

Green Group Response to Core Strategy Options Report

April 2009

Question 6

Do you feel there are any other drivers of change that could have an impact on the preparation of the Core Strategy?

Yes. The issue of oil depletion and how to prepare for it and implement a smooth transition to a post-oil borough will be a crucial driver of change for virtually every aspect of life in Lewisham. It has potentially grave impacts on everything from food security to home heating, healthcare to transport and employment and should be listed as a driver of change prominently, and its implications addressed throughout the LDF.

Question 7

A vision for Lewisham 2025

Do you support the elements that are suggested to contribute to the Core Strategy Vision?

The Green Group considers the following as a more appropriate vision for Lewisham 2025:

Climate change is without doubt the greatest threat facing society. Scientific evidence tells us that by 2020 we need to have taken significant action to avoid extreme and violent changes in climate. Further, oil supplies - which have allowed both great technological advances and hitherto unrivalled material wealth for many people in Lewisham – are facing unprecedented and irreversible decline.

As well as doing everything we can to reduce the impact of climate change, we also have to acknowledge that some changes are inevitable. However effectively we act over the next few years, Lewisham will be affected by a degree of climate change. Given this – and the reality of dwindling oil supplies – we must start work now on planning for a 'Post Carbon Economy' in order to guarantee that Lewisham's residents continue to prosper.

Lewisham's planning policies are crucial in ensuring that we 'do our bit' in reducing the impact of human activities on the climate and in planning for the future. Typically this may involve reducing the need to travel or ensuring that a comprehensive and safe cycle network exists. We also need to consider where food will come from in a post-peak oil future and as a borough will need to make provision for more space for food growing in any housing developments in order to raise our current very low level of food security.

Therefore by 2025:

- *Lewisham will have transformed the town centres of Lewisham and Catford into truly sustainable hubs, delivering excellent public transport, cycling and pedestrian links, zero-carbon, human-scale development, improvements in air quality and a good mix of private and social housing leading to good communities*
- *Lewisham will have in place the relevant infrastructure, including waste facilities, alternative energy generation sites (such as converting the incinerator to biomass) and places where other renewable energy can be harvested*

- *Lewisham's existing housing stock will have been retrofitted with insulation and renewable technology so that they stay warm in the winter and cool in the summer without the need for large energy inputs*
- *Lewisham's approach to construction and development will prioritise homes and buildings with the lowest environmental impact in terms of their construction but just as importantly in terms of the maintenance required, adaptability and energy consumption – buildings that are truly 'carbon-neutral'*
- *Lewisham will have created many new opportunities for the local production of food whether that be through community farms, allotments, orchards, as well as existing gardens*
- *Lewisham will understand our flood defences and work to encourage schemes that transform dead concrete channels into spectacular natural flood plains which protect our town centres from flooding*
- *Lewisham will have a vibrant Green industrial hub that will provide significant jobs and opportunities for local people in both modern technologies and also trades such as building, plumbing, electrical installation that will be needed to implement many of these in our homes, shops and offices*
- *Lewisham will provide good quality industrial space for small and emerging businesses to support the development of Lewisham's local economy*
- *Lewisham will have a strong network of good quality local shopping parades providing shops, services and workshops for repair and reuse that reduce the need to transport goods and people long distances*
- *Lewisham will have a mix of housing tenures across the borough ensuring that we have fairer, more inclusive neighbourhoods with affordable housing, good public transport, an excellent cycle network and facilities for pedestrians.*

With regard to the much over-used phrase of making “Lewisham the best place in London to live, work and learn”. Whilst it is important to work to deliver these ambitions, it is vital that Lewisham in 2025 that can match the challenges of climate change, without which these goals will be impossible to achieve. We suggest an alternative goal:

“A greener and fairer Lewisham. In 2025, Lewisham will be the greenest place in London to live, work and learn”

Question 8

Vision Expression

Do you feel the vision is expressed clearly?

The vision contains much too much jargon and we believe will be inaccessible to many. Such a view was expressed at the Brockley Assembly when this document and the consultation was discussed.

Strategic planning naturally contains technical wording and this vision relies too heavily on such wording. The vision refers to “contributed to better socio-economic outcomes for the local residents” – does this mean people are likely to be “fitter, happier more productive” or simply better off?

Whilst there may be little doubt over what is intended, “will have improved levels of deprivation” could mean either more or less - but more worryingly again the language is overly technocratic. Please make a reference to the elements of deprivation that are hoped to be improved. For example: “People will be healthier,

have opportunities for learning and work, will live sustainable lifestyles, will feel safe and suffer from less crime, communities free from discrimination, fairer”, etc.

The reference to “Building Schools for the Future” will mean little beyond the Town Hall. Further, as part of a strategic vision the name of the programme (the BSF) is of no relevance. What is important is that there is a programme that has the potential to transform secondary schools in Lewisham. Simply stick to “All secondary schools will have been rebuilt or refurbished. Put simply, our schools will be far better places for our young people to learn.”

Question 9

Further comments

Are there any other considerations that need to be included in the vision?

Yes:

- the ability for Lewisham residents to take pride in what happens to their waste by promoting the need for a proper comprehensive waste strategy based on high levels of recycling and waste reduction
- the potential to transform our housing stock into energy efficient homes reducing fuel poverty, tackling climate change
- transformation of our streets by a very simple 15 year programme of street trees, replacement and maintenance
- food growing in our parks and open spaces
- a “Green Schools Programme”
- improve the quality of parks and open spaces, stations and proper people-friendly street design to make people feel safer
- removal of street clutter across the borough, tidying up our streets instantly
- a “Green Business Park”
- scope for creation of new public spaces at the suggestion of local people, such as the pedestrianisation of Coulgate Street for community activities, markets and similar

Crime and community safety and community cohesion are vital contributors to Lewisham’s success, yet they are not mentioned beyond opaque references to ‘deprivation’.

Question 10

Core Strategy Objectives

Do you feel the strategic objectives proposed for the draft Core Strategy cover all the relevant issues?

No.

Core Strategic Objective 1 : Facilitate development

The broad thrust of regeneration of the borough is supported. However there are serious concerns that such schemes as are planned place too much reliance on private sector funding. Convoys Wharf stands out an example of the problems inherent in this approach, further Lewisham Gateway and other proposed developments in and around Lewisham town centre are a case in point. Additionally this approach can lead to boring estates of houses rather than places where people live and have their homes.

Therefore one of the strategic choices that needs to be introduced is the risk that such plans will not be delivered – and how to address this within the proposals being considered. Put simply between the ‘high growth’ and ‘moderate growth’ model there are a range of intermediate options which will carry different levels of risk. Also the objective needs to place at its heart to create viable, sustainable, and cohesive communities. This favours a co-operative and collaborative approach with emphasis on a large number of smaller developments leading to wholesale transformation with diverse range of neighbourhoods, new districts and quarters.

So this Core Strategic Objective might be rephrased as:

Use a variety of redevelopment opportunities where co-operation between local people, Lewisham’s partners, social housing providers, the NHS and other public bodies steers the delivery of new homes, particularly in Lewisham, Catford, Deptford and New Cross. An aim of this will be to secure substantial physical and environmental regeneration of the borough and socio-economic benefits for the wider community within the lifetime of this document and within the expectations of local people. Some benefits will be borough-wide but they should be focused on areas where deprivation is concentrated, such as New Cross, Evelyn, Lewisham, Downham and Bellingham. Individual developments will be limited in size so as to ensure that smaller groups, co-operatives and others can participate fully in the regeneration of these areas.

Growing the local economy

It is important to distinguish within this the need to encourage Lewisham’s economy from a relatively low base (recalling that many of our citizens are reliant on jobs in the public sector) from simply encouraging ‘growth for growth’s sake’ based on over-consumption of dwindling resources. For instance, reliance on a massive expansion of retail opportunities to deliver jobs for some local people will do nothing to address over-consumption and will in fact encourage unsustainable levels of consumption. It is important therefore to offer some guidance in this strategic overview as to the types of economic activity we want to encourage.

Securing a site for a ‘Green Business Park’ making use emerging green technologies as an opportunity to provide high quality jobs for local people; training opportunities for local people in trades needed to support initiatives for new development and works on older properties.

Question 11

Strategic objectives expression

Do you feel the strategic objectives are expressed clearly?

Previous comments about language apply.

Question 12

Further comments

Are there other strategic objectives that could be included to deliver the vision?

Much of the existing housing stock in Lewisham is poor in terms of its energy rating. Regeneration of the borough needs to consider how we can find the investment needed for existing homes, not just new homes. The LDA's London-wide insulation scheme is an example of how such things can be done.

A new objective:

Greening our homes

Facilitate investment in our existing homes, to increase energy efficiency and support the introduction of new renewable sources of power.

A new objective:

Many residents are concerned about the so-called 'look and feel' of the Borough which varies greatly from the relatively 'leafy sections' of Brockley, the more fashionable area of Blackheath Village and those areas that are in need of additional development. Added to this the prevalence of unnecessary street clutter, grey streets and the need for new public spaces close to where people live:

Greening Our Neighbourhoods

Enhance Lewisham's urban environment by taking action to reduce on-street clutter; make good use of street trees and other plants and landscaping to bring about a transformation of many of our streets into visually pleasing green corridors. Encourage and support pedestrianisation schemes brought forward by local residents where these clearly add good quality public space.

A new objective:

Ward boundaries do not follow natural communities – many people describe their local area by the name of the station that they use to get about. In terms of building stronger local communities and identities there is a good role for providing stronger ways in which local people can identify with their own areas. The model presented by Blackheath Village is useful in this.

The Villages and Communities of Lewisham

Based on existing District and Local Hubs introduce area development plans in consultation with local people to bring about a transformation into thriving hubs of economic activity, an interesting night-time economy involving protection for local pubs, restaurants, local theatres and similar, a good range of local shops and services, new high quality open spaces for use by the community for leisure, markets and other activities. New villages and communities will be supported within the newly regenerated areas of Lewisham where these do not exist already.

Question 13

Strategic Spatial Option 1 : Borough-wide regeneration and growth

Broadly more favourable to Option 2; the more limited approach. However in order for it to be successful there are a number of changes that need to be undertaken:

- A Green Business Park – much like Dagenham Dock. One of the areas of Strategic Employment Land identified in the options should be designated as a ‘green business park’
- ‘Affordable Business Premises’ – providing practical and direct support for new businesses.
- Green Housing Estates – MEL created from SILs will be zero-carbon
- Support for the resistance of development on open space and the aim of a net gain across the borough; however would prefer to see net gains in areas most short of open space
- Higher densities around transport hubs are a sensible and proper restraint for car parking and we support these
- We support high quality design and the incorporation of renewables and sustainable design and construction measures to improve energy efficiency measures.
- Within the lifetime of this document, zero-carbon homes will be a requirement. Housing on the SILs transferred to MEL will need to meet this requirement straightaway.
- Comments on the over-development of Lewisham Town Centre below

Points Common to Options 1 and 2:

Lewisham Town Centre

The over-reliance on the development of Lewisham town centre as it currently is to create a ‘Metropolitan Town Centre with over 100,000 sq m’ of floor space is in danger of creating an imbalanced economy in Lewisham. Shopping parades, smaller town centres and districts are struggling. The viability of many is brought into question by easy conversion to other uses – A2 use (including betting shops and perhaps less so now, estate agents) and take away fast food places. There is scope for making better use of the existing Lewisham shopping provision and for enhancing the market and strengthening its position in Lewisham’s retail hierarchy. A new town centre for instance, could incorporate an extension of the existing market rivalling further other markets in London such as Walthamstow and offering simple ways in which Lewisham’s diverse communities can link with others. Alternatively options for a ‘covered market’ could be a good addition to the current retail space in Lewisham. Attractive as it might seem to provide ‘top of the range shops’ perhaps seen to be rivalling Bluewater and the West End, unless this is allied to a wholesale increase in the spending power of local people it will risk becoming a white elephant or simply provide nothing for the majority of local people. Striving to create a ‘destination shopping centre’ as a priority risks being a huge misinvestment of precious resources, sending Lewisham in a direction that would soon be proven unsustainable as climate change and oil depletion demand a relocalisation of the economy in which people are able to shop for most needs in their immediate neighbourhoods.

The road network must create space for cyclists.

Additionally any redevelopment of the town centre must improve air quality for existing and future residents.

Catford

Catford Town Centre is in need of significant regeneration; the close by Milford Towers too. Proposals to realign the South Circular must not simply create additional road space and encourage more traffic.

Deptford

The proposals for Deptford Town Centre and the new squares are supported. Major new retail development should be resisted if it impacts negatively on the market and the exciting and vibrant mix of independent and local shops on the current high street.

Activity Hubs

Provision of new public spaces to cement community activities and provide coherence need to be considered. Such spaces could be used to enhance the retail activity by providing scope for street markets.

Local Hubs

The redesignation of employment sites needs to be carefully considered. In the case of Brockley Cross for instance it is important that a much improved public realm is developed should these uses be offered up. Additional space at Bell Green should be for 'affordable business premises'.

Areas of Stability and Managed Change

A thorough review of the impact of backland development on neighbouring homes and premises and the quality of such homes is needed. Anecdotally much of the developments can be poor. In-fill developments conversely can improve areas by removing unsightly vacant plots.

There needs to be active support and investment in neighbourhood and local shopping centres and parades beyond simple retention and protection (para 6.67)

Question 14

Strategic Spatial Option 1 expression

Again some technical jargon, however as this part of the document is detailed it is relevant.

Question 15

Other ways

Lewisham's officers have a range of resources to research and answer this question given the range of policy options available to them within the constraints set – in particular the need to meet national and regional government requirements.

The current document places heavy reliance on providing the money/resources from the private sector by releasing land. Alternative ways of bringing local people, communities, housing associations and Lewisham providing financing itself (by using its own good credit rating to get good long term loans) are all options worthy of being explored. The changes proposed within this document will shape Lewisham's future for generations and as such Lewisham should be entitled to finance improvements by way of long term bonds without racking up expensive interest payments for generations to come. The alternative is reliance on private sector finance, which can be unreliable in times of economic recession and whose value to the community can be undermined by the need to make a profit at the expense of sound development for local people. Additionally there needs to continue to be a robust way of checking that land valuations and profit calculations in schemes that are reliant on Lewisham changing the designation of these important strategic industrial land uses must meet the most exacting standards with a truly 'open book' approach if our requirements are claimed by developers to be not financially viable.

In those schemes involving the public sector, a presumption of moving away from PFI schemes could be in place as these schemes will in all likelihood prove expensive over the lifetime of this document than more traditional forms of financing.

Question 18

Other ways

See Q15 above

Question 21

Infrastructure

Do you feel infrastructure requirements have been adequately considered?

Physical

It is not clear how the Lewisham Gateway proposal will contribute to a 'network of well connected and accessible...cycling routes...'. Explicit reference to the need to identify safe and modern cycling routes around the 'h' scheme needs to be built into the scheme.

Within the documents it is stated "The Council will actively lobby for...". This section needs to be extended to include the following that the council will lobby for:

- the reopening of the high level station at Brockley – specifically in response to increased use of this station by soon to open East London Line
- continuation of services directly to London Bridge and Charing Cross after the opening of the East London Line
- the extension of platforms at stations throughout Lewisham and beyond to allow for significant increase in capacity

Social

Schools – the guiding principle has to be whether the number of places being provided is sufficient to reduce the need for children and parents to travel across the borough. All children have the right to a good local school, democratically accountable to the local authority.

Health - We support the introduction of polyclinics where they complement existing GP services rather than replace them and ensure they are publicly not privately run. In planning terms we would expect there to be a proper appraisal of this when change of use for existing GP premises is considered or sites for new polyclinics proposed.

The future role of Lewisham Hospital in providing a key service for local people needs to be captured in this strategic vision. If the population is to increase then it is even more vital that a full range of medical, clinical and surgical specialities is retained at Lewisham in addition to Accident and Emergency.

There is no mention of the physical needs of other important services should the development of Lewisham take place at the level suggested – Police, Fire, Ambulance who are all part of the Lewisham Strategic Partnership.

Green

Change “Sites that already have a clear potential to achieve Nature Conservation Importance would be afforded a level of protection according to their status, potential status and species or potential species”

It is clear that a number a number of sites in Lewisham, particularly back land sites are considered by many local people to be of importance for nature conservation purposes. However, as many of the sites have not been managed as such for many years their potential has not been realised. Therefore in attempting to assess these, advice would be sought from a relevant professional to determine if there is a reasonable prospect of such a site achieving a significant status and this will be considered along with other evidence.

With regard to cycling routes – Lewisham needs to consider making a compulsory purchase of the land available to implement the cycle and walking routes prior to development taking place. The council needs to make sure proper provision for cyclists wishing to cycle through Lewisham Town centre in the event that the low ‘H’ arrangement is implemented without the need to dismount at junctions or share space with motorised traffic.

It is disappointing that the cycle networks and walking routes have not been included in figure 6.7.

Question 22

Homes for all options

Do you support the possible options for inclusion in the draft Core Strategy?

Option 3 – Housing Provision

Broadly support the proposals – however believe that overall housing provision should be higher than targets in London plan, but not as high as that provided for in the ‘high growth model’

Option 4

Strongly agree that 50% should be adopted as the level of affordable housing within the borough. Consider that in addition to the financial viability, for proposals that fail to meet the 50%, the applicants should be expected to do so on an ‘open book’ basis with these financial viability studies being publicly available.

Support for ‘100% affordable housing schemes’ needs to be qualified. Large new estates made up totally of affordable housing could be seen to risk repeating some of the mistakes of the past; conversely introducing 100% schemes into areas with little current affordable provision could be a positive way of creating more balanced communities.

Option 5 – Affordable housing threshold

Agree with this proposal – in particular the opposition for ‘cash in lieu’ payment.

Option 6 – Housing Mix

Table 7.2 shows that there is a clear need for a more detailed assessment between the options 1 & 2 proposed. There is scope for adopting both measures in different areas of the borough to more properly match the potential future residents to services within the area and likely demands. Thus for development in the major town centres of Lewisham & Catford, Option 1 might be more appropriate; development outside of these Option 2 more so.

In addition to the criteria:

- the likely impact on the environment – whether this be by use of materials, carbon dioxide production through use of the site, the potential for renewable energy etc

Option 7 – Lifetime homes
Support

Option 8 – Accessible housing
Support. In addition it is worth exploring options to ensure that reasonable adaptations to homes can be supported if they clearly add to the ability of the persons to stay in their homes.

Option 9 – Gypsies and travellers
The Council needs to set a date by which this site will have been determined and implemented. As it stands Lewisham is in the disgraceful position of having no provision for a community that has traditionally been the subject of racism and discrimination.

Question 23

Homes for all issues

Are there any other issues that need consideration?

Yes –

Fuel Poverty - the homes need to be proofed against future fuel poverty by adopting the highest possible standards of insulation, renewable energy, double glazing and seeking ways of keeping homes cool in summer passively without the need for additional energy. There is little point in building affordable homes that are literally too expensive to live in.

Storage Space – smaller homes resulting from higher density means that there is an increasing need to provide storage space. Many of the older estates had ‘pram sheds’ – a similar concept could be adopted on new estates/developments particularly of use for cyclists and families with children.

Food growing – climate change means we should be encouraging local food growing to cut food miles and cut CO2 emissions from transporting it; oil depletion means we must encourage local food growing in order to address our low food security. The Core Strategy should name this as a land use priority and the LDF as a whole should contain policies which provide land for allotments, kitchen garden space and community food growing for estates.

Question 26

Employment land options

Do you support the possible options for inclusion in the draft Core Strategy?

Option 13 – School provision on this site could be mentioned here, given that schools are a source of local employment. The promised green business park, if located in the north of the borough with river access, could import raw waste materials from other boroughs and export end products by water. Similarly, there could be employment provided by encouraging floating businesses such as cafes.

Option 14 - With respect to LEL 4 Creekside and MEL 21 - Sun & Kent Wharf the outcomes of the Creekside Charrette should be taken into account and Boater community respected. Live-Work developments can include the boating community on Creekside.

Question 27

Employment land issues

Are there any additional issues that need consideration?

The importance of new and emerging 'Green industries' has not been recognised. The need to develop a wharf and/or suitable railhead to facilitate more environmentally friendly transportation of construction materials/waste.

Question 28

Employment land options and alternatives

Is there another feasible option or options having regard to the alternatives?

The proposal to designate one or more of the 'Strategic Employment Locations' to be given up in Option 2 as a 'Green Business Park' like Dagenham Dock, or to provide 'Affordable Business Premises' rather like some schemes brought forward to planning in recent months.

Brookmill Park's surfeit of willow could be put to employment use by turning it into a biomass harvesting opportunity. Send arisings to Creekside Centre, store and dry there (or at another suitable site). This is a sustainable enviro-industry with sustainable jobs arising. Local developments such as Loampit Vale are likely to have wood pellet boilers, providing a local market for this industry.

Question 29

Further comments

Are there any other comments relating to employment land?

7.141 – where these businesses add to the variability and viability of the local economy the release of these sites should be resisted.

Question 30

Retail and town centre options

Do you support the possible options for inclusion in the draft Core Strategy?

No

Option 15 – "The Retail Hierarchy" is correct in providing an analysis of the relative size of the various options but totally inadequate in terms of delivering support for smaller independent shops and the local economy versus the corporate chain-dominated and well-funded sector of the major retailers.

We would propose an alternative "Retail Pyramid":

Parades at its base; neighbourhood local centres, district centres, major town centres and leaving the 'out of town centre' to one side as a particular case.

In this scenario the majority of support and development is aimed at the local parades, neighbourhood local centres, and district centres, with a smaller level of support going to the major town centres.

Option 17 – The approved plans for the Lewisham Gateway shows that ‘Metropolitan Status’ is incompatible with the needs of improved air quality, provision of affordable homes and good cycling facilities in Lewisham Town Centre and therefore should be dropped. The same plans show also that the economic benefits in terms of jobs for local people are relatively small – something like 7 or 8 jobs in each of the wards covering or bordering the development. There are other good reasons to reject this over-reliance on consumption and consumerism in the face of climate change, but this is probably not the place to address this.

Option 21 - Local shopping facilities need to be afforded the highest level of protection and support to ensure that they flourish for the future. Elsewhere, the Core Strategy describes how £250M is expected to be invested in Lewisham Town Centre, yet this section describes how the “use and contraction of the [local] shopping facilities will be considered if evidence is established that there is no economic prospect of such uses continuing”. This permits structural changes to the local economy (ie wiping out parades of shops) in response to what may be a cyclical effect in the local economy (such as the current recession). Such changes of use are frequently unpopular and remove local jobs. Additionally changes of use are frequently to what may be more profitable - hot food takeaways which are unpopular with many and can discourage the consumption of a healthy diet.

This should be rejected. Option 18 has a useful proposal:

“Issues relating to the vitality and viability will also be addressed through town centre management strategies and the action of the town centre managers” – simply extend their remit to cover local parades and neighbourhood centres far more strongly. Additionally local groups such as ‘Ladywell Village Improvement Group’, ‘Brockley Cross Action Group, ‘Friends and Users of Staplehurst Shops (FUSS)’ demonstrate clear public support for such action.

The aspiration should be for every parade to be a ‘Nunhead’ – hosting a baker, butcher, fishmonger, grocer, florists and post office. No-one should be further than a short distance away from a good range of local services on an easily accessible walking and or cycling route (in other words no large hills, difficult and dark alleys or bridges that deter people from walking).

Question 31

Retail and town centre issues

Are there any additional issues that need consideration?

The impact of the development of town centres on the viability and vitality of the local shopping parades/neighbourhoods/district town centres. The studies propose that there is scope for additional retail in Lewisham – but does not consider how this could be directed towards local shops and districts.

The importance of our street markets in delivering fresh food at keen prices to our residents – Deptford Market, Lewisham Market. Whether a covered market could be

created to improve the trading conditions for local producers enabling a wider series of non-perishable goods to be sold and stored on site offering more retail opportunities for local people. An example of this worth investigation by officers is in Norwich's main city square.

The diversity of our town centres/districts – whether they are dominated by chain stores offering a standard selection of national goods and taking profits out of the local area – an example might be in fact comparable shopping districts that have achieved 'Metropolitan Status'; or whether we seek to have thriving districts such as Deptford High Street with hosts of locally owned shops serving the diverse communities of that area.

Support for Farmers' Markets or other smaller markets elsewhere in the borough that could particularly support local shops.

Whether the proliferation of hot food takeaways, particularly in the vicinity of schools, can be properly controlled by adopting proposals such as those in Waltham Forest.

What support can be offered to pubs to prevent unpopular conversion to other uses and support for suitable night time economy.

The number of betting shops that Lewisham has – it is one of the highest in London yet this leisure activity can cause serious harm through problem gambling. Importantly the harmful effects fall disproportionately on the lower paid, their families and vulnerable people. The widespread incursion of betting shops into our parades offers a view to young people that gambling is a socially useful activity.

An alternative is to set a maximum size on each of the units so that no single shop can dominate.

In new developments incorporating mixed use, it is essential that no one shop is so large that it effectively dominates as appears to have happened in the redeveloped Hither Green Hospital site. For this reason, it will be a requirement that no one shop will occupy more than 50% of the available floor space where 3 or more shops are proposed.

Question 32

Retail and town centre options and alternatives

Is there another feasible option or options having regard to the alternatives

The 'Retail Pyramid' as noted above; diversity criteria for new retail and existing areas such as Deptford High Street; support for street markets and farmers' markets including an improved covered market; protection of change of use from A1 to A2 or other on parades.

Ravensbourne Retail Park is an ideal opportunity to encourage an environmental/retail park with the adjacent Ravensbourne river broken out to meander through a widened profiled channel with bridges to the units and catering facilities taking advantage of views. The Environment Agency would encourage a scheme as part of general flood alleviation. Living Roofs (with rainwater capture) on the warehouse roofs incorporating renewables (hot water solar panels mainly) and SUDS would improve the sustainability.

Question 40

Waterways and Flooding options

Do you support the possible options for inclusion in the draft Core Strategy?

Broadly yes. The Green Group supports SUDS, living roofs and walls and rainwater harvesting being expected as standard in developments (ie the norm not the exception as is still all too often the case now).

Question 41

Waterways and flooding issues

Are there any additional issues that need consideration?

Yes. Whenever any development near one of our waterways is proposed, the opportunity should be taken to improve the area. Eg a development alongside part of the Quaggy/Ravensbourne that is in a concrete channel should look at how that section of the river could be naturalised. If it is not feasible to modify that section of the river in isolation, then S106 money should be put in a pot towards a larger scheme for that purpose.

There should be a presumption against developments going right up to the river and in favour of public access to the river bank, with pedestrian and cycle paths being provided. This is particularly important in respect of the stretch of the Thames that is in the borough: the opportunity should not be lost to complete that section of the Thames path with any future developments. We support the work that is being carried out in Ladywell Fields and elsewhere to renaturalise riverbanks and reinstate natural floodplains.

The Green Group believes that we should also be making better use of the potential of the River Thames as a means of transporting goods to and from the borough and should ensure we have a working port/dock within our limited Thames frontage.

We should not overlook smaller, less well-known waterways in the borough, and the flood risk they pose. An example is the Chudleigh Brook/Ditch which within the last year flooded and caused damage to properties in Slagrove Place, as a result of poor maintenance and blocked drainage. There is a lack of clarity over who is responsible for the maintenance of such minor waterways, which needs to be addressed, and there needs to be improved communication between the EA and the Council regarding this.

The Waterlink Way is an important cycle and pedestrian route running from Bellingham in the south of the borough to Deptford in the north. There are currently 'missing links' in this route, which make it difficult for cyclists to make the whole journey on safe, quiet routes. Any developments in these areas should be used as an opportunity to complete these missing links, eg the problem with the bridge on Ladywell Road and access from Ladywell Fields via Wearside etc.

Question 43

Further comments

Are there any further comments relating to flooding?

The Green Group is concerned that as ice caps are melting faster than previously expected and the latest scientific research suggests that climate change is happening faster than predicted, sea levels will rise faster than anticipated, and

consequently the Thames Barrier may not be able to cope for as long as currently envisaged. This places a much higher risk of flooding in the north of the borough.

Question 45

Open space and biodiversity options

Do you support the possible options for inclusion in the draft Core Strategy?

Broadly, yes.

Question 46

Open space and biodiversity options

Are there additional issues that need consideration?

Dwindling oil supplies and the need to reduce our carbon emissions mean that we need to reduce our dependence on food that has been transported a long distance and to increase the amount of food grown locally. This has the advantage of improving the health of local people as well as increasing the future resilience of the borough to the impacts of climate change and fuel shortages.

Therefore, as well as the need for open space for exercise and recreation, due attention also needs to be given to space for growing food and to address the lengthy waiting lists for allotments in the borough. Larger new housing developments should include provisions for community gardens for growing food and provision for extra allotments also needs to be considered in large scale developments. Scope for community gardens for food growing also needs to be looked at within existing parks and open spaces.

We also need to look at what imaginative use can be made of roof space and balconies in developments to increase green space and food-growing capacity.

When considering open space, we need to differentiate between the mostly hard landscaped public space proposed for the Lewisham Town Centre regeneration and more wild, green spaces. There is a need for both and we shouldn't forget to allow for more natural, wild spaces in new developments, as well as more formal open spaces. When granting planning for future green spaces, consideration needs to be given to the nature of planting proposed and its likely required water consumption.

We should also look at the potential for making greater use of our streets as play areas and green spaces. In particular where park space is limited, more trees along streets and more living street type schemes could help to transform some of our streets from car-dominated areas uninviting to cyclists and pedestrians and with poor air quality to much more people-centred places.

When creating new open spaces and improving existing ones, accessibility for all residents, including those with disabilities, needs to be taken into account.

Question 50

Waste Management options

Do you support the possible options for inclusion in the draft Core Strategy?

No. We support the waste hierarchy of prevention, reuse, recycle, but do not support the current emphasis on incineration of waste.

Question 51

Waste Management issues

Are there any additional issues that need consideration?

Given the urgency of reducing our carbon emissions to reduce climate change, and the poor air quality in many parts of the borough, much greater emphasis needs to be placed on reducing the transport of waste. We would therefore propose that more attention is paid to dealing with waste closer to its source. There is a need for a waste transfer site in the south of the borough. Any new development, whether one unit or a large block of flats needs to include provision for the composting the organic waste produced on site. We also need to look at provision of composting facilities on existing estates.

In addition, the green business park we proposed earlier should include provision for reprocessing some of the recyclate produced in the borough, creating jobs and avoiding it being transported long distance out of the borough.

Greater provision should be made in new developments to allow different materials to be collected separately for recycling, which would increase the quality of recyclate, rather than the current co-mingled system.

As well as sites for dealing with recycling and residual waste, we need to allow provision for repair workshops to reduce the amount of goods (eg electrical goods) that are thrown out in the first place) and reuse centres/swap shops to allow residents to reuse items.

Question 55

Sustainable Movement options

Do you support the possible options for inclusion in the draft Core Strategy?

Broadly, yes, though we have concerns over how they will be implemented. We also think that there needs to be much greater emphasis on reducing the need to travel, by provision of more facilities locally, such as thriving local shopping parades.

Question 56

Sustainable Movement issues

Are there any additional issues that need consideration?

In order to improve air quality, reduce road traffic incidents, lower carbon emissions, and prepare for a future where oil supply is limited, we need to have at the heart of our transport policies the aim of reducing the need to travel. Key to this is the provision of thriving local shopping parades to allow people to shop locally rather than have to trek to the nearest supermarket. Such parades are also more inclusive for the sizeable percentage of residents without access to private transport or with limited mobility.

Far too much space is currently given over in the borough to accommodating cars. In a densely-populated borough with a lack of open space and parks this is land we can ill-afford to waste. We should have an explicit aim both to reduce the number of journeys taken in the borough by cars but also the space taken up in providing parking space for them. We can do this through improving public transport and

walking and cycling facilities and encouraging people to use a car club rather than own their own vehicle.

We should be aiming to reclaim some of the concreted over space currently used as car parks for community use, eg food growing, parks. Let's set ourselves a target of reducing the need for one of our car parks in Catford and one in Lewisham Town Centre, and turning that into an attractive public space.

We need explicit mention in our planning policy of the role of car clubs and incorporating on street parking spaces for these, as well as cycle parking.

Greater use of CPZs would allow greater control over whether developments are able to be car free or not. We fully support car-free developments in areas with high PTAL rating.

Space for cycle hire hubs (in anticipation of the proposed central London scheme being extended) needs to be incorporated into major developments and transport infrastructure projects, eg the redevelopment of train stations.

We support the capacity improvements on mainline rail services. We think the borough should include within this planning framework its support for the proposal to extend the Bakerloo line down to Lewisham and then on to Hayes line as well as the re-opening of the Brockley High Level station.

Freight: We support the proposed role for the River Thames as a freight transport corridor, but think that greater use should be made of the rail network too for this purpose, rather than the road network. The Thames River should also be considered as a transport option for people, as well as freight.

We urgently need to close the missing links on the Waterlink Way and route 21, so that these can truly be exemplar green lane cycle routes. Compulsory purchase should be considered to achieve this, if necessary, in the same way it would be if it was for a road! We should be aiming for much greater use of these routes over coming years.

We wholly support more Living Streets/Streets for People type schemes such as those proposed for Kender Triangle and Sydenham High Street. Likewise we support the recently agreed policy to remove guardrail where possible to make streets more people friendly. We believe that greater emphasis needs to be placed on the importance of greenery and trees on streets to encourage people to walk and cycle more, and the evidence shows that cars are driven more slowly in such streets.

The Green Group has grave concerns that the existing proposals for Lewisham Town Centre redevelopment fail to provide acceptable provision for cyclists. It should be recognised that for some their bicycles are a mobility aid and as such they should be given access to pedestrian areas in the same way that wheelchair users are.

Question 60

Promoting good design options

Do you support the possible options for inclusion in the draft Core Strategy?

The Green Group supports the Council's aim of striving for good design in new buildings, and to preserve Lewisham's historic heritage. We support the policy of high density developments near public transport hubs. We agree that consideration

should be given to the impact tall buildings could have on nearby waterways and open spaces, in terms of overshadowing and creating wind turbulence.

Question 61

Promoting good design issues

Are there any additional issues that need consideration?

Yes. Good design should also be sustainable design, which takes into account the materials used, the positioning of the building to maximise solar gain, good natural light and ventilation to minimise energy requirements and good water management (living roofs to reduce water run off, rainwater harvester, grey water recycling).. Cement accounts for a significant percentage of global carbon emissions and we need to look at ways of reducing this. Active street fronts make a place feel safer and more of a community, whereas gated developments have a tendency to divide and isolate communities.

Listed building on the at risk list. We are concerned at the number of listed buildings in the borough that are in a poor state of repairs, including Ladywell Playtower and Beckenham Place Mansion.

Question 65

Community Services options

Do you support the possible options for inclusion in the draft Core Strategy?

We broadly support options 42-44. We support the policy of providing facilities within communities to reduce the need to travel.

We support the aims of opening up schools to community use outside school hours, but note that we are still waiting for this to happen in the case of several recently built schools.

Question 66

Community Services issues

Are there any additional issues that need consideration?

Yes. There is a shortage of meeting places and youth provision in parts of the borough (eg Ladywell).

There is currently a shortage in swimming provision in the borough, until a replacement for Forest Hill Pool is built.

We are concerned that there will be a shortage of primary school places in central Lewisham as a result of the new housing planned as well as the reduction in primary school places at Lewisham Bridge and feel provision for further primary places needs to be made.

We note that post offices and police stations are an important community facility and that it is important to keep these within communities too.

Question 70

Planning obligations and CIL options

Do you support the possible options for inclusion in the draft Core Strategy?

We remain unconvinced either way on this and await further details on CIL. We would support any policy that made the planning obligations system more transparent and support the concept of developers paying towards infrastructure costs incurred as a result of their scheme. However, we wouldn't want to lose the flexibility of S106 to collect funds for smaller local improvements as well as bigger strategic items.