



Planning Service
London Borough of Lewisham
Laurence House, 1 Catford Road
London SE6 4RU

By email to: localplan@lewisham.gov.uk

20 April 2023

Dear Sir/Madam,

Lewisham Local Plan – Regulation 19 Consultation.

CPRE London is a membership-based charity with 2,500 members across London, concerned with the preservation and enhancement of London's vital green spaces, as well as the improvement of London's environment for the health and wellbeing of all Londoners.

Policy GR2 Open space – lack of clarity in green space deficiency and how it will be tackled: policy must be revised to emphasise provision of green space *per person* so there is genuinely 'no net loss'

1. **Green space *per person*.** This policy seeks to protect the total amount of green space, however with increasingly high-density development, there is a likely risk of net loss of green space *per person*. This policy should be revised to reflect provision (and deficiency) in terms of the amount and type of green space available per person and appropriate policies introduced to tackle the growing issue.
2. **Streetparks / Garden Streets.** To support the borough's growing population the council should set out specific, clear proposals to create small parks from grey space including converting whole streets or sections of streets to create 'streetparks' (like [Alfred Place](#) in Camden).
3. **Grass sport pitches.** Lewisham has fewer sports pitches than most boroughs and no major sports pitch hubs and major densification of Lewisham town centre means, *per person*, provision will have been substantially eroded. This deficiency should be clear in the Plan and policies should be put in place to address it. In common with other local authorities, the council should adopt the Six Acre Standard.
4. **Site Allocations** Some Site Allocations incorporate proposals to build on green space: these should be deleted or revised to state that all amenity green space will be retained due to the acute shortage in the borough. Please [see our specific comments on the Site Allocations below](#).
5. We support the increase in Metropolitan Open Land (MOL from 10% to 12%. We support all new MOL designations (as per 'Proposed changes to the adopted Policies Map') and new SINC designations.

Proposed MOL de-designations

6. We agree that the three MOL parcels around Lewisham Gateway should be de-designated, however, the remaining **parcel of land to the south of Glass Mill Leisure Centre should be retained as MOL** as this is now the only green space in this highly built-up area.
7. **Reduce the four-lane carriageway rather than removing green space at Jubilees.** We do not support de-designation of the section of MOL at northern tip of Jubilees Ground, St Dunstan's to accommodate road crossings. Space can and should be created for safe pedestrian crossing points / cycle lanes by reducing the size of the existing four lane carriageway.



Use the Local Plan process to give local parks Local Green Space protection

8. The Local Plan should designate all key public parks and open spaces in Lewisham, which are not currently protected by MOL status, as Local Green Space to ensure they are protected into the future. We cannot see any proposals for designation smaller green sites as Local Green Space and believe this should be an important inclusion in the final version of the plan.

New public parks for Lewisham

9. Two sites should be designated as local parks and given protected MOL or Local Green Belt status.
- Gorne Wood: The Fourth Reserve Foundation the closest site of designated Ancient Woodland to the City of London and should become a park.
 - The Railway Children Park: This series of green spaces in Grove Park with importance for nature conservation, with heritage and nature value, and its importance as a local park

Housing estates, infill development and reconfiguring car-parking parking provision on estates

10. The Local Plan should include a policy for housing estate green spaces, stating that 'infill' schemes will ensure residents do not lose green space *per person*; building on estate green spaces will be resisted; if green space is lost it will be replaced and preferably enlarged; and that 'grey space' (parking / roads) on estates will be rationalised into specific locations allowing more to be converted to green space. We are very concerned about the council's plans to remove green space on Dacres Road estate which is vital for residents' physical and mental health and is an important haven for wildlife. We also understand 30% of green space on the Valentines Court estate will be lost to development and Mais House estate will lose 19 mature trees and a much loved communal green.

Kerbside space

11. **A policy should be included on reallocation of kerbside space:** We estimate that, in land use terms, a significant amount of land in Lewisham is kerbside space, most of which is likely to be 'rented' cheaply for private car parking.
- The Local Plan should propose re-allocation of land-use for at least 25% of kerbside space in Lewisham – referencing environmental and social goals and establishing an appropriate target for reinstating kerbside as a public space, to be used for everything from bus and cycle lanes, safe cycle storage, shared mobility parking, delivery hubs, rain gardens, tree planting on build-outs, EV charging points on build-outs, parklets, pocket parks, play on the way features/play trails, and whole streetparks (e.g. Lambeth [Kerbside Strategy](#)).
 - Additionally, there should be a policy for main roads to be a maximum of one lane in either direction for general traffic (including main roads) with other space repurposed for sustainable uses.

Tall buildings

12. Housing should be limited in height and 'humanscale' – eight storeys maximum – to halt a worrying move to super high density without adequate access to open and green space.



13. Specific site allocation comments

Lewisham's Central Area:

- Site Allocation 10 – House on the Hill at Slaithwaite Road: Mature Trees and green space should be retained.
- Site Allocation 12 – Ladywell Play Tower: Green space and mature trees around the site should be retained.
- Site Allocation 20 – South Circular: We do not support the de-designation of MOL (see earlier).

Lewisham's North Area:

- Site Allocation 9 – Surrey Canal Triangle: Green Space and mature trees alongside the railway line should be retained as these provide important habitat for wildlife.
- Site Allocation 15 – Albany Theatre: There is a large amount of green space on site and mature trees. This should not be built on.
- Site Allocation 16 – Land North of Reginald Road and South of Frankham Street: open green space and mature trees on site should be retained.

Lewisham's East Area:

- Site Allocation 1 – Heathside and Lethbridge Estate: trees and green space to the east of the site should not be built on.
- Site Allocation 7 – Mayfields Hostel, Burnth Ash Hill: The green space and trees should be retained.

Lewisham's South Area:

- Site Allocation 1 – Former Bell Green Gas Holders and Livesey Memorial Hall: This strategic green open space on this site should be retained and the gasworks (or a significant part of it) could be set aside for a large green open space / habitat – connected with neighbouring sites. Ideally the whole site could potentially be transformed into a new public park
- Site Allocation 13 – Excalibur Estate: Trees and green space on site should be retained and ideally increased.

Lewisham's West Area:

- Site Allocation 8 – Featherstone Lodge, Eliot Bank: Mature trees on site should be retained.
- Site Allocation 9 – Willow Way Locally Significant Industrial Site: Mature trees on site should be retained.

Thank you for the opportunity to comment on this important consultation.

Yours sincerely,

John Sadler
Campaigns Officer
CPRE London