty to Co-operate - Duty to Co-operate
Yes

Please give details of why you consider this part of the Sustainable Design & Infrastructure chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments

Support the amendments made to part E of the policy which states that the Council will continue to safeguard Convoys Wharf taking into account the Ministerial Safeguarding Direction for the wharf and extant planning consents, however in order to consistent with regional policy it is recommended that supporting paragraph is updated to directly refer to Convoys Wharf.

Furthermore, the supporting text must include specific reference to the need for adjacent and nearby development proposals to be designed to minimise the potential for conflicts of use and disturbance, in line with the Agent of Change principle and London policy SI15, to ensure that the long term use and viability of the safeguarded wharf, which could operate over 24 hours a day in line with the tides is not constrained which could result in the wharf becoming unviable for waterborne freight cargo handling.

In addition, the key for figure 11.4 (Safeguarded Wharf at Convoys Wharf) must be amended as to reflect the confirmation of the safeguarded wharf boundary as part of the 2021 Ministerial Direction.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

Recommended that supporting paragraph 11.59 is amended as follows:

"There is a network of wharves, including Convoys Wharf, along the River Thames that are protected for use as a wharf for waterborne freight cargo handling by a safeguarding Direction issued by the Secretary of State on 1st March 2021".

Proposed wording with regard to Agent of Change principle for the supporting text to SD9:

"Development proposals located in close proximity to the safeguarded Convoys Wharf must be designed to take into account potential future wharf operations, which can take place over 24 hours a day in line with tidal movements, in accordance with the Agent of Change Principle and London Plan policy SI15"

The key to figure 11.4 (Safeguarded Wharf at Convoys Wharf) must be amended as follows:

"Confirmed Safeguarded Wharf Boundary"

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Participate in examination hearing No (I do not wish to participate in an examination hearing session)

To which part of the Lewisham North Area chapter does you representation relate? (Representations must be made on a specific policy within the Lewisham's North Area chapter. Please state the policy number and name in the box below) - Policy name/number Key Spatial Principles / Site Allocation 1: Convoys Wharf Mixed-Use Employment Location / Site Allocation 2 Deptford Landings Mixed-Use Employment Location (formerly known as Oxestalls Road) and Scott House.

Do you consider that this part of the Lewisham North Area chapter is legally compliant: - legally compliant

Yes

Do you consider that this part of the Lewisham North Area chapter is sound - Soundness No

Do you consider that this part of the Lewisham North Area chapter is compliant with the Duty to Co-operate - Duty to Co-operate
Yes

Please give details of why you consider this part of the Lewisham North Area chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments

- Figure 15.2 (North Area key diagram)

To ensure consistency with regional policy, figure 15.2 (North Area key diagram) must be updated to highlight the safeguarded wharf boundary for Convoys Wharf, and the proposed riverbus stop at Convoys wharf.

- Key spatial objective 10:

With regard to spatial objective 10 and the Thames Path. Whilst the PLA in principle supports the aim to enhance public access to the river, including by repairing breaks in the Thames Path. It must be recognised how in some cases there can be challenges in finding the best route near operational wharves and industrial areas, and that this will require a pragmatic solution to achieving appropriate, safe access around these sites. An amendment is therefore proposed to key spatial objective 10

- Site Allocation 1: Convoys Wharf Mixed-Use Employment Location.

PLA consider that the development guidelines section must be amended to state that as part of the proposed development and forthcoming Reserved Matters applications, the proposed residential development located in close proximity to the Safeguarded Wharf must be designed to minimise the potential for conflicts of use and disturbance, including by utilising the site layout, building orientation, uses and appropriate materials to design out potential conflicts, as well as implement any required mitigation measures in line with the Agent of Change principle to ensure future residents are protected, and that future wharf operators can operate without risk of nuisance complaint. This would be consistant with regional policy in the London Plan (SI15) and would also be in line with other Local Plan site allocations include sites 18 and 19 which do recognise this issue.

- Site 2: Deptford Landings Mixed-Use Employment Location (formerly known as Oxestalls Road) and Scott House.

As with allocation 1 in order to ensure consistancy with the London Plan the development guidelines section must be also be amended here to state that as part of the proposed residential development located in close proximity to the Safeguarded Wharf, this must be designed to minimise the potential for conflicts of use and disturbance, including by utilising the site layout, building orientation, uses and appropriate materials to design out potential conflicts, and implement any required mitigation measures in line with the Agent of Change principle.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

- Figure 15.2 (North Area key diagram):

Must be updated to include the safeguarded wharf boundary and the proposed riverbus stop at Convoys wharf.

- Key spatial objective 10 proposed amendment:

"Maximise the recreational and amenity value of the River Thames and Deptford Creekside by

transforming the riverside area into a vibrant neighbourhood and visitor destination. Secure Creekside's continued role in accommodating boating communities, including boat dwellings. Enhance public access to the river, including by repairing breaks in the Thames Path and Waterlink Way where appropriate and safe to do so, as well as enabling river bus services at Convoys Wharf."

- Site Allocation 1: Convoys Wharf Mixed-Use Employment Location proposed addition to the development guidelines section:

"The proposed residential development located in close proximity to the safeguarded Convoys Wharf must be designed to minimise the potential for conflicts of use and disturbance, including utilising the site layout, building orientation, uses and appropriate materials to design out potential conflicts, and implementing appropriate mitigation measures if required in line with the Agent of Change principle."

- Site 2: Deptford Landings Mixed-Use Employment Location (formerly known as Oxestalls Road) and Scott House proposed addition to the development guidelines section:

"The proposed residential development located in close proximity to the safeguarded Convoys Wharf must be designed to minimise the potential for conflicts of use and disturbance, including utilising the site layout, building orientation, uses and appropriate materials to design out potential conflicts, and implementing appropriate mitigation measures if required in line with the Agent of Change principle."

Michael Atkins

What is your organisation? - Organisation Port of London Authority

To which part of the High Quality Design chapter does you representation relate? (Representations must be made on a specific policy within the High Quality Design chapter. Please state the policy number and name in the box below) - Policy number and name QD7: Amenity and Agent of Change.

Do you consider that this part of the High Quality Design chapter is legally compliant: - Do you consider that this part of the High Quality Design chapter is legally compliant Yes

Do you consider that this part of the High Quality Design chapter is sound - Do you consider that this part of the High Quality Design chapter is sound No

Do you consider that this part of the High Quality Design chapter is compliant with the Duty to Cooperate - Do you consider that this part of the High Quality Design chapter is compliant with the duty to co-operate

Yes

Please give details of why you consider this part of the High Quality Design chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate.

- give details of why you consider this part of the High Quality Design chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate.

In principle support policy QD7, which states that development proposals must clearly demonstrate how noise and other nuisances will be mitigated and managed and must comply with the Agent of Change principle in accordance with the London Plan.

However, it is considered that the supporting text at paragraph 5.58 must be expanded to include a specific reference that the Agent of Change principle should be applied to all noise-generating uses including industrial areas and safeguarded wharves, and that noise sensitive uses located in close proximity to such sites (including vacant wharves) must be designed to minimise the potential for conflicts of use and disturbance. This would ensure the policy in in line with regional and national policy including policies D12 (Agent of Change) and SI15 (Water Transport) of the London Plan, and paragraph 187 of the National Planning Policy Framework (NPPF).

With regard to artificial lighting, welcome that this policy now makes clear that development proposals adjacent to the River Thames must ensure that artificial lighting will not have an adverse impact on river navigation, and also consider water habitats with regard to light spill

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

Proposed amendment to paragraph 5.58 is as follows:

"Noise generating cultural and community venues (such as theatres, concert halls, pubs and live music venues), as well as other noise generating uses in Industrial Areas and Safeguarded Wharves should be protected for the benefit of the wider community and the local economy"

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Participate in examination hearing No (I do not wish to participate in an examination hearing session)

To which part of the Sustainable Design & Infrastructure chapter does you representation relate? (Representations must be made on a specific policy within the Sustainable Design & Infrastructure chapter. Please state the policy number and name in the box below) - Policy name/number Policy SD9: Lewisham's Waterways

Do you consider that this part of the Sustainable Design & Infrastructure chapter is legally compliant: - legally compliant
Yes

Do you consider that this part of the Sustainable Design & Infrastructure chapter is sound - sound No

Please give details of why you consider this part of the Sustainable Design & Infrastructure chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments

Support the amendments made to part E of the policy which states that the Council will continue to safeguard Convoys Wharf taking into account the Ministerial Safeguarding Direction for the wharf and extant planning consents, however in order to consistent with regional policy it is recommended that supporting paragraph is updated to directly refer to Convoys Wharf.

Furthermore, the supporting text must include specific reference to the need for adjacent and nearby development proposals to be designed to minimise the potential for conflicts of use and disturbance, in line with the Agent of Change principle and London policy SI15, to ensure that the long term use and viability of the safeguarded wharf, which could operate over 24 hours a day in line with the tides is not constrained which could result in the wharf becoming unviable for waterborne freight cargo handling.

In addition, the key for figure 11.4 (Safeguarded Wharf at Convoys Wharf) must be amended as to reflect the confirmation of the safeguarded wharf boundary as part of the 2021 Ministerial Direction.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally

compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

Recommended that supporting paragraph 11.59 is amended as follows:

"There is a network of wharves, including Convoys Wharf, along the River Thames that are protected for use as a wharf for waterborne freight cargo handling by a safeguarding Direction issued by the Secretary of State on 1st March 2021".

Proposed wording with regard to Agent of Change principle for the supporting text to SD9:

"Development proposals located in close proximity to the safeguarded Convoys Wharf must be designed to take into account potential future wharf operations, which can take place over 24 hours a day in line with tidal movements, in accordance with the Agent of Change Principle and London Plan policy SI15"

The key to figure 11.4 (Safeguarded Wharf at Convoys Wharf) must be amended as follows:

"Confirmed Safeguarded Wharf Boundary"

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Participate in examination hearing No (I do not wish to participate in an examination hearing session)

To which part of the Lewisham North Area chapter does you representation relate? (Representations must be made on a specific policy within the Lewisham's North Area chapter. Please state the policy number and name in the box below) - Policy name/number Key Spatial Principles / Site Allocation 1: Convoys Wharf Mixed-Use Employment Location / Site Allocation 2 Deptford Landings Mixed-Use Employment Location (formerly known as Oxestalls Road) and Scott House.

Do you consider that this part of the Lewisham North Area chapter is legally compliant: - legally compliant

Yes

Do you consider that this part of the Lewisham North Area chapter is sound - Soundness No

Do you consider that this part of the Lewisham North Area chapter is compliant with the Duty to Co-operate - Duty to Co-operate
Yes

Please give details of why you consider this part of the Lewisham North Area chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments

- Figure 15.2 (North Area key diagram)

To ensure consistency with regional policy, figure 15.2 (North Area key diagram) must be updated to highlight the safeguarded wharf boundary for Convoys Wharf, and the proposed riverbus stop at

Convoys wharf.

- Key spatial objective 10:

With regard to spatial objective 10 and the Thames Path. Whilst the PLA in principle supports the aim to enhance public access to the river, including by repairing breaks in the Thames Path. It must be recognised how in some cases there can be challenges in finding the best route near operational wharves and industrial areas, and that this will require a pragmatic solution to achieving appropriate, safe access around these sites. An amendment is therefore proposed to key spatial objective 10

- Site Allocation 1: Convoys Wharf Mixed-Use Employment Location.

PLA consider that the development guidelines section must be amended to state that as part of the proposed development and forthcoming Reserved Matters applications, the proposed residential development located in close proximity to the Safeguarded Wharf must be designed to minimise the potential for conflicts of use and disturbance, including by utilising the site layout, building orientation, uses and appropriate materials to design out potential conflicts, as well as implement any required mitigation measures in line with the Agent of Change principle to ensure future residents are protected, and that future wharf operators can operate without risk of nuisance complaint. This would be consistant with regional policy in the London Plan (SI15) and would also be in line with other Local Plan site allocations include sites 18 and 19 which do recognise this issue.

- Site 2: Deptford Landings Mixed-Use Employment Location (formerly known as Oxestalls Road) and Scott House.

As with allocation 1 in order to ensure consistancy with the London Plan the development guidelines section must be also be amended here to state that as part of the proposed residential development located in close proximity to the Safeguarded Wharf, this must be designed to minimise the potential for conflicts of use and disturbance, including by utilising the site layout, building orientation, uses and appropriate materials to design out potential conflicts, and implement any required mitigation measures in line with the Agent of Change principle.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

- Figure 15.2 (North Area key diagram):

Must be updated to include the safeguarded wharf boundary and the proposed riverbus stop at Convoys wharf.

- Key spatial objective 10 proposed amendment:

"Maximise the recreational and amenity value of the River Thames and Deptford Creekside by transforming the riverside area into a vibrant neighbourhood and visitor destination. Secure Creekside's continued role in accommodating boating communities, including boat dwellings. Enhance public access to the river, including by repairing breaks in the Thames Path and Waterlink Way where appropriate and safe to do so, as well as enabling river bus services at Convoys Wharf."

- Site Allocation 1: Convoys Wharf Mixed-Use Employment Location proposed addition to the development guidelines section:

"The proposed residential development located in close proximity to the safeguarded Convoys Wharf must be designed to minimise the potential for conflicts of use and disturbance, including utilising the site layout, building orientation, uses and appropriate materials to design out potential conflicts, and implementing appropriate mitigation measures if required in line with the Agent of Change principle."

- Site 2: Deptford Landings Mixed-Use Employment Location (formerly known as Oxestalls Road) and Scott House proposed addition to the development guidelines section:

"The proposed residential development located in close proximity to the safeguarded Convoys Wharf must be designed to minimise the potential for conflicts of use and disturbance, including utilising the site layout, building orientation, uses and appropriate materials to design out potential conflicts, and implementing appropriate mitigation measures if required in line with the Agent of Change principle."



To which part of the Lewisham Central Area chapter does you representation relate? (Representations must be made on a specific policy or site allocation within the Lewisham Central Area chapter. Please state the policy number and name in the box below) - Policy name/number House on the Hill and Slaithwaite Road

Do you consider that this part of the Lewisham Central Area chapter is legally compliant: - Legally Compliant

Yes

Do you consider that this part of the Lewisham Central Area chapter is sound - SoundnessNo

Do you consider that this part of the Lewisham Central Area chapter is compliant with the Duty to Co-operate - Duty to Co-operate

No

Please give details of why you consider this part of the Lewisham Central Area chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments

Duty to Cooperate - I am a local resident, and do not feel that information on the council's plans around House on the Hill at Slaithwaite Road was adequately provided to myself and my neighbours (living on Slaithwaite Road and Clarendon Rise. We were not provided clear and transparent information or the opportunity to feed in our thoughts and concerns. Most of us are not in the habit of repeatedly checking the Lewisham council website to check for local planning updates, so it would not occur to us to seek out information on House on the Hill. A small white piece of paper informing us of the consultation was posted outside the property, but for most local residents (including myself), this would not have been noticed. It would have been much better to send local residents information through the post to keep us looped in on consultations etc. As such, most of us were unable to get to the stage of feeding in views and concerns within the consultation window. It was only through word of mouth, at the last minute, that I found out about this consultation. The opinion of local residents matters, because we are best placed to inform the council on idiosyncrasies of and issues within the local area that need to be borne in mind.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

It will be necessary to ensure that, following the construction of a new residential building, traffic does not increase materially, nor car pollution or noise pollution. Moreover, provisions must be made to ensure that access to local services (such as doctors, dentists, nurseries, etc.) are not further constrained by greater demand not being met by greater supply. Finally, the construction should not be too high, to preserve adequate sunlight reaching neighbouring properties.

Jonathan Sharif

To which part of the Housing chapter does you representation relate? (Representations must be made on a specific policy within the Housing chapter. Please state the policy number and name in the box below) - Policy name / number HO1

Do you consider that this part of the Housing chapter is legally compliant: - Legally compliant No

Do you consider that this part of the Housing $\,$ chapter is sound - sound $\,$ No $\,$

Do you consider that this part of the Housing chapter is compliant with the Duty to Co-operate - Duty to co-operate

No

Please give details of why you consider this part of the Housing chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments

Local neighbouring residents who will be directly effected by the proposed housing developments have not been properly consulted regarding the impact of new housing next door to their existing long-term dwellings. The implications of this include; anti-social behaviour, pollution and criminality, amongst various other issues.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

Local neighbouring residents should be consulted and remedies agreed before developments start.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: - Please explain below

Yes, I would like to participate in the hearing sessions in order that the voices and opinions of local neighbouring residents to these developments are heard and properly considered.

Tom Clarke MRTPI

What is your organisation? - Organisation

Theatres Trust

To which part of the High Quality Design chapter does you representation relate? (Representations must be made on a specific policy within the High Quality Design chapter. Please state the policy number and name in the box below) - Policy number and name QD7 Amenity and agent of change

Do you consider that this part of the High Quality Design chapter is legally compliant: - Do you consider that this part of the High Quality Design chapter is legally compliant Yes

Do you consider that this part of the High Quality Design chapter is sound - Do you consider that this part of the High Quality Design chapter is sound Yes

Do you consider that this part of the High Quality Design chapter is compliant with the Duty to Cooperate - Do you consider that this part of the High Quality Design chapter is compliant with the duty to co-operate

Yes

Please give details of why you consider this part of the High Quality Design chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate.

- give details of why you consider this part of the High Quality Design chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate.

We remain supportive of this policy

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Participate in examination hearing No (I do not wish to participate in an examination hearing session)

To which part of the Community Infrastructure chapter does you representation relate? (Representations must be made on a specific policy within the Community Infrastructure chapter. Please state the policy number and name in the box below) - Policy name/number CI1 Safeguarding and securing community infrastructure

Do you consider that this part of the Community Infrastructure chapter is legally compliant: - legally compliant

Yes

Do you consider that this part of the Community Infrastructure chapter is sound - sound Yes

Do you consider that this part of the Community Infrastructure chapter is compliant with the Duty to Co-operate - Duty to Co-operate

Yes

Please give details of why you consider this part of the Community Infrastructure chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments

We remain supportive of this policy and its support and protection of valued facilities.

We would however urge minor amendment to paragraph 9.1 so that cultural facilities are referenced as examples of community infrastructure covered by the policy, particularly as the site allocation for the Albany Theatre (Site 15) references the need to accord with this policy if reprovision is proposed.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

Amend paragraph 9.1 to refer to cultural facilities.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Participate in examination hearing No (I do not wish to participate in an examination hearing session)

To which part of the Lewisham Central Area chapter does you representation relate? (Representations must be made on a specific policy or site allocation within the Lewisham Central Area chapter. Please state the policy number and name in the box below) - Policy name/number LCA3 Catford major centre and surrounds

Do you consider that this part of the Lewisham Central Area chapter is legally compliant: - Legally Compliant

Yes

Do you consider that this part of the Lewisham Central Area chapter is sound - Soundness Yes

Do you consider that this part of the Lewisham Central Area chapter is compliant with the Duty to Co-operate - Duty to Co-operate
Yes

Please give details of why you consider this part of the Lewisham Central Area chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to

support the legal compliance or soundness of the Plan, or its compliance with the duty to cooperate, please also use this text box to set out your comments

We continue to support this policy with regards to its support for the Broadway Theatre.

To which part of the Lewisham North Area chapter does you representation relate? (Representations must be made on a specific policy within the Lewisham's North Area chapter. Please state the policy number and name in the box below) - Policy name/number 15 Albany Theatre

Do you consider that this part of the Lewisham North Area chapter is legally compliant: - legally compliant

Yes

Do you consider that this part of the Lewisham North Area chapter is sound - Soundness No

Do you consider that this part of the Lewisham North Area chapter is compliant with the Duty to Co-operate - Duty to Co-operate

Yes

Please give details of why you consider this part of the Lewisham North Area chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments

Whilst the site allocation seeks retention of the Albany, we noted in our previous comments there is a need to protect the theatre (and ensure suitable living conditions for occupants) by protecting from future conflict with new residents. This applies whether the theatre remains in its current space or elsewhere at the site. We recommend the addition of text highlighting the need to consider the Agent of Change principle including for the theatre's access and servicing needs. Our recommendations were taken forward at Site Allocation 19 (Laurence House and Civic Centre) and they should similarly be integrated here to ensure development is sustainable and that suitable living standards can be achieved for future occupants.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

Addition of text on protecting the theatre and its wider operational needs, such as: "Development should be designed to protect the amenity of residential properties, taking into account the theatre's out of hours' access and servicing needs, in line with the Agent of Change principle".

Bridget Fox

What is your organisation? - Organisation

The Woodland Trust

To which part of the Green Infrastructure chapter does you representation relate? (Representations must be made on a specific policy within the Green Infrastructure chapter. Please state the policy number and name in the box below) - Policy name/number GR1, GR3, GR5

Do you consider that this part of the Green Infrastructure chapter is legally compliant: - legally compliant

Yes

Do you consider that this part of the Green Infrastructure chapter is sound - sound Yes

Do you consider that this part of the Green Infrastructure chapter is compliant with the Duty to Co-operate - Co-operate

Yes

Please give details of why you consider this part of the Green Infrastructure chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments

GR1 The Woodland Trust welcomes this policy, in particular section B requiring "provision of sufficient space where large canopy trees can be retained and new trees established without pressure for their future removal." This is line with para 131 of the NPPF which recognises the value of trees and encourages policies for their long-term survival.

GR3 The Woodland Trust supports this policy and welcomes the wording referring to the emerging requirement for Local Nature Recovery Strategies in section A, which will make this policy sounder for the long term. We would like to see the policy strengthened with explicit reference to protection of irreplaceable habitats in line with para 180c of the NPPF.

GR5 The Woodland Trust strongly supports this policy, in particular section C on the Urban Greening Factor and sections E and F which provide for the protection of existing trees and the provision of additional trees, in line with para 131 of the NPPF.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

GR3 We propose rewording para B as follows: change "They must also protect and conserve protected and priority habitats and species that sit outside of the SINC network," to read "They must also protect and conserve irreplaceable habitats, protected and priority habitats, and species that sit outside of the SINC network," to ensure that there is an explicit reference to irreplaceable habitats in the policy.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Participate in examination hearing No (I do not wish to participate in an examination hearing session)

To which part of the Lewisham South Area chapter does you representation relate? (Representations must be made on a specific policy within the Lewisham South Area chapter. Please state the policy number and name in the box below) - Policy name/number Site allocation 8: Land at Pool Court

Do you consider that this part of the Lewisham South Area chapter is legally compliant: - Legally Compliant

Yes

Do you consider that this part of the High Quality Design chapter is sound - Soundness Yes

Do you consider that this part of the Lewisham South Area chapter is compliant with the Duty to Co-operate - Duty to Co-operate
Yes

Please give details of why you consider this part of the Lewisham South Area chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments

Ancient woodland is recognised as an irreplaceable habitat which must be protected from development unless there are exceptional circumstances and suitable compensation is provided (NPPF para 180c). Ancient and veteran trees outside woods have the same legal protection as ancient woodland, and require suitable buffer zones and root protection areas to be specified.

There is a veteran Crack Willow tree recorded on the Ancient Tree Inventory (Tree ID: ID232560) at grid reference TQ3730273027, which is either within or adjacent to this proposed development site. We note that the policy in 17.43 section 2 says "Development proposals must protect and seek to enhance green infrastructure and biodiversity, including the SINC."

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

We request that the wording "and any ancient or veteran trees" be added after "the SINC". This will improve compliance with national policy by protecting such trees from loss or fragmentation and from harmful effects of pollution or encroachment on root areas. It will also make a positive contribution to requirements for net gain and nature recovery, as well as better reflecting the aspirations of the England Trees Action Plan and National Model Design Code.

Camilla Barlow

To which part of the Green Infrastructure chapter does you representation relate? (Representations must be made on a specific policy within the Green Infrastructure chapter. Please state the policy number and name in the box below) - Policy name/number GR3 Biodiversity and access to nature

Do you consider that this part of the Green Infrastructure chapter is legally compliant: - legally compliant

Yes

Do you consider that this part of the Green Infrastructure chapter is sound - sound No

Do you consider that this part of the Green Infrastructure chapter is compliant with the Duty to Co-operate - Co-operate

Yes

Please give details of why you consider this part of the Green Infrastructure chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments

The Biodiversity Action Plan at section 10.13 states: "Access to nature is a key component of living in an urban environment as it offers opportunities for respite, relaxation and education. Lewisham residents generally benefit from good access to green and open spaces...........Where new development

comes forward opportunities should be taken to introduce additional biodiversity features across the Borough, and particularly in the areas of deficiency".

It is important to include a list of examples of ecological enhancements that will provide the biodiversity, such as integrated bird, bat and bee bricks, hedgehog highways and reptile refugia/logpiles etc. The governement recognises the importance of bird bricks (which are not included in the Biodiversity Net Gain Metric), and expects local authorities to condition them separately.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

N/A

Will Martin

What is your organisation? - Organisation w2m Planning

To which part of the Economy and Culture chapter does you representation relate? (Representations must be made on a specific policy within the Housing chapter. Please state the policy number and name in the box below) - Policy name/number EC3

Do you consider that this part of the Economy and Culture chapter is legally compliant: - legally compliant

Yes

Do you consider that this part of the Economy and Culture chapter is sound - sound $\ensuremath{\mathsf{No}}$

Do you consider that this part of the Economy and Culture chapter is compliant with the Duty to Co-operate - Duty to Co-operate

Yes

Please give details of why you consider this part of the Economy and Culture chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments

The policy allows for live work units to be developed within areas and on sites which have viable business users already occupying them. The policy is to heavily in favour of redevelopment of these sites where justification of the protection existing businesses could be demonstrated on economic development grounds. Unfortunately traditional businesses and supply chains are being forced from the area with their sites being redeveloped, this in turn is reducing the diversity of businesses supported in the area.

We would note that such a site is 111-115 Endwell Road, which whilst proposing employment floorspace is also allowing live / work units which is likely to result in the existing leasehold business being removed from the site and this supply chain being lost from the district.

(Names have been redacted from Commonplace responses for the time being due to Commonplace's GDPR regulations. Names of respondents will be made available for the examination submission)

Commonplace Response 1

- 1.To which part of the Green Infrastructure chapter does you representation relate? (Representations must be made on a specific policy within the Green Infrastructure chapter. Please state the policy number and name in the box below) Green Infrastructure GR3 Biodiversity and access to nature
- 2. Do you consider that this part of the Green Infrastructure chapter is legally compliant? Green Infrastructure

Yes

3. Do you consider that this part of the Green Infrastructure chapter is sound? - - Green Infrastructure

No

4. Do you consider that this part of the Green Infrastructure chapter is compliant with the Duty to Co-operate? - Green Infrastructure

Yes

5. Please give details of why you consider this part of the Green Infrastructure chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) - Green Infrastructure Reference in 10.13 to the Biodiversity Action Plan (BAP) is welcome as this covers ecologically important items such as swift bricks

(the government refers to these as "species features" in their latest Biodiversity Net Gain (BNG) consultation response (March 2023), where they confirm that these species features are not included in the BNG metric and local authorities must condition them independently), which are not covered by Biodiversity Net Gain, Urban Greening or Green Infrastructure. However, 10.13 is not fully sound as there is a typo (missing "to"), and applicants "must" refer to the BAP, and please for clarity provide a reference to swift bricks in the Local Plan itself.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible - Green Infrastructure Final sentence of 10.13 to read:

Applicants must refer to the latest Lewisham Biodiversity Action Plan, currently A Natural Renaissance for Lewisham (2021), which sets out information on the vision and opportunities for the borough including requirements for important species features such as swift bricks which are not included in the Biodiversity Net Gain calculation.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? -Green Infrastructure

Yes (I do wish to participate in an examination hearing session)

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary - Green Infrastructure

To provide further information, if it is required.

- 1.To which part of the Lewisham's North Area chapter does you representation relate? (Representations must be made on a specific policy within the Lewisham's North Area chapter. Please state the policy number and name in the box below) Lewisham's North Area All parts
- 2. Do you consider that this part of the Lewisham's North Area chapter is legally compliant? - Lewisham's North Area
 No
- 3. Do you consider that this part of the Lewisham's North Area chapter is sound? Lewisham's North Area
 No
- 4. Do you consider that this part of the Lewisham's North Area chapter is compliant with the Duty to Co-operate? Lewisham's North Area
 No
- 5. Please give details of why you consider this part of the Lewisham's North Area chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) -Lewisham's North Area Convoys Wharf has been sitting empty for too long. Strategy needs to include a start and end date for this development (or revoke all planning permissions).
- 6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible Lewisham's North Area See above
- 7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? {63e24470ce7cace3c9f44930} Lewisham's North Area

No (I do not wish to participate in an examination hearing session)

1.To which part of the Sustainable Design & Infrastructure chapter does you representation relate? (Representations must be made on a specific policy within the Sustainable Design & Infrastructure chapter. Please state the policy number and name in the box below) - Sustainable Design & Infrastructure

5 qd 1 Design

- 2. Do you consider that this part of the Sustainable Design & Infrastructure chapter is legally compliant? Sustainable Design & Infrastructure
 No
- 3. Do you consider that this part of the Sustainable Design & Infrastructure chapter is sound? Sustainable Design & Infrastructure

 No
- 4. Do you consider that this part of the Sustainable Design & Infrastructure chapter is compliant with the Duty to Co-operate? Sustainable Design & Infrastructure

 No
- 5. Please give details of why you consider this part of the Sustainable Design & Infrastructure chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) Sustainable Design & Infrastructure

Nowhere in building design does it address or require buildings to include passive cooling such as sun shields etc. London is getting hotter and to buildings need passive solar and ventilation cooling designs. Otherwise people will be forced to install and use air conditioning, adding to climate change.

- 6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible Sustainable Design & Infrastructure Need to specify passive solar/air cooling in all new builds.
- 7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? Sustainable Design & Infrastructure

 No (I do not wish to participate in an examination hearing session)

- 1.To which part of the Transport and Connectivity chapter does you representation relate? (Representations must be made on a specific policy within the Transport and Connectivity chapter. Please state the policy number and name in the box below) -Transport and Connectivity TR3
- 2. Do you consider that this part of the Transport and Connectivity chapter is legally compliant? - Transport and Connectivity

Yes

3. Do you consider that this part of the Transport and Connectivity chapter is sound? - Transport and Connectivity

Yes

- **4.** Do you consider that this part of the Transport and Connectivity chapter is compliant with the Duty to Co-operate? Transport and Connectivity
 No
- 5. Please give details of why you consider this part of the Transport and Connectivity chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) Transport and Connectivity Does not address the problem of bins being left out on streets all week.
- 6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible Transport and Connectivity Strategy needs to include something on ensuring residents don't leave bins out on streets. This is a hazard to those with disabilities, elderly and with children. Council needs a plan to ensure pavements are kept clear and this is enforced.
- 7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? Transport and Connectivity

 No (I do not wish to participate in an examination hearing session)

- 1.To which part of the Lewisham's North Area chapter does you representation relate? (Representations must be made on a specific policy within the Lewisham's North Area chapter. Please state the policy number and name in the box below) Lewisham's North Area Lna1
- 2. Do you consider that this part of the Lewisham's North Area chapter is legally compliant? - Lewisham's North Area
 Yes
- 3. Do you consider that this part of the Lewisham's North Area chapter is sound? Lewisham's North Area
 No
- **4.** Do you consider that this part of the Lewisham's North Area chapter is compliant with the Duty to Co-operate? -Lewisham's North Area No
- 5. Please give details of why you consider this part of the Lewisham's North Area chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) -Lewisham's North Area The plans do not include anything on safer/clear streets. Local residents not removing bins from outside their homes and leaving permanently on streets causes significant problems for elderly people, those with disabilities and young children. There is no point in talking about cleaner streets in terms of trees etc unless this is also addressed.
- 6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible -Lewisham's North Area See above.
- 7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? Lewisham's North Area

 No (I do not wish to participate in an examination hearing session)

3. Do you consider that this part of the Planning for an Open Lewisham chapter is sound? - Part 1: Planning for an Open Lewisham

Yes

- 1.To which part of the Economy and Culture chapter does you representation relate? (Representations must be made on a specific policy within the Economy and Culture chapter. Please state the policy number and name in the box below) Economy and Culture EC15
- 2. Do you consider that this part of the Economy and Culture chapter is legally compliant? Economy and Culture

No

3. Do you consider that this part of the Economy and Culture chapter is sound? - Economy and Culture

No

4. Do you consider that this part of the Economy and Culture chapter is compliant with the Duty to Co-operate? Economy and Culture

No

- 5. Please give details of why you consider this part of the Economy and Culture chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) Economy and Culture Redesign has to take more consideration of consultation from people living in the area as well as implement local council run outlets and properties NOT privatised sanitised wastelands of gated exclusion.
- 6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible Economy and Culture Lewisham Local Council maintains ownership of the project thereby protecting the interests by upholding the democratic process of local residents at all times.
- 7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? Economy and Culture

 Yes (I do wish to participate in an examination hearing session)
- 8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary - Economy and Culture

I am an owner occupier living in the Borough of Lewisham and any development will impact me as well as all other residents of the Borough.

- 1.To which part of the High Quality Design chapter does you representation relate? (Representations must be made on a specific policy within the High Quality Design chapter. Please state the policy number and name in the box below) High Quality Design QD4Building heights
- 2. Do you consider that this part of the High Quality Design chapter is legally compliant? High Quality Design

Yes

3. Do you consider that this part of the High Quality Design chapter is sound? - High Quality Design

Yes

4. Do you consider that this part of the High Quality Design chapter is compliant with the Duty to Co-operate? - High Quality Design
No

5. Please give details of why you consider this part of the High Quality Design chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please

Lewisham has a recent history of allowing high rise properties that fail to conform to a High Quality standard, and also compromise the local environment with particular relations to light and air movement standards.

also use this text box to set out your comments) - High Quality Design

- 6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible High Quality Design Plans for any high rise require much more careful modelling to justify the claims to be legally compliant.
- 7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? High Quality Design
 No (I do not wish to participate in an examination hearing session)

- 1.To which part of the Green Infrastructure chapter does you representation relate? (Representations must be made on a specific policy within the Green Infrastructure chapter. Please state the policy number and name in the box below) Green Infrastructure GR6
- 2. Do you consider that this part of the Green Infrastructure chapter is legally compliant? Green Infrastructure

Yes

3. Do you consider that this part of the Green Infrastructure chapter is sound? - Green Infrastructure

No

4. Do you consider that this part of the Green Infrastructure chapter is compliant with the Duty to Co-operate? - Green Infrastructure
Yes

- 5. Please give details of why you consider this part of the Green Infrastructure chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) Green Infrastructure

 Whilst strong focus on trees is welcome, it ignores wildflowers and flowering plants more generally which support bees etc. Trees alone will not help insect life we need nectar sources too. Insects are the basis for wider biodiversity.
- 6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible Green Infrastructure Include planting of year-round nectar sources, not just trees.
- 7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? Green Infrastructure

 No (I do not wish to participate in an examination hearing session)

- 1.To which part of the Transport and Connectivity chapter does you representation relate? (Representations must be made on a specific policy within the Transport and Connectivity chapter. Please state the policy number and name in the box below) Transport and Connectivity G17. Healthy and Safe Communities
- 2. Do you consider that this part of the Transport and Connectivity chapter is legally compliant? Transport and Connectivity

 No
- 3. Do you consider that this part of the Transport and Connectivity chapter is sound? Transport and Connectivity
 No
- 4. Do you consider that this part of the Transport and Connectivity chapter is compliant with the Duty to Co-operate? Transport and Connectivity

 No
- 5. Please give details of why you consider this part of the Transport and Connectivity chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) -- Transport and Connectivity It's unsound because it refers to the "Healthy Streets Approach" which is not defined. The whole section is a wishy-washy jumble of meaningless words with few specific applications.
- 6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible Transport and Connectivity To make it sound it needs totally rewriting into plain English.
- 7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? Transport and Connectivity

 No (I do not wish to participate in an examination hearing session)

- 1.To which part of the Planning for an Open Lewisham chapter does you representation relate? (Representations must be made on a specific policy within the Planning for an Open Lewisham chapter. Please state the policy number and name in the box below) - Part 1: Planning for an Open Lewisham
- A1 . I do not understand what is meant by "an Open Lewisham". Meaningless words not defined anywhere.
- 2. Do you consider that this part of the Planning for an Open Lewisham chapter is legally compliant?- Part 1: Planning for an Open Lewisham

 No
- 3. Do you consider that this part of the Planning for an Open Lewisham chapter is sound? - Part 1: Planning for an Open Lewisham
 No
- 4. Do you consider that this part of the Planning for an Open Lewisham chapter is compliant with the Duty to Co-operate? Part 1: Planning for an Open Lewisham

 No
- 5. Please give details of why you consider this part of the Planning for an Open Lewisham chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) -Part 1: Planning for an Open Lewisham

It cannot be compliant because it is not defined and is meaningless.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Part 1: Planning for an Open Lewisham

No (I do not wish to participate in an examination hearing session)

- 1.To which part of the Lewisham's Central Area chapter does you representation relate? (Representations must be made on a specific policy within the Lewisham's Central Area chapter. Please state the policy number and name in the box below) Lewisham's Central Area None
- 5. Please give details of why you consider this part of the Lewisham's Central Area chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) Lewisham's Central Area Hither Green is ignored. The shops and pavements along Springbank Road have not been identified as an area for investment at all.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible - Transport and Connectivity I would like to see the prioritisation of Grove Park station being re designated as zone 2/3 like all other stations in the borough.

2. Do you consider that this part of the Green Infrastructure chapter is legally compliant? - - Green Infrastructure

No

3. Do you consider that this part of the Green Infrastructure chapter is sound? - - Green Infrastructure

No

4. Do you consider that this part of the Green Infrastructure chapter is compliant with the Duty to Co-operate? - Green Infrastructure

No

- 5. Please give details of why you consider this part of the Green Infrastructure chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) Green Infrastructure

 Lewisham needs to not just apply hollow words on green infrastructure. The Borough is still destroying mature trees. Green infrastructure is also about prioritising walking and cycling etc over cars, so would like to see closure of traffic rat runs.
- 6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible Green Infrastructure

 See above. Lewisham should not destroy mature trees without the local consent of the community. The poor air quality in the Borough makes this a priority
- 7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? Green Infrastructure

 No (I do not wish to participate in an examination hearing session)

- 1.To which part of the Transport and Connectivity chapter does you representation relate? (Representations must be made on a specific policy within the Transport and Connectivity chapter. Please state the policy number and name in the box below) -Transport and Connectivity TR4
- 2. Do you consider that this part of the Transport and Connectivity chapter is legally compliant? Transport and Connectivity

 Yes
- 3. Do you consider that this part of the Transport and Connectivity chapter is sound? - Transport and Connectivity
 No
- **4.** Do you consider that this part of the Transport and Connectivity chapter is compliant with the Duty to Co-operate? Transport and Connectivity
 Yes
- 5. Please give details of why you consider this part of the Transport and Connectivity chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to cooperate, please also use this text box to set out your comments) - Transport and Connectivity This part of the document mentions disability only twice as far as I can see; considering you have have a large hospital in your area I would expect to see many more references to disabled people and their difficulties with transport. Many need door to door facilities and will require suitable parking at their residence and also at various clinics around the borough. Young mothers with young children (some also disabled) unable yet to walk also require good reliable transport so they are not waiting at bus stops in the cold; primary children of varying ages will require dropping off to different schools & nursery which will not be practical by bus for single parent families with the parent then still having to make their way to work after the school run. Some allowance must be made for them to travel by car. As the family becomes older they may well be able to travel in a more environmentally way but will still need to park their bikes safely a/ at home - a single car space would be suitable for a family of 4 bicycles so they will still require plans for that space linked to their residence and b/ secure spaces at work and school.

You do mention cargo bikes which is a small step in the right direction but these will require a larger area of dedicated secure parking at home & work and not everybody can afford a garden or garage.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible - Transport and Connectivity If you are serious about about making travel greener you also have to make it family friendly so allow young families to use a car when the children are young, then encourage them onto bikes and buses when they are older. Consider a school bus or subsidise schools who supply them for example. You have to make allowances for the disabled in the community for door to door travel in the form

of disabled parking space % in residences and in hospitals and clinics for the end of their journey. Unfortunately I will not be able to participate in the hearing in person but would be able to attend on Teams or zoom (which would be more environmentally friendly too). Thanks for listening......

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? -Transport and Connectivity

Yes (I do wish to participate in an examination hearing session)

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary - Transport and Connectivity

I can attend virtually. There is a perception in this borough that you do not listen to the public when making this type of decision - we need to be future proof and have input from all sections of the community; the appearance is that you have excluded the disabled people with little mention of them in this Transport plan. You can rectify that by allowing, no encouraging them, to attend and actually hear their feedback and virtually is the way to go.

Also children do not have a voice here - you should ask at schools for suggestions too. If the child wishes to bike to school then the parent/guardian will be the person to facilitate this, and you have to facilitate them.

1.To which part of the Heritage chapter does you representation relate? (Representations must be made on a specific policy within the Heritage chapter. Please state the policy number and name in the box below) - Heritage

Lewisham Hermitage

- 2. Do you consider that this part of the Heritage chapter is legally compliant?- Heritage Yes
- **3. Do you consider that this part of the Heritage chapter is sound? Heritage** Yes
- 4. Do you consider that this part of the Heritage chapter is compliant with the Duty to Co-operate?- HeritageYes
- 5. Please give details of why you consider this part of the Heritage chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) Heritage

 Keeping the Boroughs heritage is vital as our heritage is important not only now but for future
- Keeping the Boroughs heritage is vital as our heritage is important not only now but for future generations.
- 6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible -Heritage

 Make Lewisham heritage an important part of any future improvements to the Borough of Lewisham
- 7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? Heritage

No (I do not wish to participate in an examination hearing session)

- 1.To which part of the Transport and Connectivity chapter does you representation relate? (Representations must be made on a specific policy within the Transport and Connectivity chapter. Please state the policy number and name in the box below) Transport and Connectivity TR4
- 2. Do you consider that this part of the Transport and Connectivity chapter is legally compliant? Transport and Connectivity

 Yes
- 3. Do you consider that this part of the Transport and Connectivity chapter is sound? Transport and Connectivity
 No
- 4. Do you consider that this part of the Transport and Connectivity chapter is compliant with the Duty to Co-operate? Transport and Connectivity
 Yes
- 5. Please give details of why you consider this part of the Transport and Connectivity chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) Transport and Connectivity It is unsound because restrictions and resident parking zones will badly effect those who can't cycle.this includes families, older people and those offering lifts and services.
- 6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible -- Transport and Connectivity See above
- 7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? Transport and Connectivity

 No (I do not wish to participate in an examination hearing session)

1.To which part of the Planning for an Open Lewisham chapter does you representation relate? (Representations must be made on a specific policy within the Planning for an Open Lewisham chapter. Please state the policy number and name in the box below) - - Part 1: Planning for an Open Lewisham

Being open and transparent

- 2. Do you consider that this part of the Planning for an Open Lewisham chapter is legally compliant? Part 1: Planning for an Open Lewisham
 Yes
- 3. Do you consider that this part of the Planning for an Open Lewisham chapter is sound? - Part 1: Planning for an Open Lewisham
 Yes
- 4. Do you consider that this part of the Planning for an Open Lewisham chapter is compliant with the Duty to Co-operate? Part 1: Planning for an Open Lewisham

 Yes
- 5. Please give details of why you consider this part of the Planning for an Open Lewisham chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) Part 1: Planning for an Open Lewisham

We need to be open and transparent to represent every one in the Borough of Lewisham

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible - Part 1: Planning for an Open Lewisham

To be honest open and transparent to represent everyone who lives works or visits the Borough of Lewisham

- 1.To which part of the Transport and Connectivity chapter does you representation relate? (Representations must be made on a specific policy within the Transport and Connectivity chapter. Please state the policy number and name in the box below) -Transport and Connectivity Increase journeys by walking cycling anc public transport
- 2. Do you consider that this part of the Transport and Connectivity chapter is legally compliant? Transport and Connectivity

 Yes
- 3. Do you consider that this part of the Transport and Connectivity chapter is sound? Transport and Connectivity
 Yes
- 4. Do you consider that this part of the Transport and Connectivity chapter is compliant with the Duty to Co-operate? Transport and Connectivity
 Yes
- 5. Please give details of why you consider this part of the Transport and Connectivity chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) Transport and Connectivity We need invest in public transport to support growing local populations and new developments while making public transport sustainable as possible. More use of electric and hydrogen buses. Wider pavements for pedestrians and more cycle lanes for cyclists..
- 6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible -- Transport and Connectivity Improve public transport more frequent buses and new bus routes. Encourage more walking and cycling
- 7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? -Transport and Connectivity

 No (I do not wish to participate in an examination hearing session)

- 1.To which part of the Transport and Connectivity chapter does you representation relate? (Representations must be made on a specific policy within the Transport and Connectivity chapter. Please state the policy number and name in the box below) Transport and Connectivity Parking
- 2. Do you consider that this part of the Transport and Connectivity chapter is legally compliant? - Transport and Connectivity

 No
- 3. Do you consider that this part of the Transport and Connectivity chapter is sound? Transport and Connectivity
 No
- 5. Please give details of why you consider this part of the Transport and Connectivity chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) Transport and Connectivity Strongly oppose any mandatory parking permits in my residtential area
- 6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible Transport and Connectivity Remove any consideration of mandatory residential parking permits in my residential are
- 7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? Transport and Connectivity

 No (I do not wish to participate in an examination hearing session)