

# STRATEGIC PLANNING COMMITTEE

Date of meeting: **THURSDAY 4 OCTOBER 2007** Time: **7:30pm**

Place: **ROOMS 1 & 2, CIVIC SUITE,  
LEWISHAM TOWN HALL, CATFORD SE6 4RU**

Members of the Committee are summoned to attend this meeting:

## **Membership**

### **Councillors:**

**Bentley**

**Downes**

**Klier**

**Long**

**Massey**

**Morris**

**Paschoud**

**Priddey**

**Smith**

**Walton**

(Note: Members of the Committee are reminded to make any declaration of pecuniary interest, or other interests they may have in relation to Items on the agenda, either at the start of the meeting or at any stage during the meeting if it becomes apparent that this may be required).

The public are welcome to attend our committee meetings, however, occasionally, committees may have to consider some business in private. Copies of reports can be made available in additional formats on request.

**Barry Quirk**  
**Chief Executive**  
**Lewisham Town Hall**  
**London SE6 4RU**  
**Date 25 September 2007**

**For further information please contact:**  
**Lesley Humphreys Committee Co-ordinator**  
**5<sup>th</sup> Floor Laurence House**  
**Catford Road SE6 4RU**

**Telephone No. 020 8314 8701**  
**Email: [lesley.humphreys@lewisham.gov.uk](mailto:lesley.humphreys@lewisham.gov.uk)**



Committee	STRATEGIC PLANNING COMMITTEE	Item No. 1
Report Title	ELECTION OF CHAIR	
Ward		
Contributors		
Class	PART 1	Date 4 OCTOBER 2007

To elect the Chair for the meeting.

Committee	STRATEGIC PLANNING COMMITTEE		Item No. 2
Report Title	DECLARATIONS OF INTERESTS		
Class	PART 1	Date	4 OCTOBER 2007

### Declaration of interests

Members are asked to declare any personal interest they have in any item on the agenda.

### Personal interests

There are two types of personal interest :-

- (a) an interest which you must enter in the Register of Members' Interests\*
- (b) an interest where the wellbeing or financial position of you, (or a "relevant person") is likely to be affected by a matter more than it would affect the majority of inhabitants of the ward or electoral division affected by the decision.

\*Full details of registerable interests appear on the Council's website.

("Relevant" person includes you, a member of your family, a close associate, and their employer, a firm in which they are a partner, a company where they are a director, any body in which they have securities with a nominal value of £25,000 and (i) any body of which they are a member, or in a position of general control or management to which they were appointed or nominated by the Council, and (ii) any body exercising functions of a public nature, or directed to charitable purposes or one of whose principal purposes includes the influence of public opinion or policy, including any trade union or political party) where they hold a position of general management or control,

If you have a personal interest you must declare the nature and extent of it before the matter is discussed or as soon as it becomes apparent, except in limited circumstances. Even if the interest is in the Register of Interests, you must declare it in meetings where matters relating to it are under discussion, unless an exemption applies.

### Exemptions to the need to declare personal interest to the meeting

You do not need to declare a personal interest where it arises solely from membership of, or position of control or management on:

- (a) any other body to which you were appointed or nominated by the Council
- (b) any other body exercising functions of a public nature.

In these exceptional cases, unless your interest is also prejudicial, you only need to declare your interest if and when you speak on the matter .

### Sensitive information

If the entry of a personal interest in the Register of Interests would lead to the disclosure of information whose availability for inspection creates or is likely to create a serious risk of violence to you or a person living with you, the interest need not be entered in the Register of Interests, provided the Monitoring Officer accepts that the information is sensitive. Where this is the case, if such an interest arises at a meeting, it must be declared but you need not disclose the sensitive information.

### Prejudicial interests

Your personal interest will also be prejudicial if all of the following conditions are met:

- (a) it does not fall into an exempt category (see below)
- (b) the matter affects either your financial interests or relates to regulatory matters - the determining of any consent, approval, licence, permission or registration
- (c) a member of the public who knows the relevant facts would reasonably think your personal interest so significant that it is likely to prejudice your judgement of the public interest.

**Categories exempt from being prejudicial interest**

- (a) Housing – holding a tenancy or lease with the Council unless the matter relates to your particular tenancy or lease; (subject to arrears exception)
- (b) School meals, school transport and travelling expenses; if you are a parent or guardian of a child in full time education, or a school governor unless the matter relates particularly to the school your child attends or of which you are a governor;
- (c) Statutory sick pay; if you are in receipt
- (d) Allowances, payment or indemnity for members
- (e) Ceremonial honours for members
- (f) Setting Council Tax or precept (subject to arrears exception)

**Effect of having a prejudicial interest**

If your personal interest is also prejudicial, you must not speak on the matter. Subject to the exception below, you must leave the room when it is being discussed and not seek to influence the decision improperly in any way.

**Exception**

The exception to this general rule applies to allow a member to act as a community advocate notwithstanding the existence of a prejudicial interest. It only applies where members of the public also have a right to attend to make representation, give evidence or answer questions about the matter. Where this is the case, the member with a prejudicial interest may also attend the meeting for that purpose. However the member must still declare the prejudicial interest, and must leave the room once they have finished making representations, or when the meeting decides they have finished, if that is earlier. The member cannot vote on the matter, nor remain in the public gallery to observe the vote.

**Prejudicial interests and overview and scrutiny**

In addition, members also have a prejudicial interest in any matter before an Overview and Scrutiny body where the business relates to a decision by the Executive or by a committee or sub committee of the Council if at the time the decision was made the member was on the Executive/Council committee or sub-committee and was present when the decision was taken. In short, members are not allowed to scrutinise decisions to which they were party.

Committee	STRATEGIC PLANNING COMMITTEE	Item No. 3
Report Title	LEWISHAM GATEWAY SE13	
Ward	Lewisham Central/Blackheath	
Contributors	John Miller and Emma Talbot	
Class	PART 1	Date 4 OCTOBER 2007

## **1. INTRODUCTION**

### **1.1 Purpose of this Report**

**1.1.1** A report by the Head of Planning on the planning application for Lewisham Gateway was due to be presented to the Strategic Planning Committee on 6<sup>th</sup> September 2007. At that time, the Environment Agency (EA) had advised the Council informally that it was satisfied that the development would not increase the risk of flooding in the area. However on the day of the meeting the EA advised that it was unable to sign-off details of the hydraulic modelling for the River Ravensbourne and as a consequence the application was withdrawn from the agenda.

**1.1.2** The following report:

- i) sets out progress in discussions with the EA and their formal response on the application;
- ii) sets out comments received from Lewisham's Design Panel following a meeting on 22<sup>nd</sup> August 2006 which were inadvertently omitted from the 6<sup>th</sup> September 2007 report;
- iii) advises on further representations received since the report for the 6<sup>th</sup> September 2007 meeting was finalised;
- iv) advises on a planning application submitted for the River Quaggy east of Lewisham High Street;
- v) sets out the policy context (Appendix A3 of the 6<sup>th</sup> September 2007 report) updated as a result of the Secretary of State's recent direction on saved Lewisham UDP policies.

**1.1.3** Section 2 of this report sets out the recommendations on the determination of the application including amended and additional conditions proposed by the EA and LB Lewisham's Environmental Health department.

**1.1.4** The report prepared for the meeting on 6<sup>th</sup> September is presented in Appendix 2 of this report.

### **1.2 Progress on Discussions with the Environment Agency**

**1.2.1** As indicated above, at the time of the 6<sup>th</sup> September 2007 Strategic Planning Committee the EA had advised the Council informally that it was satisfied that the development would not increase the risk of flooding in the area. This advice was however qualified by the view that there may need to be some minor adjustments to the modelling report and potentially the channel designs to ensure there was no flood risk. Those matters were being looked at by the EA at the time and the EA advised that it was likely to recommend conditions requiring submission of further details and/or amendments to the design of the culvert on the Ravensbourne. As at 6<sup>th</sup> September, however matters had not been satisfactorily resolved with the EA and, in the circumstances, officers considered that further discussions should take place with the EA in an effort to resolve matters before

members considered the application. Accordingly the application was withdrawn from the committee agenda.

**1.2.2** Following withdrawal of the application from the agenda there has been further testing of the hydraulic modelling by the EA. The EA has now written to the Council confirming that the model is robust, there is no increase in the risk of flooding as a consequence of the proposed development and that the submitted drawings are acceptable. The EA has requested certain other conditions relating to such matters as details of planting within the river channels, construction of the surface water drainage system, monitoring of ecological enhancements within the river channel and measures to prevent pollution to groundwater which, where not already covered by conditions prepared by the Council are included in Section 2 of this update report.

**1.2.3** In the circumstances, it is considered that this matter has now been satisfactorily resolved.

### **1.3 Comments of Lewisham Design Panel**

**1.3.1** The application was considered by the Lewisham Design Panel on 22nd August 2006. The following are the comments of the Panel:

- Location considered suitable for high buildings and general massing of buildings thought satisfactory. Differentiation of heights important and if the ultimate volume of development is reduced it's important that the individual building heights change to reflect their particular positions and roles on the site, and do not all end up the same height.
- Approach to the centre from Loampit Vale, facing onto a long row of buses was considered poor, and the panel would have preferred to see the buses concentrated nearer to the station drop off point. General disappointment with the transport interchange and the distance between modes. Need to see clearer details of modal split, whether the capacity can be handled and how the interchange will work.
- Concern about lack of active frontages on west and east sides and on east-west connecting routes, and the sort of intimidating environment they may generate. Conditions of the west side may be made worse by the harsh landscape and lack of planting associated with the bus stops. Orientation and scope for dual aspect shops needs to be carefully considered.
- Proposed mix supported, keen to see large scale public use of buildings at ground/first floor levels.
- Considered important that works to the Quaggy are progressed and integrated with the overall project.
- Parking at 0.5 spaces per unit considered high for the location, creating further traffic in already congested streets. Consideration could be given to lower parking levels and other measures such as a car club.
- It is vital to maintain design quality as the scheme is taken forward. Needs to be locked into agreement.
- Successful connection at southern end into shopping centre and round to town centre is very important. This is currently not apparent and needs to be integrated with future plans by Land Securities.

- Important to maintain a flexible framework to accommodate future changes. Lacks sufficient renewables element at this stage.

**1.3.2** The points raised have been noted and a number have been addressed in discussions with the applicants since submission of the application. In terms of the specific concerns raised by the Panel:

- A differentiation in building heights is specifically addressed on the Parameter Plans and supporting text in the Development Specification document and is secured via conditions and the s.106 agreement.
- The location of the main bus interchange on Molesworth Street and alighting points on Station Road provides for a more efficient arrangement than existing and also allows for passengers to access the mainline train and DLR stations without crossing major roads. It is considered that given the number of bus routes through Lewisham Town Centre the proposed arrangements are acceptable and a major improvement on the existing situation.
- The Design Strategy identifies active frontages to most buildings and this will be refined and developed during the detailed design stage. Whilst the location of bus stops along the Molesworth Street frontage will make this a busy location it is considered that the provision of appropriately dimensioned pavements and canopies on the proposed buildings will improve the street level environment for pedestrians.
- The ground and first floors of the main route through the site and around the new public spaces – Confluence Place and St Stephen’s Square – will be predominately for public uses such as shops, restaurants and leisure.
- Works to the Quaggy to the west of Lewisham High Street including its removal from the existing culverts and deep concrete channel form part of the current application. An application for the Quaggy east of Lewisham High Street has been received by the Council and will be consulted upon shortly.
- Parking provision is at a maximum of 0.5 spaces per unit and the applicants will be required to submit a site-wide and individual building Travel Plan aimed at encouraging non-car modes of transport.
- The applicants are required to submit a Design Framework document prior to commencement of the development to translate the general design quality aspirations into specific proposals and measures and it is also proposed that a Design and Access Panel for the scheme is established.
- Discussions regarding integration of the Gateway scheme with the existing Riverdale Centre are ongoing and form part of the longer term objectives for the town centre.
- Although certain key development parameters are being established through the current application, as an outline application there is flexibility to refine the scheme at the detailed design stage. Further information has been submitted regarding commitments to renewables and sustainability which are considered acceptable and will be secured through conditions and the s.106 agreement.

## **1.4 Further Representations**

**1.4.1** Following completion of the committee report for the Strategic Planning Committee meeting on 6<sup>th</sup> September further representations have been received both in objection to and in support of the proposed development.

In addition to one letter seeking clarification of detailed aspects of the highway modelling these comprise:

- 8 letters of objection relating to:
  - the inadequacy of arrangements for access to public transport, in particular the private car drop-off area for the mainline station proposed on the south side of Loampit Vale
  - the other to concerns that traffic will get worse especially given other planned developments- moving of the rivers and support for QWAG proposals for improving the Quaggy- lowering of air quality- lack of affordable housing- replacement of Metropolitan Open Land with a busy road
  - pedestrian routes and convenience for accessing the station via shopping streets
  - lack of business case for more offices and shops
  - height of the buildings and associated micro-climatic conditions
  - lack of attention to creating a pleasant natural river environment around the Quaggy and Ravensbourne
  - overcrowding on the rail network
  - 'prematurely' of decision pending final adoption of the emerging Area Action Plan for Lewisham Town Centre
- 2 letters raising no objection to the development of the town centre and regeneration of Lewisham Gateway per se but objecting to the height of the buildings and loss of green space
- Two letters from Lewisham Environment Trust which congratulate the Council on having brought forward proposals to replace the 'ill-fated' Lewisham 2000 roundabout scheme and supports the basic concept of Lewisham Gateway including the provision of a wider range of town centre uses and considers that the expansion of the town centre has 'overwhelming public support'. The Trust accepts the Low H road layout as a way of controlling private car use through 'restraint by congestion' and that cyclist should be prepared to dismount at major junctions. However in addition to concerns about the extent and timing of reconsultation on the scheme the Trust is of the view that in the 'rush to achieve', serious flaws in the scheme may be ignored and urges that in order to ensure that the expanded town centre is of the highest possible quality a few weeks (or months) are devoted to further discussion of the outline application in respect of the following:
  - strategic failure to join up the existing centres – consider the proposed Rennell Street pedestrian crossing to be inadequate and a potentially 'miserable environment' which could be overcome by a high level walkway between the Riverdale Centre and Gateway site. The Council should also require the Gateway applicants and Riverdale Centre owners to coordinate their proposals;
  - it is wrong to agree heights of blocks in advance of detailed design of mass and space – the Trust considers that the fundamental design problems with the scheme are not of height but mass;
  - inadequate provision for pedestrians – overcrowding and micro-climatic conditions (windiness) which need further detailed consideration and design response;



- inadequate open space provision and poor treatment of the rivers – limited soft landscaping within the site, failure to maximise the benefits of the river banks, extended culverting of the Ravensbourne and impact on wild life and bio diversity;
- sustainable construction – a lack of commitment to sourcing sustainable building materials and, reduction of embodied energy in both on and off-site construction processes and maximisation of natural ventilation and renewable energy technologies within the buildings;
- access to bus services is potentially confusing and recommend a condition should be imposed requiring high quality signage throughout the Gateway;
- A further letter from QWAG relating to an omission in the environmental impact assessment in terms of the lack of assessment of the impact of the proposed tall buildings on daylight and sunlight reaching the rivers, and a ‘particularly misleading statements’ in the Non-Technical Summary of the Environmental Statement in terms of the description of the nature, extent and impact of works to the rivers.
- 1 letter in support of the regeneration of the town centre from a local resident seeking to set up a small business.
- 18 letters supporting the Gateway development submitted to the applicants by local residents
- 138 questionnaire returns from local residents attending an exhibition organised by the applicants. The questionnaires include a range of comments both positive and negative on the proposed development and all ‘strongly agreeing’ or ‘agreeing’ with the statements that:
  - Lewisham town centre will benefit from regeneration
  - the proposals will make a positive contribution to Lewisham
  - I am generally in favour of the proposals

#### **1.4.2**

It is considered that whilst the additional representations received do not in general raise new issues that have not already been considered in Section 9 of the report of 6<sup>th</sup> September 2007, whilst the support for the principles of the gateway scheme expressed by the Lewisham Environment Trust is noted new/additional concerns are raised that need to be addressed. In terms of the link between the Gateway site and Riverdale Centre (including proposals for a high level walkway between the Riverdale Centre and Gateway site and need for the Gateway applicants and Riverdale Centre owners to coordinate their proposals) at the time of preparing the Planning Brief in 2002 the Council took the view that a crossing at grade (i.e. street level) on Rennell Street was the preferred solution for linking the Gateway site and existing town centre. Whilst the Planning Brief indicates that there would be potential to link a department store on the Gateway site with the existing shopping centre by bridge or basement routes it also refers to ‘new, simple, direct pedestrian crossings’, and the Development Framework (which formed the basis of the developer competition) shows at grade rather than high level crossings. Based on alternatives presented during the developer competition it was concluded that all crossings should be at

grade. This is considered to provide a more direct and accessible route for all people using the site. Whilst the Rennell Street crossing is currently aligned with the service route to properties on Lewisham High Street this is unlikely to be the long term situation and proposals submitted in recent years for a new department store at the northern end of the Riverdale Centre indicate the opportunities for new and improved links into the Centre as well as improvements to the environment on Rennell Street. Whilst those plans were not pursued, ongoing discussions with Land Securities (the owners of the Riverdale Centre) indicate that a more comprehensive approach to the development of the Centre is underway although delaying a decision on the Gateway application until these are complete would jeopardise the delivery of the Gateway scheme.

- 1.4.3** Policy LTC OPP2g in the emerging Lewisham Town Centre Area Action Plan encourages the redevelopment of the corner site north east of the Riverdale Centre which should respond positively to the Lewisham Gateway development and it is considered that Officers should maintain the dialogue with both LGDL and Land Securities (who are also in discussion about joint interests and the interface between the Gateway scheme and Riverdale Centre) to encourage a scheme that 'completes' this part of the town centre.
- 1.4.4** In terms of other points raised by the Environment Trust design, height and massing are dealt with in para. 9.2 of the 6<sup>th</sup> September report to the Strategic Planning Committee; pedestrian comfort in para. 9.6 and 9.7; open space provision and treatment of the rivers in para. 9.5; and sustainable construction in para. 6.10 of that report. The issue of signage for bus services is a matter that will be raised with London Buses to ensure the new layout is clear for bus users.

## **1.5 River Quaggy**

- 1.5.1** An application by Lewisham Gateway Development Limited for works to the River Quaggy east of Lewisham High Street were received by the Council on 5<sup>th</sup> September 2007. The application proposes works to open up part of the existing culverted section of the river immediately to the north of the Police Station, widen and reform the river channel and provide new planting within the channel, and resurface the road to the east to provide a shared surface for pedestrians and vehicles adjacent to the river. The works are between St Stephens Church and the proposed 'Quaggy Café' which forms part of the main Gateway application. Whilst the main Gateway application is not linked or dependent on the separate application for the Quaggy, the submission of the application is something that the Council has been seeking and is welcome, demonstrating that there is scope for significant enhancement of this stretch of the river within the parameters set by existing buildings and uses and the realigned Lewisham High Street as part of the development of the Gateway site. Consultation is underway and the application will be considered and reported in due course.
- 1.5.2** The proposals have been drawn up in consultation with the Environment Agency and there has also been consultation with the Police and LB Lewisham Transport regarding road safety issues and access to/from the Police Station for police vehicles. LB Lewisham was also involved in the consideration of early proposals for the river where a range of options from effectively 'do nothing' to extensive proposals by QWAG were discussed. Whilst the proposals do not reflect the aspirations of QWAG for this stretch of the Quaggy the proposals do nonetheless represent an improvement to the river corridor and one that is welcome as part of the improvement of the

environment in the town centre. Discussions regarding funding are underway, including via the EU INTERREG programme which links similar projects across Europe and it also proposed that part of the financial contribution from the main Gateway application is used to part fund the works to the Quaggy.

## **1.6 Policy Context**

**1.6.1** The Adopted Lewisham UDP (July 2004) will be replaced by a variety of Development Plan Documents (DPDs) that will form the new Local Development Framework (LDF) for Lewisham. Since the preparation of the report for the Strategic Planning Committee meeting on 6th September 2007 the Council has been Directed by the Secretary of State for Communities and Local Government concerning those policies from the UDP that have been 'saved' until they are replaced by the new DPDs. Planning policies relevant in the determination of this application referred to in the 6th September report but that have not been saved are listed in Appendix 1 to this update report. In the circumstances the London Plan and those UDP Policies which have been saved are subject to section 38 of the Planning and Compulsory Purchase act 2004 and other policies in the emerging DPDs are now material considerations to be taken into account in the determination of planning applications

**1.6.2** Policies not saved but referred to in the 6<sup>th</sup> September 2007 report are:

- STR.STC1 (Town Centres) which is a general policy to sustain and promote the vitality and viability of existing shopping centres. STR.STC2 and 3 (relating to town centres being the preferred location for large scale retail development and to seek improvements to the attractiveness, accessibility and environment of shopping centres remain. In addition Policy STC1 relating to the improvement of the function and character of the established shopping hierarchy remains. In the circumstances It is considered that the deletion of Policy STR.STC1 does not materially affect the determination of the current application.
- HSG17 (Sustainable Living Areas) which stated that when considering applications for residential development in these areas the Council may, subject to other policies in the Plan and the quality of the design of the proposed scheme, apply density, parking and other planning standards more flexibly. However, London Plan policy on density and parking (Policy 4B.3: Maximising the potential of sites) remains applicable. This policy seeks to ensure that development proposals achieve the highest possible intensity of use compatible with local context, the design principles set out elsewhere in the London Plan and with public transport capacity. The associated density matrix (Table 4B.1 of the London Plan) indicates densities of 650-1100hrh (and car parking at less than one space per unit) in central locations. Policy LTC HSG6 (Housing Density) in the Draft AAP states 'that for guidance, the Council will consider Lewisham Town Centre a 'Central' setting when referring to the London Plan Density Matrix'. In the circumstances it is considered that the policy basis for the high density development proposed exists in the London Plan and emerging AAP.

## **2. RECOMMENDATIONS**

### **2.1 RECOMMENDATION (A)**

To agree the principle of development and to refer the application and this report to The Mayor for London (Greater London Authority) under Article 4 of the Town and Country Planning (Mayor of London) Order 2000.

### **2.2 RECOMMENDATION (B)**

Subject to no direction being received from The Mayor for London, to refer the application to the Secretary of State for Communities and Local Government as a departure from the development plan (Town and Country Planning (Development Plans and Consultation) (Departures) Direction 1999) in respect of the loss of Metropolitan Open Land and under the Shopping Direction (Town and Country Planning (Shopping Development) (England and Wales) (No.2) Direction 1993) in respect of the retail floorspace proposed.

### **2.3 RECOMMENDATION (C)**

Subject to no direction being received from the Secretary of State for Communities and Local Government, authorise officers to negotiate a Section 106 Agreement to cover the following principal matters including such other amendments as considered appropriate to ensure the acceptable implementation of the development:

- affordable housing – up to 20% and likely to be shared ownership
- Lifetime Homes and wheelchair housing
- construction management
- highway works
- bus layover
- open space works
- river alteration works
- local employment
- public access
- open space maintenance
- mechanism for delivery of a mixed use scheme
- public art
- CCTV
- Travel Plan
- Design and Access Panel
- Renewable energy
- Site servicing and management
- Contribution to s.106 monitoring costs
- Financial contribution to town centre projects (works to the River Quaggy; a Waterlink Way fund; air quality monitoring; training for employment, Town Centre Manager)

### **2.4 RECOMMENDATION (D)**

Subject to the completion of a satisfactory Section 106 Agreement, authorise the Head of Planning to **GRANT PERMISSION** subject to conditions including those set out in Section 2.6 below and such amendments as considered appropriate to ensure the acceptable implementation of the development.

## 2.5 **RECOMMENDATION (E)**

If the Committee resolve that planning permission be granted that the Committee: -

- (i) confirms that it has taken the environmental information into account as required by Regulation 3(2) of the Town and Country Planning (Environmental Impact Assessment) Regulations 1999 and
- (ii) agrees that following issue of the decision the Head of Planning should place a statement on the Statutory Register pursuant to Regulation 21 of the Town and Country Planning (Environmental Impact Assessment) Regulations 1999 containing the information required by Regulation 21 and that for the purposes of Regulation 21(1)(c) the main reasons and considerations on which the Committee's decision was based shall be as set out in this report.

## 2.6 **Conditions**

Permission granted subject to the following conditions:-

### **Time Limit of Permission**

- 1. (a) Applications for approval of Reserved Matters must be made not later than the expiration of 5 years beginning with the date of the grant of this planning permission, and
- (b) The development to which this permission relates must be begun not later than:-
  - (i) The expiration of 5 years from the date of the grant of this outline planning permission, or
  - (ii) If later, the expiration of 2 years from the final approval of the Reserved Matters or, in the case of approval on different dates, the final approval of the last such matter to be approved.

### **Reason**

To comply with Section 92 of the Town and Country Planning Act 1990 and because of the scale and timescale of the development.

### **Reserved Matters/Details**

- 2. No Phase of the development shall be commenced until layouts, plans/sections, elevations and other supporting material for that Phase detailing:
  - (i) siting of the buildings and other structures;
  - ii) design of the buildings (including floor areas, height and massing);
  - iii) external appearance (including samples of the materials and finishes to be used for all external surfaces and including but not limited to roofs, elevation treatment, glazing);
  - iv) landscaping of all public and other areas.

have been submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority, the development shall in all aspects be carried out in accordance with the details approved under this Condition 2.

Reason

In order that the local planning authority is satisfied with the details of the proposed development.

Note: The means of access are shown on drawing 13902/200/10/01 Rev P9 are approved under this permission, as are details of the siting, design and external appearance of Building Block F as shown on drawings PA-0001 Rev D and PA-0002 Rev A.

3. No Phase of the development shall be commenced until details of the following matters in respect of that Phase have been submitted to and approved in writing by the local planning authority:
  - i) on-site vehicle servicing and parking;
  - ii) internal footpath layout, including all surface treatments;
  - iii) hard and soft landscaping and planting
  - iv) site boundary treatments
  - v) foul and surface water drainage, including on site and off site connections/improvements;

The development shall be carried out in accordance with the approved details.

Reason

In order that the local planning authority is satisfied with the details of the proposed development.

4. The Highway Infrastructure Works and River Alteration Works shall be in accordance with the scheme shown in drawings 13902/200/10/01 Rev P9, 13902/270/001 Rev P5, 13902/270/002 Rev P4, 13902/270/003 Rev P5, 13902/270/004 Rev P5 and 13902/270/005 Rev P5.

Reason

To ensure the satisfactory implementation of the planning permission.

5. The development (including demolition) shall not be commenced and no Reserved Matters applications shall be submitted until a Design Framework for the site containing the information required by the Design Framework Specification has been submitted to and approved in writing by the local planning authority. All Reserved Matters applications shall accord with the approved Design Framework.

Reason

In order that the local planning authority is satisfied with the details of the proposed development.

6. No Phase of the development shall be commenced until full details of access arrangements within that Phase for people with disabilities have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details and, unless otherwise agreed in writing by the local planning authority, any works and other arrangements required by the approved details shall be carried out prior to occupation of any building within the relevant Phase.

Reason

To facilitate accessibility and movement by those with mobility difficulties.

### **Scheme Parameters**

7. The development shall be carried out in strict accordance with the Parameter Plans and all Reserved Matters applications shall accord with the Parameter Plans.

Reason

In order to ensure that the development is carried out satisfactorily and accords with the parameters which have been subject to Environmental Impact Assessment.

### **Phasing**

8. The development (including demolition) shall not be commenced until details of the phasing of the development have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved phasing, unless otherwise agreed in writing by the local planning authority.

Reason

The local planning authority needs to be satisfied that development of the site is undertaken in a coherent and comprehensive manner, and that the development takes place within a reasonable timescale for the benefit of future occupiers and other residents of the area.

### **Land Uses**

9. The total built floorspace for the development shall not exceed 100,000 square metres (Gross External Area) and the maximum permitted floorspace for each use granted by this permission shall be (all figures Gross External Area):
- up to 57,000 m<sup>2</sup> residential (C3)
  - up to 12,000 m<sup>2</sup> shops, financial & professional services (A1 & A2)
  - up to 17,500 m<sup>2</sup> offices (B1)/education(D1)
  - up to 5,000 m<sup>2</sup> leisure (D2)
  - up to 4,000 m<sup>2</sup> restaurants & cafés and drinking establishments (A3 & A4)
  - up to 3,000 m<sup>2</sup> hotel (C1)
  - up to 1,000 m<sup>2</sup> hot food takeaways (A5)
  - up to 500 m<sup>2</sup> health (D1)

Reason

The development of the site has been the subject of an Environmental Impact Assessment which has been taken into account by the local planning authority in determining the application and any alteration to the scheme content may have an impact which has not been assessed by that process.

10. Building Block F (which is permitted for Class A3/A4 use) may be used on a temporary basis as a marketing and business suite in relation to the marketing of the development (the 'temporary use'). The period of any such temporary use shall not exceed 3 years from the date of first occupation for such temporary use. At the end of such 3 year period the temporary use shall cease and thereafter, unless otherwise agreed in writing by the local planning authority (and subject to any requirement for planning permission), Building Block F shall not be used other than for Class A3 or A4 purposes.

Reason:

To enable use of accommodation within the development in order to market the development.

**Restrictions on use**

11. Not more than 2,000m<sup>2</sup> (Gross External Area) shall be provided for Class A2 purposes, unless otherwise agreed in writing by the local planning authority.

Reason

In order to ensure the development contributes to improving the vitality and viability of the town centre as a major retail centre.

12. Not more than 1,500m<sup>2</sup> (Gross External Area) of the Class D2 floorspace shall be used for purposes other than a cinema unless otherwise agreed in writing by the local planning authority.

Reason

In order to ensure the development contributes to improving the vitality and viability of the town centre.

**Residential Amenity**

13. No part of the Class D1, D2, A1, A2, A3, A4, A5 or B1 floorspace provided within the development shall be open for customer business between the hours of 24.00 and 07.00, unless otherwise agreed in writing by the local planning authority.

Reason

To ensure that the proposed development does not prejudice the enjoyment of their properties by residents within the development and neighbouring occupiers and to comply with Policies ENV.PRO 11 Noise Generating Development, HSG 4 Residential Amenity and STC 9 Restaurants, A3 Uses and Take Away Hot Food Shops in the adopted Unitary Development Plan (July 2004).

14. Details of the design of the basement car-parking areas (including normal and emergency access/egress to/from them) within any Phase shall be submitted to and approved in writing by the local planning authority prior to the commencement of development within that Phase. Such details shall include ventilation of the basement areas, including the location of outlets and measures to attenuate noise and limit other airborne pollution to nearby sensitive receptors, particularly residents, to acceptable levels. The basement areas shall be constructed in accordance with the approved details. Unless otherwise agreed by the local planning authority in writing, each basement area shall be completed prior to occupation of the building of which it forms part.

Reason

To safeguard users and the amenities of occupiers of properties within the vicinity of the car-park area and to accord with Policy HSG 5 Layout and Design of New Residential Development in the adopted Unitary Development Plan (July 2004).

15. The rating level of the noise emitted from all fixed plant and premises shall be 10dB below the existing background level at any time, determined at the façade of any noise sensitive property. No Phase of the development shall be



commenced until a scheme (accompanied by measurements and assessments in accordance with BS4142:1997) identifying how the rating level is to be achieved and subsequently maintained have been submitted to and approved in writing by the local planning authority. No Phase of the development shall be occupied until the approved mitigation measures have been carried out. Thereafter the mitigation measures shall be maintained in accordance with the approved scheme, unless otherwise agreed in writing by the local planning authority.

**Reason**

To safeguard the amenities of residents and other occupiers in and around the site and to comply with Policies HSG 4 Residential Amenity in the adopted Unitary Development Plan (July 2004), and to ensure any impacts arising from the proposed development (and any measures required to mitigate those impacts) are consistent with those identified in the Environmental Statement accompanying the application.

16. No Phase of the development shall be commenced until a scheme for the insulation of residential units against external noise which scheme when implemented will result in noise levels not exceeding 30dB LAeq (night) for bedrooms and 35dB LAeq (day) for other habitable rooms (in each case with windows shut and other means of ventilation provided), together with details in relation to the subsequent maintenance of such sound insulation scheme, have been submitted to and approved in writing by the local planning authority. No building shall be occupied until the approved sound insulation scheme has been implemented in its entirety in relation to that building. Thereafter, the sound insulation scheme shall be maintained in accordance with the approved scheme, unless otherwise agreed in writing with the local planning authority.

**Reason**

To safeguard the amenities of residents and to comply with Policy HSG 4 Residential Amenity in the adopted Unitary Development Plan (July 2004), and to ensure any impacts arising from the proposed development (and any measures required to mitigate those impacts) are consistent with those identified in the Environmental Statement accompanying the application.

**Residential amenity Space**

17. No Phase of the development shall be commenced until details of the configuration and extent of the provision of communal and/or private residential amenity space, including the provision of children's play space, within that Phase have been submitted to and approved in writing by the local planning authority. Such details shall also include a timetable for provision of such communal and/or private residential amenity space and children's play space by reference to levels of occupation of buildings within the Phase in question and unless otherwise agreed in writing by the local planning authority, the level of occupation as identified in the approved timetable shall not be exceeded until the communal and/or private residential amenity space associated with such building has been completed in accordance with the approved details.

**Reason**

In order to ensure the appropriate provision of communal and/or private residential open space and to comply with Policies HSG 5 Layout and Design of New Residential Development and HSG 7 Gardens in the adopted Unitary Development Plan (July 2004).

### **Lighting**

18. No Phase of the development shall be commenced until full details of lighting and external illumination for that Phase have been submitted to and approved in writing by the local planning authority. Lighting design will comply with CIBELG6, code for lighting and BS5489. The details shall be accompanied by a programme for installation of the lighting and external illumination by reference to the occupation of buildings within the relevant Phase and, unless otherwise agreed in writing by the local planning authority, the level of occupation of any building as identified in the approved timetable shall not be exceeded until all relevant lighting and external illumination associated with such building has been installed in accordance with the approved details.

#### **Reason**

In order to safeguard the general amenities of the local area and to accord with Policies HSG 4 Residential Amenity and HSG 5 Layout and Design of New Residential Development in the adopted Unitary Development Plan (July 2004) and to control light pollution of the night sky.

### **Microclimate**

19. The development (excluding Building Block F) shall be designed using the Lawson Criteria for Distress and Comfort as a guide to the appropriate minimum level of amenity that needs to be achieved and this shall be reflected in all Reserved Matters applications.

#### **Reason**

In order to ensure a suitable environment for visitors and residents and to accord with Policy HSG 5 Layout and Design of New Residential Development in the adopted Unitary Development Plan (July 2004) and to ensure that any environmental impacts of the development do not exceed those assessed and taken into account by the local planning authority when determining the planning application.

20. All applications for Reserved Matters pursuant to Condition 19 shall be accompanied by details (for approval) of the measures to achieve appropriate minimum levels of amenity. No part of the development shall be occupied until the approved measures have been carried out in relation to that part of the development in accordance with the approved details and such measures shall be retained in situ in perpetuity unless otherwise agreed in writing by the local planning authority.

#### **Reason**

In order to ensure a suitable environment for visitors and residents and to accord with Policy HSG 5 Layout and Design of New Residential Development in the adopted Unitary Development Plan (July 2004) and to ensure that any environmental impacts of the development do not exceed those assessed and taken into account by the local planning authority when determining the planning application.

### **Movement**

21. Prior to commencement of any Phase of the development, a Parking Management Strategy setting out measures to control access to and the management of roads within that Phase shall be submitted to and approved in writing by the local planning authority. The measures set out in the approved Parking Management Strategy shall be implemented prior to occupation of the

relevant Phase of the development and access and parking within the site shall be managed and enforced in accordance with the approved strategy.

Reason

In order to safeguard the amenities of adjoining residential areas in compliance with Policy TRN 21 Traffic Management in the adopted Unitary Development Plan (July 2004). The development of the site is the subject of an Environmental Impact Assessment and any material alteration to the proposed uses may have an impact which has not been assessed by that process.

22. The site shall be serviced by 10m rigid vehicles or smaller, and vehicles shall not enter the site between 0700 to 1000 hours and 1600 to 1900 hours, Monday to Friday.

Reason

In order to ensure the efficient operation of the road network in compliance with Policy TRN 9 Shopping Areas in the adopted Unitary Development Plan (July 2004).

23. The detailed layout of all buildings at ground level shall be modelled and designed to ensure that the pavement width allows the free flow of pedestrians through the site and does not prejudice pedestrian safety. All Reserved Matters applications shall be accompanied by a statement demonstrating how the design accords with these requirements.

Reason

In order to ensure the safety and comfort of pedestrians.

24. No Phase of the development shall be commenced until details of the provision for cycle parking for residents, visitors and people working on the site, including the numbers, type of cycle stands and their location for buildings within that Phase have been submitted to and approved in writing by the local planning authority. The cycle parking and cycle stands shall be provided in accordance with the approved details prior to occupation of the relevant building and shall be permanently retained for such purposes, unless otherwise agreed in writing by the local planning authority.

Reason

In order to ensure that an adequate provision is made for cycle users in accordance with the strategy submitted by the applicant and to accord with Policies TRN 14 Cycle Parking and TRN 15 Provision for Cyclists and Walkers in the adopted Unitary Development Plan (July 2004).

**Archaeology and Cultural Heritage**

25. Prior to commencement (including demolition) of any Phase of the development (including infrastructure works) the developer shall submit to the local planning authority for approval a strategy to afford access at all reasonable times to the site by archaeologist(s) nominated by the local planning authority and allow them to observe the excavations and record items of interest and finds. The strategy shall be implemented and complied with as approved

Reason

In order to safeguard the archaeological assets of the site and to comply with Policy URB 21 Archaeology in the adopted Unitary Development Plan (July 2004).

### **Ecology**

26. No Phase of the development shall be commenced until details (including location, design, dimensions and materials) of green and brown roofs for that Phase have been submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority, the green and brown roofs required by this Condition shall be completed in accordance with the approved details prior to the occupation of the building of which they form part.

#### **Reason**

To ensure that the development is carried out in accordance with mitigation measures identified in the Environmental Statement and to comply with Policy OS 13 Nature Conservation in the adopted Unitary Development Plan (July 2004).

### **Landscape**

27. Prior to the commencement of development within any Phase (excluding demolition works) a scheme for the landscape works within and treatment of the surroundings of that Phase (including both public and private areas of open space and, as appropriate, incorporating any noise impact mitigation measures) shall be submitted to and approved in writing by the local planning authority. Such a scheme shall include:
- a. the position and spread of all existing trees to be retained and/or removed;
  - b. new tree and shrub planting including species, plant sizes and planting densities;
  - c. means of planting, staking and tying of trees, including tree guards;
  - d. areas of hard landscape works including paving and details, including samples, of proposed materials;
  - e. details of the treatment of the external boundary of the site;
  - f. details of how the proposed landscaping scheme will contribute to wildlife habitat;
  - g. where the Phase encompasses rivers, planting with particular focus on the entrance and exit of culverts and the river buffer zones;
  - h. timescales for implementation;
  - i. a management plan for future maintenance of landscaped areas.

#### **Reason**

To ensure a satisfactory development that enhances the visual amenity of the locality and to comply with Policies URB 3 Urban Design and URB 12 Landscape and Development in the adopted Unitary Development Plan (July 2004) and further, in relation to Condition 27 i, to protect, restore or replace natural features of importance within or adjoining the watercourses .

28. No part of the development shall be occupied until any planting, seeding or turfing for that part of the development included in the details approved under Condition 27 has been completed in accordance with the landscaping scheme and programme approved under Condition 27. Any trees, shrubs, plants or grassed areas which are removed or damaged, or which die or become

diseased within 5 years following the date of planting shall be replaced within the next planting season with planting of similar species and size. Unless otherwise agreed in writing by the local planning authority, all landscaping shall be maintained in accordance with the landscaping scheme approved under Condition 27 i.

**Reason**

To ensure a satisfactory appearance and setting for the proposed development and to ensure that it enhances the visual amenity of the area and to comply with Policies URB 3 Urban Design, URB 12 Landscape and Development in the adopted Unitary Development Plan (July 2004).

**Construction: Code of Construction Practice**

29. The development (including demolition) shall not be commenced until details of a Code of Construction Practice and Construction Method Statement (CCP&CMS) for the entire site and details specific to each Phase have been submitted to and approved in writing by the local planning authority. The CCP&CMS shall include arrangements obliging the applicant, or developer and their respective contractors to use all reasonable endeavours to minimise disturbances including, but not limited to noise, vibration, dust and smoke emanating from the site including from construction vehicles. The development shall be carried out in accordance with the approved CCP&CMS.

**Reason**

To limit the detrimental effect of demolition and construction works on adjoining residential occupiers by reason of noise and disturbance.

30. No Phase of the development shall be commenced until defined access routes to the site for all vehicular modes relating to the demolition and construction for that part of the development (including delivery of materials/removal of waste) have been submitted to and approved in writing by local planning authority for that part of the development. Such details shall be implemented in accordance with the approved details unless otherwise agreed in writing with the local planning authority.

**Reason**

To ensure the appropriate routing of construction traffic to safeguard the amenity of local residents and to ensure that the proposed development does not prejudice the free flow of traffic or the conditions of general safety along the neighbouring highway.

31. No Phase of the development (including demolition) shall be commenced until details of the Air Pollution Risk Assessment (APRA) for the entire site and details specific to the relevant part of the development has been submitted to and approved in writing by the local planning authority. The APRA shall include arrangements obliging the applicant, or developer and their respective contractors to implement the monitoring and control measures that correspond to the risk rating for the site. The APRA shall be carried out in accordance with the London Best Practice Guide: The control of dust and emissions from construction and demolition (published in November 2006).

**Reason**

To limit the detrimental effect of demolition and construction works on adjoining residential occupiers by reason of air pollution.

32. The development shall not be commenced until details of the use, handling or storage of any hazardous substances included in the Schedule to the Planning (Hazardous Substances) Regulations 1992 have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

Reason

To prevent pollution of the water environment.

### **Hydrology and Water Resources**

33. The proposed measures set out in the Flood Risk Assessment submitted with the application shall be implemented in full prior to commencement of the relevant part of the development.

Reason

In order to ensure that appropriate flood attenuation measures are implemented including the incorporation of Sustainable Urban Drainage measures as set out in the Environmental Statement in full and to safeguard occupiers of the site and surrounding areas.

34. Details of finished floor levels for all buildings within each Phase shall be submitted to, and approved in writing by, the local planning authority before development within that Phase commences. The development shall be carried out in accordance with the approved details.

Reason

To reduce the risk of flooding to property.

35. Details of all ground levels and crest levels adjacent to the rivers within the site shall be submitted to and approved in writing by the local planning authority before the development is commenced.

Reason

To minimise the risk of flooding.

36. Prior to commencement of the development, a detailed scheme for the maintenance and renewal of the river bed and banks including the enhancement of the riverside, (and culverts and newly formed channels) as stated within the Environmental Statement and associated drawings shall be submitted to and approved in writing by the local planning authority in writing. The scheme will include the design, method of construction, dimensions and materials, and measures for the control of pollution and of invasive plant species. The scheme shall be implemented as approved.

Reason

To protect and enhance the ecological value of the Rivers Ravensbourne and Quaggy and to ensure adequate construction method statements are submitted and suitable long term maintenance agreements put in place.

37. Prior to commencement of development, a detailed scheme for the monitoring (both pre and post development and including timescales for such monitoring and the submission of results to the local planning authority) of ecological enhancements within the river channels shall be submitted to and approved in writing by the local planning authority. The scheme shall be implemented as

approved and all monitoring results shall be submitted to the local planning authority in writing in accordance with the approved timescales.

Reason

To quantify the ecological outcomes of the proposed scheme, monitor the ecology of the existing and restored river habitats in the proposed development, and to assess any changes from the existing situation and the success of the proposed environmental enhancements to the river channels.

38. There shall be no light spill into the watercourses and the adjacent river corridor habitat. To achieve this, and to comply with sustainability, all artificial lighting shall be directional and focused with cowlings to light sources in close proximity to the river corridor.

Reason

Artificial lighting disrupts the natural diurnal rhythms of a range of wildlife using/inhabiting the river and its corridor habitat.

39. The development shall not be commenced until details of surface water source control measures for the development have been submitted to and approved in writing by the local planning authority. The development shall be implemented in accordance with the approved details, unless otherwise agreed in writing with the local planning authority.

Reason

To prevent pollution of the water environment and increased risk of flooding.

**Site Contamination**

40. No Phase of the development (including demolition) shall be commenced until each of the following have occurred:
- (i) a site investigation has been carried out to survey and assess the extent and effect (on and off-site) of potential contamination; and
  - (ii) a report comprising the results of that site investigation and recommendations for treatment of any contamination (whether by remedial works or not) has been submitted to and approved in writing by the local planning authority.
41. If during the carrying out of any works at the site contamination is encountered which has not previously been identified (“the new contamination”), then Condition 41 shall apply to the new contamination, and no further development shall take place until the requirements of Condition 41) have been complied with in relation to the new contamination.
42. The development shall not be occupied until:
- (i) all measures or treatments identified in the report approved under Condition 41 have been implemented in full.
  - (ii) a report (“closure report”) has been submitted to and approved in writing by the local planning authority. The closure report shall include details of both the remediation (including waste materials removed from the site; an audit trail demonstrating that all imported or reused soil material conforms to current soil quality requirements as approved by the local planning authority), and any post-remediation sampling, that has been carried out.

Reason

To ensure that the local planning authority may be satisfied that any site contamination is remedied in view of the historical use(s) of the site, which may have included industrial processes.

**Waste**

43. The development shall not be commenced until details of a site-wide Waste Strategy (including, without limitation, long term objectives, management responsibilities and measures for each Phase or part thereof) has been submitted to and approved in writing by the local planning authority. All measures for each Phase of the development shall be implemented in strict accordance with the approved Waste Strategy. No Phase of the development shall be commenced until the approved measures for any previous Phase have been completed. In the case of the final Phase of development, the approved measures shall be implemented within 12 months of completion, of that Phase, unless otherwise agreed in writing by the local planning authority.

Reason

To minimise and manage the production of waste during the operation of the development

**Sustainability and Energy**

44. The development shall not be commenced until a site-wide Energy Strategy has been submitted to and approved in writing by the local planning authority. Reserved Matters applications for each Phase of the development shall include details of how the energy strategy and agreed development commitments will be secured for that Phase and the development shall be implemented in accordance with the approved scheme.

Reason

To ensure commitments made within the Outline Planning Energy Statement (June 2007) are implemented.

45. Reserved Matters applications in respect of the design of relevant parts of the development or part thereof shall be accompanied by an Independent Sustainability Assessment in accordance with the Building Research Establishment guidelines, on an individual building or land-use basis. Residential properties within the development are to achieve at least an indicative Code for Sustainable Homes Level 3 rating and other buildings a BREAMM 'Very Good' rating (or equivalent) on these design stage assessments.

Reason

To provide an independent assessment of the standards of sustainable development to be achieved by the scheme.

46. Prior to occupation of any residential properties within the development, a BRE "Post-Construction Review" shall be submitted to the local planning authority on the elements of the scheme as built to ensure at least a Code for Sustainable Homes Level 3 rating was achieved for those residential properties and BREAMM 'Very Good' rating (or equivalent) for other buildings.



## Reason

To ensure enforceability of conditions and obligations by verifying the standards and measures achieved on-site.

### **2.7 Informatives:**

1. *Prior to the submission of reserved matters applications for buildings on the site incorporating residential units the applicant is advised to consult the local planning authority regarding options for the mitigation of noise conditions within the residential accommodation with the priority being to minimise the number of habitable rooms exposed to high noise levels.*
2. *The applicant is advised that details of the strategy for providing noise insulation grants to eligible properties should be submitted to the Council prior to the commencement of development.*
3. *The applicant is advised to consult with the Council's Environmental Health regarding measures to control construction impacts (Conditions 29-32).*
4. *The Contractor is recommended to apply to the Council for Section 61 consents under the Control of Pollution 1974 for each separate phase of construction. The application should be submitted well in advance of the works in order to allow Lewisham Environmental Health to give it due consideration within its statutory 28 day determination period. Where possible, a draft application should be submitted to the Local Authority to initiate discussions on the actual application.*

### **2.8 Definitions and interpretation**

A. Where in this permission the following terms and expressions are used, they shall have the following meanings: -

A1. "Class" means a use class as specified in the Town and Country Planning (Use Classes) Order 1987 (as amended);

"Design Framework Specification" means the design framework specification annexed to this permission;

"Environmental Statement" means the environmental statement prepared by Peter Brett Associates and submitted with the application in April 2006 together with the Environmental Statement Addendum submitted in July 2007;

"Environmental Statement Addendum" means the Environmental Statement Addendum submitted in July 2007;

"Parameter Plans" means the following drawings approved by this permission and setting the parameters for the development: - AA39175/OP-0002A, AA39175/OP-0003A, AA39175/OP-0004A, AA39175/OP-0005A, AA39175/OP-0006A, AA39175/OP-0007A, AA39175/OP-0008A;

"Phase" means a phase of the development as approved by the local planning authority pursuant to Condition 6;

“Reserved Matters” means the details required to be submitted to and approved by the local planning authority pursuant to Condition 2;

- A2. “Gross External Area” means gross external area as measured in accordance with the Royal Institution of Chartered Surveyors Code of Measuring Practice (Fifth Edition or any edition superseded it).
- A3. References to the site are references to the application site as shown on the approved site application drawing (13902-002/1.1)

Committee	STRATEGIC PLANNING COMMITTEE		Item No. 4
Report Title			
Ward			
Contributors			
Class	PART 1	4 OCTOBER 2007	

## **MINUTES**

### **Recommendation**

To approve the minutes of the meeting of the Strategic Planning Committee held on 30 November 2006.

**The London Plan (February 2004 and Alterations December 2006) and Further Alterations (September 2006)**

**2A.5: Town centres**

The Mayor will promote the strategic importance of London's Town Centres in accommodating economic growth and improving the sustainability of development. UDP policies should exploit and enhance the accessibility of town centres, provide a full range of functions and seek to enhance vitality and viability.

**3A.4: Housing choice**

UDP policies should ensure new developments offer a range of housing choices for all communities, built to 'Lifetime Homes' standards and 10% wheelchair accessible.

**3A.7: Affordable housing targets**

UDP policies should set an overall target for affordable housing based on an assessment of housing needs and these should take into account the Mayor's strategic target of 50% affordable provision.

**3A.8: Negotiating affordable housing in individual private residential and mixed-use schemes**

Boroughs should seek the maximum reasonable amount of affordable housing when negotiating on mixed-use scheme taking into account their targets and the need to encourage rather than restrain residential development. Targets should be applied flexibly.

**3D.9: Metropolitan Open Land**

Boroughs should maintain the protection of MOL from inappropriate development.

**4A.6: Improving Air Quality**

Boroughs should implement the Mayor's Air Quality Strategy and achieve reductions in pollutant emissions through various means including reducing the need to travel by car, promoting sustainable design and construction and ensuring the air quality is considered at a planning application stage.

**4A.8: Energy assessment**

Boroughs should request an assessment of the energy demand for proposed major developments and developments should demonstrate proposed heating and cooling systems have been selected in order of preference with passive design most favoured and gas central heating least favoured.

**4A.9: Providing for renewable energy**

Major developments required to show how the development would generate a proportion of the site's electricity or heat needs from renewables.

**4B.3: Maximising the potential of sites**

Boroughs should ensure development proposals achieve the highest possible intensity of use compatible with the local context, design principles and public transport.

#### **4B.6: Sustainable design and construction**

Boroughs should ensure developments meet the highest standards of sustainable design and construction.

#### **4B.9: Large-scale buildings – design and impact**

All large-scale buildings should be of the highest design quality and take into account a number of elements including being suited to their wider context, illustrate exemplary standards of sustainable construction, be sensitive to their impact on micro-climate, be appropriate to transport capacity, provide high quality spaces relating positively to water spaces and contain a mix of uses.

#### **4C.20: Design – starting from the water**

Boroughs should seek a high quality of design for all waterside development which should reflect local character, meet the principles of good design and improve the quality of the built environment.

#### **4C.31: Rivers, Brooks and Streams**

Boroughs should ensure that rivers are protected, improved and respected and measures taken to improve their habitat and amenity value.

### **Lewisham LDF Core Strategy**

#### **CP1 Major Growth Corridor**

The Council will support substantial new development that contributes to the regeneration of the borough.

#### **CP2 Lewisham and Catford town centres**

The regeneration of Lewisham Town Centre will be guided by policies, proposals and site allocations set out in the Area Action Plan. This includes proposals to elevate the status of Lewisham to that of a Metropolitan Town Centre.

#### **CP5 Conservation and Protection**

Development required to protect or enhance the character of conservation areas and will not be permitted if considered inappropriate in the context of open space or biodiversity protection.

#### **CP6 Sustainable Development**

A sustainable pattern of development will be sought in Lewisham by encouraging a mix of land uses focussed in areas with good public transport, ensuring development at an appropriate scale and form in response to the context, promoting sustainable design and construction and minimising the impact on the natural environment.

#### **CP7 Climate Change**

Development required to reduce greenhouse gas emissions through sustainable design and construction methods, decentralised energy systems and renewable energy generation and increased use of sustainable modes of transportation.

#### **CP8 Water Management and Flood Risk**

The Council will require development to minimise and control the risk of flooding and conserve water resources.

### **CP16 Housing Mix and Location**

A mixed and balanced community will be sought through a range of dwelling types, sizes and tenures.

### **CP17 Promoting Good Design – Development in Context and Density of Development**

The council will ensure that new development is provided at an appropriate urban scale and form in response to the local context. Density will vary according to its location, setting, public transport accessibility and capacity of the area. New development should be well designed, improve urban design quality, deliver and influence crime prevention, design for safety in town centres and provide clear routes.

### **CP18 Conservation of the Historic Environment**

The Council will preserve or enhance listed buildings and their settings, the character and appearance of conservation areas and archaeological heritage.

### **CP19 River Thames, Deptford Creek and the Ravensbourne River Network**

Development should preserve and enhance the character of all the rivers in the Borough. Development adjacent to rivers should contribute to their special character by improving urban design quality and the vitality of river frontages, improve access to the foreshore and naturalise flood defences where appropriate.

### **CP21 The Natural Environment**

The Council will resist any inappropriate form of development which would detract from the visual amenity, provision, quality, conservation role and any other designation of the natural environment.

### **CP22 Deficiency of Open Space**

The Council will seek to address areas deficient in open space through a combination of the provision of additional space and enhancement of existing spaces.

### **CP25A and B Walking and Cycling**

The Council will provide, facilitate and encourage safe and convenient pedestrian and cycle movement through innovative and tried and tested methods.

### **CP30 Role, Function and Character of Retail Centres**

The role and function of the established retail hierarchy will be maintained. Projects which seek to improve the character, vitality and viability of the borough's retail centres will be encouraged.

### **CP31 Uses Within the Major and District Town Centres**

The Council will expect major retail development to be located within major and district centres.

### **Lewisham Town Centre Area Action Plan**

#### **LTC OPP1: Lewisham Gateway Opportunity Area**

Proposals required to be in conformity with policies set out within the AAP including improved transport interchange, safe and convenient pedestrian environment, commercial development befitting a metropolitan town centre, the highest standard of design and improved links.

### **LTC OPP1a: General Principles for Lewisham Gateway**

The Council strongly supports the principles behind the Lewisham Gateway initiative. The Council will require the proposal to embody a number of objectives set out with the AAP.

### **LTC SH1: Lewisham Town Centre**

The Council will seek to increase the amount of retail floor space to support Lewisham's move from a Major Centre to Metropolitan Centre. It is anticipated that some of this will be provided by Lewisham Gateway.

### **LTC SH2: Vitality and Viability**

Development should sustain and enhance the vitality and viability of the town centre. The Council will encourage public realm enhancements, mixed use development and a greater component of residential development in the town centre.

### **LTC SH7: Retail Character Areas**

The retail character that should be aspired to in Lewisham Gateway is a mix of retail and leisure uses. The creation of open space at the confluence of the rivers provides opportunities for cafes, bars and similar uses.

### **LTC URB1: Tall Buildings in Lewisham Town Centre**

Planning applications for tall buildings may be permitted in Lewisham Town Centre subject to an assessment of their design which should be of the highest quality, the degree to which a positive response is made to the urban setting and townscape. Transport accessibility and impact, visual impact on views, effect on listed buildings, conservation areas, MOL and other open spaces, relationship to other tall buildings and the town's topography and the impact on the microclimate.

### **LTC URB2: Sustainability**

Development should be designed to achieve the best possible outcomes in terms of sustainable development through various means including high densities, mix of tenures, the use of natural resources including rivers, renewable energy, SUDS, flood risk protection, Air Quality Impact Assessment and waste management plans.

### **LTC URB7: Enhancing Lewisham's Waterways**

New development in close proximity to rivers should be designed to address the river positively, create attractive waterfront environments, respect and enhance natural habitats and accommodate flood defences.

### **LTC HSG4: Affordable Housing**

The Council will seek to secure 35% of new residential build as affordable housing in a tenure mix of 70% social rented and 30% intermediate provision.

### **LTC HSG6: Housing Density**

Housing densities will be expected to be appropriate to the local setting in terms of existing building form, massing and character.

### **LTC OS1: Retention of Metropolitan Open Land**

In general, the open character of MOL will be protected. In exceptional circumstances such as Lewisham gateway, the Council will consider the re-provision and alteration of the boundary where the regeneration benefits make a

significant positive contribution to the quality of MOL and the vitality of the town centre.

**LTC OS2: Waterlink Way and Celebrating the River Confluence**

The Council will encourage the celebration of the confluence of the Rivers Quaggy and Ravensbourne and the creation of Confluence Park within Lewisham Gateway.

**LTC ENV1: Protect and Enhance the Environs of the River**

The Council will seek to protect and enhance the environs of the Rivers Quaggy and Ravensbourne. New development on sites benefiting from river settings should seek to maximise the contribution they make to the quality of the town centre environment.

**Relevant Deleted LB Lewisham UDP Policies (Adopted July 2004)**

URB 7 Access to Buildings for People with Disabilities

HSG 3 Provision of Housing Sites

HSG 13 Affordable Housing

HSG 16 Density

ENV.PRO 19 Energy Efficiency

ENV.PRO 7 Environmental Impact Assessment

ENV.PRO 8 Air Quality Management Areas



**APPENDIX 2: REPORT OF 6 SEPTEMBER 2007**

Committee	STRATEGIC PLANNING COMMITTEE	Item No. 3
Report Title	LEWISHAM GATEWAY SE13	
Ward	Lewisham Central/Blackheath	
Contributors	John Miller and Emma Talbot	
Class	PART 1	Date 6 SEPTEMBER 2007

<b>CONTENTS</b>		Page
<b>1.</b>	<b>INTRODUCTION</b>	7
1.1	Purpose of this Report	7
1.2	Background	7
<b>2.</b>	<b>APPLICATION DETAILS</b>	8
2.1	Registered Number/Case File Reference	8
2.2	Application Date	8
2.3	Applicant	8
2.4	Proposals	8
2.5	Application Documents	9
2.6	Scope of the Application	10
<b>3.</b>	<b>LEWISHAM GATEWAY</b>	11
3.1	Urban Renaissance Lewisham	11
3.2	Developer Selection & Pre-Application Consultation	12
<b>4.</b>	<b>APPLICATION, SITE AND SURROUNDINGS</b>	12
4.1	Site Description	12
4.2	Planning History	14
4.3	Current Application	14
4.4	Environmental Impact Assessment	16
4.5	Transport Assessment	17
<b>5.</b>	<b>CONSULTATION</b>	17
5.1	Consultation Process	17
5.2	Consultation Responses (Summary)	18
<b>6.</b>	<b>PLANNING CONSIDERATIONS</b>	25
6.1.	Introduction	25
6.2	Policy Context	26
6.3	Land Use, Town Centre and Retail	28
6.4	Metropolitan Open Land	32
6.5	Scale, Density, Massing and Design	34
6.6	Residential and Affordable Housing	40
6.7	Conservation Areas and Listed Buildings	41
6.8	Rivers, Open Space and Environment	43
6.9	Social Infrastructure	46
6.10	Sustainability, Renewable Energy and Sustainable Construction	47
6.11	Access and Highways	48
6.12	Other Considerations	48

<b>7.</b>	<b>ENVIRONMENTAL IMPACT ASSESSMENT</b>	<b>50</b>
7.1	Introduction	50
7.2	Consideration of Alternatives	51
7.3	Development Programme and Construction Sequencing	52
7.4	Socio-economic	53
7.5	Transport	54
7.6	Air Quality	54
7.7	Noise and Vibration	56
7.8	Water Resources and Flood Risk	58
7.9	Archaeological Resources and Cultural Heritage	59
7.10	Ecology and Nature Conservation	60
7.11	Townscape and Visual	61
7.12	Wind	63
7.13	Daylight and Sunlight	64
7.14	Land Quality	66
7.15	Other Issues Considered	67
7.16	Impact Interaction, Cumulative Effects and Environmental Response	67
7.17	Conclusion	67
<b>8.</b>	<b>TRANSPORTATION</b>	<b>67</b>
8.1	Introduction	67
8.2	Overview of Transport Proposals	68
8.3	Public Transport Services	69
8.4	Highway Impacts	70
8.5	Access, Parking and Servicing	72
8.6	Pedestrians and Cyclists	73
8.7	Impact on Public Transport and Taxis	74
8.8	Disabled Access and Shopmobility	76
8.9	Travel Plan	77
8.10	Conclusion	77
<b>9.</b>	<b>CONSIDERATION OF OBJECTIONS</b>	<b>77</b>
9.1	Introduction	77
9.2	Scale of Development and Tall Buildings	78
9.3	Impact on the Existing Town Centre	79
9.4	Housing	79
9.5	Loss of Metropolitan Open Land, Open Space and Impact on Rivers	79
9.6	Traffic	80
9.7	Environmental Impact	81
<b>10.</b>	<b>LEGAL AGREEMENTS</b>	<b>81</b>
10.1	Introduction	81
<b>11.</b>	<b>CONCLUSION</b>	<b>82</b>
11.1	Lewisham Gateway	82
11.2	Implementation	83

<b>12.</b>	<b>RECOMMENDATIONS</b>	84
12.1	Recommendations	84
12.2	Conditions	85

<b>APPENDICES</b>		
A1	Map showing extent of consultation	96
A2a	Summary of comments received	97
A2b	Comments on Lewisham Gateway received after submission of supplementary information and revised plans	147
A3	Relevant policies	169

## **1. INTRODUCTION**

### **1.1 Purpose of this Report**

1.1.1 In April 2006 the Council received an application submitted by Lewisham Gateway Developments Limited (LGDL - a joint venture between Amec Developments Limited and Taylor Woodrow Developments Limited) and the London Development Agency for the comprehensive redevelopment of land between Rennell Street and Lewisham railway station. This is a major scheme with wide and significant implications for the town centre involving major changes to the layout of the main road network and a significant scale of development comprising up to 100,000m<sup>2</sup> of residential, retail, commercial and leisure space together with realignment of the roads and works to the Ravensbourne and Quaggy rivers.

1.1.2 This report considers the application in the light of relevant planning policy and guidance, representations received and other material considerations and makes recommendations on the determination of the application.

### **1.2 Background**

1.2.1 Section 3 of this report sets out the context for this application however a brief chronology of events is:

- July 2000 – LB Lewisham secures £15.9m SRB funding to regenerate the town centre
- 2001 – Urban Renaissance in Lewisham (URL) the SRB funded regeneration body is launched
- June 2002 – consultation on Lewisham Gateway redevelopment options
- December 2002 – Lewisham Gateway Planning Brief approved by Strategic Planning Committee and by Mayor and Cabinet in July 2003
- July 2003-April 2004 – public competition to select developer for the Gateway scheme
- April 2004 – Lewisham Gateway Developments Limited appointed to redevelop the Gateway site.
- April 2006 – planning application submitted

1.2.2 The proposals have been the subject of extensive consultation with local residents, businesses and community groups as well as statutory consultees both before and after the current planning application was submitted. In accordance with the Council's Statement of Community Involvement, following receipt of objections to the application a public meeting has been held as well as two two-day exhibitions. In addition, and independent of the Council's consultation, the applicants have undertaken their own consultation and publicity. There have also been updates through URL Newsletters on the emerging Gateway proposals, planning application and wider town centre initiatives.

1.2.3 Given the scale of development and uses proposed the application represents a strategic proposal under the Greater London Authority Act 1999 Town & Country Planning (Mayor of London) Order 2000 and if the Committee resolves to grant planning permission the application needs to be referred to the GLA. In addition, due to the amount of retail floorspace proposed and due to the application involving a departure from the

development plan (loss of Metropolitan Open Land), if the Committee resolve to grant permission the application will also have to be referred to the Secretary of State for Communities and Local Government under the Shopping Direction (Town and Country Planning (Shopping Development) (England and Wales) (No.2) Direction 1993) and as a departure from the development plan (Town and Country Planning (Development Plans and Consultation) (Departures) Direction 1999).

## **2. APPLICATION DETAILS**

### **2.1 Registered Number/Case File Reference**

2.1.1 DC/06/62375 and DC/06/62375B

2.1.2 LE/152/Z/TP

### **2.2 Application Date**

2.2.1 The application is dated 26<sup>th</sup> April 2006.

2.2.2 On 6 February 2007 the Council issued a letter under Regulation 19 of the Town & Country (EIA) (England and Wales) Regulations 1999 requiring further information to be submitted in respect of the environmental impact of the proposed development. Separately, additional information on transport and access was requested including further modelling work. This further information in respect of the Environmental Statement and other additional information regarding the application together with amended plans was received on **4<sup>th</sup> July 2007**. In accordance with the relevant Regulations receipt of the information has been advertised and further consultation undertaken.

### **2.3 Applicant**

2.3.1 The application was submitted by RPS Planning on behalf of **Lewisham Gateway Developments Limited** and the **London Development Agency**.

### **2.4 Proposals**

2.4.1 The application is for the comprehensive mixed use redevelopment of the site for up to 100,000 m2 comprising retail (A1, A2, A3, A4 and A5), offices (B1), hotel (C1), residential (C3), education/health (D1) and leisure (D2) with parking and associated infrastructure, as well as open space and water features as follows:

- up to 57,000 m2 residential (C3)
- up to 12,000 m2 shops, financial & professional services (A1 & A2)
- up to 17,500 m2 offices (B1) / education(D1)
- up to 5,000 m2 leisure (D2)
- up to 4,000 m2 restaurants & cafés and drinking establishments (A3 & A4)
- up to 3,000 m2 hotel (C1)
- up to 1,000 m2 hot food takeaways (A5)
- 500m2 health (D1)
- provision of up to 500 car parking spaces

- revised road alignment of (part of) Lewisham High Street, Rennell Street, Molesworth Street and Loampit Vale and works to Lewisham Road.

## 2.5 Application Documents

2.5.1 The application comprises information contained in the following:

### **Drawings(for approval)**

**Site Location Plan** 13902-002/1.1

**Existing Layout** AA39175/OP-0001

### **Parameter Plans (revised)**

AA39175/OP-0002A - Proposed Layout: Ground Level

AA39175/OP-0003A - Proposed Layout: Basement

AA39175/OP-0004A - Building Blocks Plan

AA39175/OP-0005A - Public Realm Plan: Ground Level

AA39175/OP-0006A - Open Space Plan: Roof Levels

AA39175/OP-0007A - Vehicular Circulation/Public Transport Plan

AA39175/OP-0008A - Building Heights Plan

### **Detailed ‘Quaggy Café’ Drawings**

AA39175/PA-0001RevD - Block F AA39175/PA-0002RevA - Block F

### **Detailed Infrastructure Drawings (revised)**

13902/200/10/01RevP9 - Highway General Arrangement

13902/200/10/02RevP3 - Highway Cross Sections (Sheet 1 of 2)

13902/200/10/03RevP3 - Highway Cross Sections (Sheet 2 of 2)

13902/200/10/04RevP3 - Highway Long Sections (Sheet 1 of 2)

13902/200/10/05RevP3 - Highway Long Sections (Sheet 2 of 2)

### **Detailed Rivers Drawings (revised)**

13902/400/006 RevP1 - River Ravensbourne and River Quaggy Channel Long Sections

13902/270/001 Rev P5 - River Ravensbourne & Quaggy Confluence Park - Channel Long Sections & Cross Sections

13902/270/002 Rev P4 - River Ravensbourne Closed Culvert Section – Sections and Details

13902/270/003 Rev P5 - River Ravensbourne & Quaggy Confluence Park – Open Channels Plan & Cross Sections

13902/270/004 Rev P5 - River Quaggy (Confluence Park) Plan and Long Sections Sheet 1 of 2

13902/270/005 Rev P5 - River Quaggy/Confluence Park In Channel Improvements Sheet 2 of 2

13902/270/008 Rev P2 - Rivers Quaggy and Ravensbourne Planting Strategy

### **Application Documents**

- Application Form, Certificates, Schedules
- Environmental Statement and Addendum
- Environmental Statement Figures and Appendices
- Environmental Statement Non-Technical Summary and Update

- Transport Assessment and Supplementary
- Planning Statement
- Statement of Community Involvement
- Development Specification
- Sustainability Strategy
- Outline Planning Energy Statement
- Design Strategy
- Design Guidelines
- Verified View Montages and Artist's Impressions

**2.5.2** An Environmental Statement (ES) comprising a Non-Technical Summary, Main Text and Technical Appendices was submitted with the application and further information in relation to the ES submitted in July 2007. The original ES and further information has been consulted upon and assessed by the Council in determining this application. This assessment and the conclusions reached regarding the environmental effects of the proposed development and mitigation measures are set out in Section 7 of this report. The environmental impact assessment undertaken for the application is based on a number of development parameters which are set out in the Development Specification document and which establishes a number of 'fixes' for the scheme such as maximum building heights and building footprints. It prescribes a maximum scheme that has been assessed as well as an 'optimum' scheme – described as the floorspace the applicants intend to develop – and a 'minimum' scheme.

**2.5.3** The application also comprises a number of documents which explain aspects of the proposals such as the overall development strategy, approach to design and landscaping and sustainability issues. In addition images to show how the development might look when built have been submitted. Whilst these images are illustrative (i.e. they do not represent what the completed development will definitely look like) they are a useful guide to the scale of development proposed and have informed the assessment of the application.

## **2.6 Scope of the Application**

**2.6.1** The planning application is part outline and part detailed and the Council is being asked to grant planning permission:

In outline (i.e. the broad principles of the development) for the:

- mix and quantum of floorspace to be provided on the site
- maximum number of parking spaces (to be provided at basement level)
- location of blocks and maximum height of development across the site within each block
- extent of open space (hard and soft landscaped)

In detail (i.e. specific and detailed proposals) for the:

- road layout including junctions, pedestrian crossings and bus lanes/stops
- site access/egress including to basement parking area and ground level service area
- works to River Ravensbourne and River Quaggy

- building east of Lewisham High Street (Block F – ‘Quaggy Café’)
- bus layover on Thurston Road

**2.6.2** As already noted, the application documents include a Development Specification document which incorporates a series of parameter plans (revised in July 2007) which establishes a number of parameters for the scheme and fixes in terms of maximum dimensions such as building location and footprints, heights and extent of open space which represent ‘fixes’ on the proposed development for the purposes of the environmental impact assessment. Other than for the proposed building to the east of Lewisham High Street (Building F) the detailed layout and design of the buildings (including materials, hard and soft landscaping etc.) will be addressed through the Design Framework document and submission of reserved matters applications should outline planning permission be granted.

### **3. LEWISHAM GATEWAY**

#### **3.1 Urban Renaissance Lewisham**

**3.1.1** The regeneration of Lewisham town centre underpinned a bid for SRB funding in 1999-2000 which acknowledged that Lewisham “suffers from poor interchange facilities, a hostile environment and peripheral underused sites and building. The bid proposes a bold and ambitious solution to this significant problem....a landmark new interchange ... an improved urban landscape and significant sites created by the realignment of the road junction will attract new investment to enhance the retail, commercial and residential offer of this strategic location”. The submission stated that the “primary focus of the bid programme is the re-design and the redevelopment of the transport interchange site. The key aims are to improve pedestrian transfer efficiency between transport nodes and the town centre, release land for commercial development and improve the environment for residents and town centre users”. The SRB bid document included diagrams showing the existing road layout and options for its reconfiguration including a version of a ‘Low H’ scheme (see 3.14 below).

**3.1.2** The SRB bid was successful and Urban Renaissance Lewisham a regeneration partnership led by Lewisham Council was launched in 2001 and overseen by a Board initially made up of representatives from Transport for London, Citibank, Oxenburghs Ltd, Quaggy Waterways Action Group, Community Forum, Lewisham Bio-Diversity Partnership, London & Quadrant Housing Trust, Transport for London (Street Management), Environment Agency, Sundermead Residents and Tenants Association, Transport for London (London Bus Services), Sustrans, Lewisham Primary Care Trust, Slough Estates and the Metropolitan Police Service.

**3.1.3** Following the award of the bid a consultation strategy for publicising and seeking views on the redevelopment options was prepared, itself consulted upon and finally approved by the SRB Board June 2002. The consultation was managed by external consultants and reviewed with key stakeholders and a range of community groups prior to the launch. The consultation strategy laid out four stages:

- creation of an initial framework
- examination of development scenarios and evaluation
- developer selection



- planning application and legal agreement

3.1.4 The road alignment and development options on which consultation was undertaken in June 2002 were:

- retain the existing roundabout
- create a signalled crossing
- create a “Low H” layout – remove roundabout and create a new road layout with development space in the central area thus released.

3.1.5 Consultations on layout options included detailed consultations with stakeholders, 3 exhibitions, 17 public workshops, telephone survey with 1,600 residents, a survey of 500 commuters and meetings with several dozen stakeholders around the town centre. Attendees at the public exhibitions were asked to express a preference between the options with the majority favouring the ‘Low H’ option and ‘comprehensive change’. Progress reports on consultation were made to the SRB Board on 25 July and 12 September 2002. Publication of the three layout/development options was incorporated in the URL Newsletter of September 2002. The findings of the consultation exercise were reported to SRB Board in October 2002 which was also presented with an assessment of each option against four criteria: movement and environment, well being and business, investment (each of which mirrored the SRB bid), plus programming implications.

3.1.6 The report to the Board noted the strong support overall for the principle of the ‘Low H’ option for redevelopment and also that the environment emerged as a key concern for consultees with a desire for more accessible space in which to move about and enjoy the town centre and its rivers. The ‘Low H’ layout was agreed by the SRB Board as the preferred option and was incorporated into the Planning Brief. The Brief was reported to and agreed by the SRB Board in December 2002, LB Lewisham Strategic Planning Committee also in December 2002 and Mayor & Cabinet in July 2003.

## 3.2 **Developer Selection and Pre-Application Consultation**

3.2.1 The process of selecting a development partner to deliver the Gateway scheme was undertaken on the basis of the Planning Brief and aspirations identified from the consultation exercises which were incorporated in the Invitation to Negotiate issued to interested parties. Publication of the Expression of Interest brochure with the Planning Brief and accompanying technical information took place in July 2003 with Expressions of Interest due by September 2003. Eight compliant expressions of interest were submitted and of these four were short-listed. Following a thorough evaluation of the submissions by a technical panel the Amec/Taylor Woodrow consortium was selected and appointed in July 2004. Following this, work commenced on preparing the planning application that was submitted in April 2006 and is now before the Committee for determination.

## 4. **APPLICATION, SITE AND SURROUNDINGS**

### 4.1 **Site Description**

4.1.1 The application site is approximately 5.6 hectares extending principally from Rennell Street in the south to the Lewisham-Blackheath railway line in the

north, and bounded to the west by the Lewisham-Ladywell railway line and to the east by Lewisham High Street east of the River Quaggy. The application site also includes land to the south of Rennell Street (along Lewisham High Street as far as the Clock Tower and along Molesworth Street) as well as north and west of the railway lines (along Lewisham Road/Lewisham Hill and Loampit Vale/Thurston Road) to encompass the full extent of highway works, plus land on Thurston Road to accommodate a relocated bus layover facility. The application site includes the DLR station (though no works are proposed to it) but excludes the mainline railway station.

- 4.1.2** The site is currently dominated by the roundabout at the junction of Lewisham High Street, Molesworth Street and Loampit Vale and the bus layover facility in front of the mainline rail station access road and DLR station. The site includes a selection of Victorian buildings between Rennell Street and the roundabout and pub north of the existing station access road.
- 4.1.3** Immediately south of the application site is the Riverdale shopping centre and service access to commercial properties fronting Lewisham High Street. The Citibank building (approx. 72m/22 storeys in height) is located opposite the south west corner of the proposed Gateway development. To the east is a terrace of five storey late-Georgian properties (predominantly in commercial use but including residential), the Grade II listed St Stephen's church and Police Station. Further east are residential streets leading through to Belmont Hill. To the north of the site are residential properties on Silk Mills Path and beyond that Tesco and its car park. To the west of the railway is the recently completed Cornmill Gardens and Sundermead housing estate.
- 4.1.4** The application site includes the confluence of the Ravensbourne and Quaggy rivers which also flow from south to north through the site on the western and eastern edge of the site respectively. There are two areas of accessible public open space in addition to the footpaths and roads. Land to the south west of the roundabout (bounded by Loampit Vale, Molesworth Street and the railway line) – Charlottenburg Gardens – is designated as Metropolitan Open Land and links under the railway to the recently completed Cornmill Gardens. Quaggy Gardens to the east of the roundabout is a semi-enclosed and more formal space with planting and seating adjacent to the River Quaggy.
- 4.1.5** Rennell Street is a no-through road providing service access to commercial properties on Lewisham High Street, access to a 50 space car park (including 4 spaces for disabled and a Dial-a-ride drop off/pick up bay) and pedestrian access to the Riverdale Centre and Molesworth Street. The Thurston Road site was originally laid out as a site for travellers with 17 pitches of which 7 are currently occupied.
- 4.1.6** There are no listed buildings within the application site and the main development site is not within a Conservation Area although a small part of the site extends into the St. Stephen's Conservation Area to the east. The listed St Stephen's church is located beyond the site boundary but within the Conservation Area. The site is also visible, at a distance and to varying degrees from other conservation areas principally from Belmont, and Blackheath and Brockley which are in a more elevated position. None of the trees within the site are covered by a Tree Preservation Order however there are a number of mature trees around the perimeter of the site

particularly adjacent to the Quaggy River (which by virtue of their location within the St Stephen's Conservation Area are protected) and along the boundary with the railway line and younger street trees planted along Loampit Vale, Molesworth Street, Rennell Street, Lewisham High Street and around Quaggy Gardens.

4.1.7 Existing buildings on the site amount to approximately 4,300m<sup>2</sup> comprising commercial and retail space, pub and residential (14 units).

## 4.2 Planning History

4.2.1 There are currently no extant planning permissions for development of relevance within the current application site boundary nor undetermined planning applications.

## 4.3 Current Application

4.3.1 The application is for the complete redevelopment of the site with all existing buildings demolished. The proposals are founded on the development principles set out in the Lewisham Gateway Planning Brief published in 2002 which has been refined and developed in a masterplan by Arup and which formed the basis of the LGDL bid to be the developer of the Gateway site.

4.3.2 The application comprises three main elements.

- highway infrastructure works principally associated with removing the existing roundabout and realigning the A20 through the site to form the 'Low H' layout and including works to the Ravensbourne and Quaggy rivers;
- the newly created development site (bounded by two 'arms' of the Low H road layout) between a realigned Rennell Street and the railway line to the north;
- the new bus-layover site on Thurston Road

4.3.3 The highway infrastructure works comprise removal of the roundabout and its replacement by a (two-way) road system (other than at the northern edge of the site where a one-way road for buses and taxis is provided) with traffic light controlled junctions around the perimeter of the development core. The routing of vehicles is described in more detail in Section 8 of this report which considers the Transport Assessment submitted with the application. Bus stops are re-positioned around the development core (with the major provision being on Molesworth Street) with the objective of rationalising and grouping particular service routes together so as to increase ease and simplicity of use. The bus layover facility to accommodate buses that are not in service – currently north of the existing roundabout – is to be relocated onto a site on Thurston Road. This will include a building for staff (canteen, rest room etc.) of up to 200m<sup>2</sup>. A taxi rank and facilities for disabled persons is provided on the road to the north of the development site (adjacent to the railway line) and the existing taxi service at the mainline station forecourt will remain in service. However it is proposed that private car drop off will be moved to a location on Loampit Vale (westbound).

4.3.4 The works to the Ravensbourne and Quaggy rivers involve a combination of culverting and de-culverting in order to accommodate the new road layout but also remove the rivers from their existing concrete channels and create

a new space at the confluence of the rivers. The Quaggy is to be moved south to allow for the confluence of the two rivers in a new area of open space towards the centre of the site and away from the railway. The infrastructure (highway and river) works are submitted for approval in detail.

- 4.3.5 The development site is divided into six main blocks (plus a site at the northern end of the Quaggy on the eastern side of Lewisham High Street) with a principal pedestrian access route running more or less north-south from the railway station to Rennell Street. Within the site two main public spaces are created, one at the confluence of the Ravensbourne and Quaggy rivers (and a linked space immediately to the south of the DLR station) and another opposite St Stephen's church (which is located outside the application site on the eastern side of Lewisham High Street beyond the Quaggy). Pedestrian routes through and around the site provide access to bus stops and to the wider area. The application proposes a mix of uses across the site with the intention of retail units fronting onto the main north-south route through the site, restaurants and cafes focussed around the new open space, and with leisure and other office uses above the shops. The upper floors would generally be for residential use.
- 4.3.6 The building blocks vary in height as does the maximum height of blocks across the site. Three taller buildings (from 54m up to a maximum of 77m in height – approximately 18-22 storeys) are located at the north-west, north-east and south-west corners of the main development site. A mid-zone of development (34m up to 47m – approximately 10-16 storeys) is located along the western and northern edges of the site and in two blocks running perpendicular to Lewisham High Street. A third zone (14m to 28m – approximately ground plus 3-7 storeys) provides the lower part of the blocks and defines the pedestrian routes. The main part of the building on the east side of Lewisham High Street is 9m in height (3 storeys).
- 4.3.7 The application proposes development of **up to** 100,000m<sup>2</sup> of floorspace comprising:
- Residential (C3) 57,000m<sup>2</sup> – approximately 800 dwellings of which a proportion would be affordable (shared-ownership) units
  - Offices (B1) / Education (D1) 17,500m<sup>2</sup>
  - Shops and Financial and Professional Services (A1, A2) 12,000m<sup>2</sup>
  - Restaurants and Cafés and Drinking Establishments (A3, A4) 4,000m<sup>2</sup>
  - Hot Food Takeaways (A5) 1,000m<sup>2</sup>
  - Leisure (D2) 5,000m<sup>2</sup>
  - Hotel (C1) 3,000m<sup>2</sup>
  - Health (D1) 500m<sup>2</sup>
  - up to 500 parking spaces (residential)
- 4.3.8 The application does not provide a detailed breakdown of the location, size or number of units of the different uses across the site although the Design Strategy submitted with the application indicates their likely location.
- 4.3.9 Given the scale and complexity of the development it will be built out over a number of years in three principal phases: road infrastructure and river works; the two northern blocks; the southern blocks. The ES assumes build out over a five to six year period with an initial infrastructure phase of approximately 18 months which will establish the new road network, Thurston Road bus layover facility, river and services diversions. This is followed by the main building works which are expected to commence

immediately on completion of the infrastructure works. It is expected that the two northern blocks adjacent to the DLR/railway and Confluence Place will be the first phase of buildings followed by excavation of the basement areas. Buildings south of the new open space and St Stephens Square will form the next phase of development. The infrastructure works phasing plans in the ES indicate that much of the new road layout can be constructed off-line on land currently used for other purposes. This will allow, as far as possible, disruption and diversions of the main road network to be minimised during this crucial phase of works.

#### **4.4 Environmental Impact Assessment**

**4.4.1** The application is an urban development project with a development area of more than 0.5 hectare. It thus falls within paragraph 10 of Schedule 2 to the Town and Country Planning (Environmental Impact Assessment) Regulations 1999 (EIA Regulations). As the project is likely to have significant effects on the environment it is required to be subject to environmental impact assessment. Regulation 3 of the EIA Regulations precludes the grant of planning permission unless prior to doing so, the Council has taken the 'environmental information' into consideration. The environmental information means the environmental statement, including any further information and any other information, any representations made by any consultation bodies and any representations made by any other person about the environmental effects of the development. The ES is considered in Section 7 of this report and responses to consultations and other representations are also referred to elsewhere in this report.

**4.4.2** The Development Specification document (including parameter plans) defines the scope of the application for the purposes of assessment under the Town & Country planning (Environmental Impact Assessment) (England & Wales) Regulations 1999 and which is presented in an Environmental Statement (ES) that accompanies the application. The ES addresses the following areas of impact (in the order they appear in the document):

- Socio-economic
- Transport and Access (covered in detail in a separate Transport Assessment)
- Air Quality
- Noise and Vibration
- Water Resources and Flood Risk
- Archaeological Resources and Cultural Heritage
- Ecology and Nature Conservation
- Townscape and Visual
- Wind
- Daylight and Sunlight Availability
- Land Quality
- Other Issues
- Impact Interaction, Cumulative Effects and Environmental Response

**4.4.3** As an outline application (other than highway, river infrastructure and café which are submitted in detail) for the purposes of the assessment of environmental impacts and to comply with the relevant EIA Regulations the applicant has prescribed aspects of the scope and form of the proposed development such as the location of buildings and open space and maximum building heights. Should the scheme be approved these parameters will be fixed and if the applicant brings forward proposals which

alter the range of impacts identified and assessed in the ES and further Information on which this current application has been determined they may need to be reassessed and/or a new application submitted.

- 4.4.4 As well as undertaking its own appraisal of the ES the Council appointed consultants to provide an independent audit of the ES and Technical Appendices. This review, first conducted in June/July 2006, identified a number of limitations in the submitted ES and concluded that it did not demonstrate compliance with the minimum requirements under the relevant Regulations. Further information and additional assessment work to enable the Council to determine the application was identified and the applicant was formally notified by way of a Regulation 19 letter of the additional assessment work that was required. This was undertaken by the applicants and submitted in July 2007. This has been re-appraised by the Council and their consultants and it is concluded that the further information has satisfactorily addressed the issues raised in terms of methodology, the identification of impacts and mitigation measures. In addition, further assessment has been undertaken in respect of transportation, noise and air quality impacts in the light of a review of trip generation and further more detailed highway modelling work.

## 4.5 Transport Assessment

- 4.5.1 The original Transport Assessment (TA) modelled and assessed impacts based on particular assumptions about modal split, trip generation from the development, town centre parking provision and increased bus stop capacity. This was scrutinised by the Council (who appointed consultants to advise) and by TfL and a number of issues which required clarification and/or additional work were identified including modelling the highway network using a more sophisticated technique. These matters are discussed in more detail in Section 8 below.

## 5. CONSULTATION

### 5.1 Consultation Process

- 5.1.1 During the period between their appointment and the planning application being submitted LGDL held a series of meetings with LB Lewisham, GLA, Transport for London and the Environment Agency as well as with various local interest groups. Exhibitions have also been held including at URL Open Days. Details of these meetings – which were in addition to consultation undertaken by the Council following receipt of the application – are contained in Appendix F of the Statement of Community Involvement submitted with the planning application. The scheme was also presented to CABE's Design Review Panel at pre-application stage by the applicant's team.
- 5.1.2 The Council commenced its statutory consultation on the planning application in May 2006. This comprised sending over 6,000 letters to local residents, businesses, and community and interest groups as well as a wide range of statutory and non-statutory consultees. A map showing the area receiving the consultation letter is included in **Appendix A1** to this report, together with the list of organisations consulted. In addition an exhibition staffed by Council Officers was held in Lewisham town centre on 14th and 15th July 2006. The application was considered by the Lewisham Design

Panel on 22nd August 2006 and a public meeting attended by about 75 invited local residents was held on 17th October 2006. Notes of the meeting have been posted on the Council's website.

**5.1.3** The further information in relation to the ES and the supplementary information submitted in July 2007 was advertised and re-consultation took place with statutory consultees and those who had responded on the original consultation exercise. The Council held a second exhibition in Lewisham town centre on 10<sup>th</sup> and 11<sup>th</sup> August 2007 providing members of the public with an opportunity to gain an understanding of the proposals for the site and view the further ES information and supplementary material that had been submitted.

## **5.2 Consultation Responses (Summary)**

**5.2.1** 152 written responses (other than acknowledgements) plus a petition signed by 323 people were received by the Council in response to the original (May 2006) consultations. A further 80 responses have been received to date in response to the consultation in July 2007 and a further petition with 237 signatures.

**5.2.2** The summary of comments set out below is intended to outline the responses received and does not provide a comprehensive reporting of the written representations that have been made on the application. Nor does the table set out the Council's consideration of the objections received which are addressed in Section 9 of this report. A more detailed summary of the consultation responses since May 2006 is included at **Appendix A2** to this report. Responses to the reconsultation in July/August 2007 are in italics.

<b>Consultee</b>	<b>Summary of Key Points Raised</b>
GLA	<ul style="list-style-type: none"> <li>The overarching strategy of reconnecting the town centre with the station, rebalancing the relationship between pedestrians and traffic in favour of the pedestrian and the imaginative proposals for the public realm are strongly welcomed. Application raises a number of fundamental issues relating to transport and the impact of the development on the TfL road network, buses and the interchange. Further highway modelling of the proposed 'low H' shape road layout is required before a judgement can be reached. The scheme will undoubtedly transform the experience of Lewisham town centre bringing significant regenerative benefits to this part of London and enhancing Lewisham town centre's role and position in the town centre network. A number of other significant areas where the application falls short of the requirements of the London Plan: need to ensure that supporting design information forms part of the outline planning permission and to secure design quality as this outline stage; need to demonstrate compliance with London Plan energy policies, particularly relating to the provision of communal heating system, combined heat and power, and renewable energy</li> </ul>

	<p>technologies; policies relating to the blue ribbon network and achieving the highest standards of sustainable design and construction in accordance with the London Plan, particularly in relation to the drainage strategy; securing employment and training benefits at this stage; addressing the noise and air quality issues raised elsewhere in this report; access issues and need to make adequate provision for children's play space and informal recreation.</p> <ul style="list-style-type: none"> <li>• <i>Substantial progress has been made in reaching resolution on a number of strategic planning issues in relation to transport, drainage, air quality and design. Agreement has been reached with TfL in relation to the overall impact of the development on both highway and public transport network although a number of other transport issues remain. Key outstanding issue relates to the energy strategy and the need to demonstrate compliance with existing and emerging London Plan energy policies, particularly in relation to decentralised energy and the provision of renewables. Further work also required on detailed matters relating to: omissions in the design guidelines (in respect of play space, sustainable design and construction &amp; noise); wider commitments to sustainability; detailed plans for improvements to the Quaggy River; and, the access issues raised in the report, including the policy requirement for 10% wheelchair accessible housing.</i></li> </ul>
LB Bromley	<ul style="list-style-type: none"> <li>• Object on grounds of overdevelopment and likely to have an adverse effect on the vitality and viability of Bromley Town Centre.</li> </ul>
LB Greenwich	<ul style="list-style-type: none"> <li>• Object on grounds of insufficient information provided in visual form, and on height, scale and bulk and detrimental to local views enjoyed from within Greenwich Borough.</li> </ul>
English Heritage	<ul style="list-style-type: none"> <li>• No objection. Application should be determined in accordance with national and local policy guidance.</li> <li>• <i>Reiterate earlier comments.</i></li> </ul>
CABE <sup>1</sup>	<ul style="list-style-type: none"> <li>• Support the removal of the roundabout and the improvement of the connections. Commend decision to distribute bus stops around the site and mix of uses welcomed. Concerned about the quality of Confluence Place. Welcomes the use of water and attempts to engage with the public with the rivers in the square. Need for commitment in terms of budget and design time and on going management of the open space. Scheme would benefit from greater differentiation in terms of mass in the height of the blocks. Massing should take into consideration issues such as daylight penetration into the public space.</li> </ul>
The Countryside Agency	<ul style="list-style-type: none"> <li>• No comment</li> </ul>
PCT	<ul style="list-style-type: none"> <li>• Calculate proposals would create health needs that would cost £4,835,000 to address. In the absence of</li> </ul>



	a clear commitment by the developer to assist in meeting this funding gap, object to the proposals.
Met Police	<ul style="list-style-type: none"> <li>• Object on the assumption that the scheme restricts and stops police access.</li> </ul>
HSE	<ul style="list-style-type: none"> <li>• No comment.</li> </ul>
Blackheath Society	<ul style="list-style-type: none"> <li>• Supportive of major scheme which will expand range of retail facilities and other town centre uses and provide a more direct link between the station and the existing centre. Principle concern is lack of convenient interchange for rail passengers arriving or being picked up by private car.</li> </ul>
Ladywell Society	<ul style="list-style-type: none"> <li>• Scheme addresses present predicament of pedestrians getting to the centre and especially from the station and DLR. Support the mix of uses which should revitalise the area. Limited use has been made of the Ravensbourne and Quaggy as a focus landscape feature for the centre. High buildings are acceptable however will be highly visible (from high ground) and will need to be of the highest quality. Low H will cause bottlenecks in a major route through the centre. Concern at effect of traffic flow on the access to the 500 space underground car park. Appears more rivers will be covered than they are at present. Concern whether infrastructure (education, health, social services, sewerage etc) will be able to cope. Scheme should not jeopardise Lewisham market.</li> <li>• <i>Scheme should not be considered in isolation from other proposed developments in the area. Parts of the application seem to be at odds with policy which would set a dangerous precedent. A decision can only be made when the Travellers have been relocated. The site is adjacent to the St. Stephens Conservation area which would be severely harmed. Object to outline nature of the application contrary to CABA/English Heritage guidelines. Concerned exact heights of buildings have not been confirmed because of the nature of the application. Concerned about views from Hilly Fields of the tall buildings. Object to the loss of open space, part of which is MOL and Confluence Place should not be seen as a 'trade off.' Object to the culverting of the river to enable the changes to the road system. Note the development may be at risk from flooding. Concerns about road layout and effect increased traffic congestion and gridlock would have on air quality. Question pedestrian safety of the route from Rennell Street into Molesworth Street and the single crossing in Rennell Street could become blocked by standing traffic.</i></li> </ul>
Lewisham Gateway Action Group [see Appendix 2 for covering letter to objection]	<ul style="list-style-type: none"> <li>• Object on grounds of: regenerative impacts unproven (additional work will either be temporary and low waged and already vacant offices); transport capacity (no analysis of the impact of the development of the remainder of Lewisham and</li> </ul>

likely to be a build up of traffic at the exits/flow of traffic likely to be very congested around the station); impact on retail economy (scheme will attract shoppers from the rest of the High Street/market and only large chains will be able to afford the rents); flooding; vehicular circulation; pedestrian experience; degradation of river environment; site unsuited for the development; outline application for tall buildings (contrary to CABA/English Heritage guidance); loss of MOL and green space; housing provision (20% affordable housing provision is inadequate given Lewisham's housing needs); noise levels; deterioration of air quality; sunlight and daylight reduction; wind turbulence; negative impact on four conservation areas and Grade II listed building; local views (impact on Brookbank Road and Ellerdale Road and will weaken the attractiveness of the area); site of archaeological importance damaged; the destruction of existing community links (no increased education provision); carbon footprint; misleading and biased consultation (only people in a small radius round the town centre consulted).

- *Traffic congestion is proven to get worse. Traffic speeds through the area of the site will decrease by 20%, causing still greater increases in tailbacks along approach roads. Models still do not take into account the other developments planned for the area - urgent that a cumulative assessment be made of all future transport needs for central Lewisham before any specific permission is granted for the proposed changes to the road layout at the Gateway site. No viable strategy exists for encouraging greater use of public transport. There are no segregated cycle paths, bus lanes peter out at various points, and no new extensions to the DLR or tramlink can now take place. Increased numbers of buses are described in the supplementary material as 'aspirational' only. There is insufficient capacity on the trains to cope with the additional 5,000 plus residents planned for the immediate area. Unrealistic and out-of-date data on rail capacity still being used in the Supplementary TA. Air quality will deteriorate as a result of the operation of the proposed road layout and data on this remains unreliable while the traffic model and the impact on traffic flows is unverified. Estimates on air quality in the 'Environmental Statement Addendum' Appendix E do not appear to take into account increased congestion along approach roads. The Low H road layout remains deeply controversial. It was adopted without properly considering the alternatives contrary to EU directives. Pedestrian routes around the site are 'pinched'. Development makes no improvements to connections between buses, DLR and rail. With the development it will take pedestrians longer to go from the stations to*

*bus stops for buses out of Lewisham and gaps between some bus stops are increased. Claimed savings of 20% in pedestrian journey times are not substantiated Routes will be crowded and air quality worse especially at some bus stops while, as a result of the high-rise development the site is 'excessively' windy in key retail and leisure areas: sunlight and daylight within the site has not been modelled at all. Rivers are not naturalised and Ravensbourne pushed completely underground for 40m. The effects of this on wildlife habitat have not been assessed in the application. A major opportunity for making the most of the confluence of the two rivers as a unique element in Lewisham's identity will be lost forever. Flooding and drainage remains a concern. Figures for surface water run-off do not appear to have taken into account the loss of 72% of the current green space which the development involves. Urge Strategic Planning Committee to refuse outline planning permission for the following reasons: outline planning application for tall buildings contrary to all existing guidelines in the London Plan by CABI/English Heritage; claims development will lead to 'regeneration' are false; affordable housing well below any guidelines and is not guaranteed; no estimate of the impact of the scheme on existing traders and the street market; all other amenities are subject to a profit being made from their provision and the whole project is financially risky; in addition to the traffic gridlock and loss of open rivers the following major negative permanent impacts will obtain: increased noise level as a result of the operation of building services plant; noise levels would put development in NECs A-D for which planning permission would normally be refused; without development annual mean limit for NO2 is likely to be exceeded in 2012 and the development will further enhance these levels by up to 4% with no mitigation measures available other than measures to encourage to sustainable modes of transport; windy conditions created by high-rise blocks in the maximum scheme means conditions in certain locations no longer be acceptable for their intended use; loss of green space and Metropolitan Open Land; likely de-watering of Palaeolithic deposits and burial ground and removal of pre-historic stone which was the foundation stone of the Lewisham medieval bridge; urbanising effects at night time likely to give rise to generally adverse effects; loss of views from all the surrounding areas; conservation areas and a listed building are overshadowed and their surroundings blighted; the form of development inhibits the use of certain types of renewable energy and the scheme fails to address the urgent need for carbon neutral development.*

<p>Quaggy Waterways Action Group (QWAG)</p>	<ul style="list-style-type: none"> <li>• Object as scheme fails to realise the potential of the rivers, removes existing potential to restore or enhance the rivers and degrades the river environment. Fails to reasonably take into consideration: consultation in 2002 which highlighted rivers and green space as the most important feature for users, priorities identified by the URL, London Plan policy, does not fulfil the Lewisham Gateway Planning Brief or UDP policies. Would like to see road system moved away from the river and object to the culverting of the Ravensbourne. Note green space along the river corridor would be removed and potential to improve the river system in the future. Concern at loss of daylight and sunlight to the river (noting that the ES does not comment on this), an increase in wind in 'Confluence Place' and degradation of landscape and amenity value of the rivers by bringing buildings and roads closer to the river. Selection of the 'Low H' layout prejudiced by not showing additional culverting of the river. Proposal would remove two thirds of current potential to restore the rivers in central Lewisham and restoration proposed would only be of 20% of the rivers which would be a loss to the area.</li> <li>• <i>Eastern part of the River Quaggy was split off from the main site and is to be the subject of a separate planning application. These applications are inextricably linked and should be considered together but the application is yet to be lodged.</i></li> </ul>
<p>Lewisham Cyclists</p>	<ul style="list-style-type: none"> <li>• Some positive aspects such as cycle parking and some re-routing of LCN's and routes but do not appear to fulfil much more than minimum expectations and proposed cycle facilities do not go far enough. Extra wide bus lanes to allow safe overtaking of cyclists by buses should be considered if they are to share the road or built cycle lanes considered at certain stretches on main roads. Rennell Street crossing should be wider to take account of cyclists. Against a complete ban on cycling within the Gateway development and shared pedestrian cycle use be made of certain low density routes through the site. Cycle parking standard should be increased to 2 per flat.</li> </ul>
<p>London Cycle Network</p>	<ul style="list-style-type: none"> <li>• Cycle lanes and cycle track should be provided between the junctions. Access to and from the transport interchange by bike should be possible without dismounting. Cycle users should be accommodated along Station Road (in both directions). High priority should be given to provision of secure cycle parking immediate to transport interchange.</li> <li>• <i>Measures from TfL study of A20 should be included as part of the planning application proposals for this section of TfL highway. No inclusion of measures required for cycle users to be able to access the</i></li> </ul>

	<i>proposed development and recommend various measures to ensure the LCN+ is catered for.</i>
Hilly Fields Park User Group	<ul style="list-style-type: none"> <li>• <i>Increased concentrations of people would put the park under greater pressure due to its proximity to the site. Concerned about views from the park which are protected in UDP policies. This would erode the sense of place and undermine amenity.</i></li> </ul>
Land Securities	<ul style="list-style-type: none"> <li>• <i>Support the development as owner of the neighbouring Shopping Centre. Consider the development of the site as a vital enhancement to the linkages between the transport interchange and town centre and therefore a positive benefit to the long term future of retail and the vitality and vibrancy of the town centre. Believe the increase in retail will serve to increase the draw of Lewisham as a shopping destination.</i></li> </ul>
LBL Building Control	<ul style="list-style-type: none"> <li>• Advises applicant to consult the fire service. Advice on storage of solid waste</li> </ul>
LBL Environmental Health (Contamination)	<ul style="list-style-type: none"> <li>• No objection but recommends the imposition of site contamination condition</li> </ul>
Elected Members	<ul style="list-style-type: none"> <li>• Councillor Keogh: 4 metre extra width for Quaggy will be an asset to Lewisham and should be designated as Metropolitan Open Land. should provide for brown roofs wherever possible.</li> <li>• Councillor Johnson: supports QWAG's proposal to move the road 4 metres from the Quaggy to allow river to be fully restored and to create a decent riverside environment.</li> <li>• Councillors Johnson, Michel and Phoenix: support regeneration of Lewisham Town Centre, to improve the links between the station and the town centre, to make river more accessible and a key feature of the town centre and to provide high density development given good transport links that make the site suitable for accommodating Lewisham's growing population. Making the town centre a more attractive shopping venue will encourage shoppers to shop locally, thereby reducing the number of car journeys. Welcome improvements to the bus facilities. Serious concerns about traffic modelling (to determine whether the low H shape is appropriate), support Lewisham Cyclists in objections/proposals to improve provision for cyclists, call for significant reduction in car parking, call for exemplary standards of sustainable design and construction and extremely concerned about lack of ambition and lack of detailed information on renewable energy, concerned about level of affordable housing provided and call for significant increase and improved tenure mix. Support: high density housing in principle but subject to being convinced by full daylight, shadowing and wind reports; removal of concrete channels, placing the rivers in their natural setting but share concerns of QWAG. Support London Mayors demand for provision of children's play</li> </ul>

	space. • <i>Reiterate earlier comments.</i>
--	--

<sup>1</sup> pre-application comments dated 22 February 2006 re-issued 28 June 2006

5.2.3 The letters from individual residents raise a number of matters including:

- Height and scale of buildings
- Density too high
- Buildings are ugly
- Impact on views from Hilly Fields and surrounding area
- Effect on St. Stephens Church and conservation area
- Lack of affordable housing which is not guaranteed to be delivered
- Lack of family housing
- Increased traffic congestion from low H road system
- Existing public transport does not have the capacity to take additional residents
- Assessments don't take into account other developments in the area
- Parking insufficient
- Poor air quality which would be further lowered
- Loss of MOL and open space objectionable
- Poor quality open space that would be overshadowed by tall buildings and too windy to comfortably sit in
- No need for more shops, cafes or office space, likely to become a 'clone town' with chain stores
- Vitality of existing shopping centre and market would be harmed
- Moving of rivers unacceptable in order to accommodate tall buildings
- Support QWAG's proposals for improvements to the Quaggy
- Culverting of rivers unacceptable
- Early consultation with residents highlighted importance of the environment which has not been delivered in this scheme
- Supportive of regeneration in principle but scheme is out of character with the area
- Would like to see a tramlink
- Town Centre needs a comprehensive approach rather than piecemeal development
- Consultation has been misleading, particularly relating to the scale of development
- Misleading artist's impressions
- Scheme would be irreversible if built
- People of Lewisham would not benefit from the scheme, only developers

5.2.4 Letters and petitions are available to Members.

## 6. PLANNING CONSIDERATIONS

### 6.1 Introduction

6.1.1 The current application proposes a comprehensive, high density, mixed use development of the Gateway site. Built out on a phased basis over a number of years the proposed development and infrastructure works will change significantly the layout, use, appearance and experience of the site. Based on the vision and aspirations for the town centre identified by Urban Renaissance Lewisham and set out in the Planning Brief the scheme is

aimed at making a major contribution to the regeneration and transformation of Lewisham as a retail centre and transport interchange, with benefits beyond the immediate site area.

6.1.2 The application comprises a number of different elements with a mix of uses, areas of open space, new public transport interchange facilities, new pedestrian routes and links to the existing town centre, improvements to the environment and setting of the rivers, and the provision of new homes including affordable housing. Clearly such a significant change raises a large number of planning considerations and the application has also generated a significant amount of interest and objection. The planning considerations are set out and examined in the following section of this report.

## 6.2 Policy Context

6.2.1 The policy framework for this application is set out in a number of documents:

- **Planning Policy Guidance** - in particular PPS1: Delivering Sustainable Communities; PPS3: Housing; PPG4: Industrial, Commercial Development and Small Firms; PPS6 Planning for Town Centres; and PPG13: Transport. In addition there is guidance in other PPGs and PPSs that is of relevance in considering the application, principally those relating to Nature Conservation (PPG9), Planning and Waste Management (PPG10), Planning and the Historic Environment (PPG15), Archaeology and Planning (PPG16), Renewable Energy (PPS22), Planning and Pollution Control (PPS23), Planning and Noise (PPG24), and Development and Flood Risk (PPS25).
- **The London Plan** (February 2004 and Alterations December 2006), and associated Supplementary Planning Guidance including Housing, Draft Further Alterations are currently in progress which include the Mayor's Energy Strategy and supplemental policy statements and the Mayor's 100 Public Spaces programme.
- **Lewisham UDP** (Adopted July 2004)

6.2.2 In addition there is **non-statutory guidance** of relevance to this case such as the English Heritage/CABE Guidance on Tall Buildings (July 2007).

6.2.3 Under Section 70(2) of the Town and Country Planning Act 1990, in dealing with any planning application the planning authority must have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations. Pursuant to Section 38(6) of the Planning and Compulsory Purchase Act 2004, where regard is to be had to the development plan for the purposes of any determination, then the determination must be made in accordance with the plan unless material considerations indicate otherwise. The statutory development plan is Lewisham's UDP Adopted July 2004 (hereafter referred to as the UDP) and the London Plan February 2004 and Alterations (referred to jointly hereafter as the London Plan) which the UDP is in general conformity with.

6.2.4 Given the scale and scope of the application the proposals touch on most areas of the UDP and London Plan to a greater or lesser extent – urban design and conservation, open space, environmental protection, housing, sustainable transport and parking, shopping and town centres, and leisure, community facilities and education. The UDP includes two site-specific

Proposals for parts of the Gateway site and policies of particular relevance to the determination of this application in the UDP and the London Plan are listed in **Appendix A3**.

- 6.2.5** The Lewisham Gateway Planning Brief was approved by the Council in July 2003 as Supplementary Planning Guidance to the then UDP (dated July 1996) although at that time the UDP was at an advanced stage of Review. The formulation of policies and proposals relating to Lewisham Town Centre in the current UDP pre-dated the SRB bid and also the URL consultations on options for the future of the town centre which were subsequently incorporated into the Gateway Planning Brief. Acknowledging that there were likely to be land use changes arising from SRB projects that would emerge over the lifetime of the UDP, Policy URB2 in the UDP states that the Council will support changes agreed as part of the implementation of regeneration projects in connection with SRB or successor schemes. The Planning Brief also notes that it should be read in conjunction with the (then emerging) UDP. Whilst the UDP sets out borough-wide policies relating to such matters as open space, environment, housing and transport as well as some town centre policies and site specific proposals, the Planning Brief provides more focussed guidance related to the development of the Gateway site. It is a material consideration in the determination of the application and in the circumstances outlined above and given the extent of consultation on it, it is considered that the Brief should be given considerable weight as part of the planning policy framework for determining the current application.
- 6.2.6** The UDP will be replaced by a Local Development Framework (LDF) which is currently being prepared in line with new legislation and guidance from the Government. In the interim, policies in the UDP are 'saved' until 27th September 2007 unless the Secretary of State for Communities and Local Government extends these policies beyond that date. The suite of Development Plan Documents (DPDs) that make up the LDF include the Core Strategy, Area Action Plans (AAP) and Supplementary Planning Documents (SPD). The Core Strategy has been published and the consultation period ended on 3<sup>rd</sup> August 2007. An AAP for Lewisham town centre has been prepared which identifies a number of development sites across the town centre including the Gateway site. Consultation on the Draft Lewisham Town Centre AAP commenced on 17<sup>th</sup> August 2007 and runs until 28th September 2007. Whilst the Draft Lewisham Town Centre AAP is at a relatively early stage in terms of its progress towards formal adoption it takes forward the development principles set out in the approved Planning Brief for the site and, together with policies in the Core Strategy, is a material consideration in the determination of the current application.
- 6.2.7** Inevitably, given the transition from the UDP to LDF that is required by the Government new policy documents relating directly and indirectly to the site have emerged since the submission of the planning application in April 2006. However it is considered that the combination of the London Plan, the UDP, the Planning Brief and the emerging Core Strategy and Draft AAP provide a clear planning policy framework within which to determine the Gateway application and it is not considered that determination of the application would prejudice the outcome of the development plan documents currently being progressed. Further, examination of the DPDs is at a very early stage and, it is considered that to delay determination of the current application until the DPDs are formally adopted (programmed for early-mid 2010) would result in the Council's strategy to regenerate the town



centre being severely undermined and potentially shelved on a permanent basis.

**6.2.8** The various planning policy issues such as Metropolitan Open Land and development-related impacts such as highway capacity and building heights and massing have been thoroughly assessed and it is considered that they have been satisfactorily addressed in the application and where appropriate there are measures the Council can put in place by way of condition or planning obligation to ensure that the high aspirations of the scheme are delivered. Overall Officers consider that whilst aspects of the scheme are challenging, the overall package of development represents a major opportunity that will transform the town centre. The proposals have the potential to be a significant catalyst for the wider regeneration of the area and deliver on the vision and aspirations for Lewisham town centre site as set out by the URL Board, in the approved Planning Brief and in the UDP and emerging AAP.

### **6.3 Land Use, Town Centre and Retail**

**6.3.1** The planning application proposes a mix of uses comprising up to:

- 57,000 m2 residential
- 12,000 m2 shops, financial & professional services
- 4,000 m2 restaurants & cafés and drinking establishments
- 1,000 m2 hot food takeaways
- 17,500 m2 offices/education
- 5,000 m2 leisure
- 3,000 m2 hotel
- 500m2 health

**6.3.2** The Development Specification notes that the scheme that is actually built may be a lower amount of floorspace than that applied for (potentially 78,000m2) with a different mix and proportion of uses.

<b>Use</b>	<b>Maximum</b>	<b>% of Total<sup>1</sup></b>	<b>Optimum</b>	<b>% of Total<sup>1</sup></b>
Residential	57,000	57%	51,500	66%
Office/Education	17,500	17%	10,000	13%
Retail (A1-A5)	17,000	17%	12,500	16%
Leisure	5,000	5%	3,500	4%
Hotel	3,000	3%	0	0
Health	500	.05%	500	.06%

<sup>1</sup> figures rounded

**6.3.3** What is evident from this comparison is that under the Optimum scheme there is a lower proportion of non-residential uses proposed. Whilst this would still deliver a scheme with a wide and strong (rather than token) mix of uses, in terms of ensuring that a genuinely mixed use scheme is delivered it is important that mechanisms are in place that put the onus on the applicant to justify any variance from the intended land use mix that is being applied for. To this end, through discussion with the Council the applicant has set out a mechanism (referred to in the Development Specification document as a 'Phasing Reconciliation Plan') for the monitoring and control of changes in the mix of uses as the development is built out. It is proposed that this process will require evidence of market demand and marketing of the buildings before non residential/non-retail uses are omitted from the scheme and will be secured through an obligation in the s.106. Whilst theoretically the 'worst case' situation would be only

residential and retail uses on the site (which would nonetheless make a significant contribution to the regeneration of the town centre), the Council's aspiration has been for a mixed-use development of the site and the mechanism that will be put in place will ensure that every effort is made to secure a mix of uses. Officers are satisfied that this is a robust approach without placing undue restrictions on the precise mix of uses that come forward within each building and across the site as a whole.

**6.3.4** In terms of the policy base for mixed-use high density development, national guidance as set out in PPS1 (Delivering Sustainable Development) is that in promoting regeneration local planning authorities should seek to promote mixed use developments for locations that allow the creation of linkages between different uses and can thereby create more vibrant places. This includes focussing developments that attract a large number of people, especially retail, leisure and office development, in existing centres to promote their vitality and viability, social inclusion and more sustainable patterns of development. Further, PPS1 states that planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges, and promote the more efficient use of land through higher density, mixed use development and the use of suitably located previously developed land and buildings. Similarly, PPG13 (Transport) states that local authorities should seek to make maximum use of the most accessible sites, such as those in town centres and others which are, or will be, close to major transport interchanges. At the strategic/London-wide level London Plan Policy 2A.5 (Town centres) states that UDP policies should seek to sustain and enhance the vitality and viability of town centres including maximising housing provision through high density, mixed use development and environmental improvement.

**6.3.5** The UDP states that Councils strategy for development and the use of land involves three main themes: to drive regeneration; to ensure that development is sustainable; and to promote equality of opportunity, in the land use planning system. More particularly in relation to town centres Policy STC1 (The Shopping Hierarchy) states that the Council will seek to "maintain and where necessary improve the function, character, vitality and viability of the established shopping hierarchy ... by sustaining and encouraging through a balance of development, regeneration and conservation a diversity of uses appropriate to their function and location and retaining and enhancing each Centre as a focus for retail activity". In terms of the mix of uses proposed, Policy URB1 of the UDP (Development Sites and Key development Sites) notes that the Council has identified the larger sites in the borough it wishes to see developed, and Schedule 1 of the UDP indicates the uses that the Council considers appropriate on these sites. There are two site specific allocations in the UDP that lie within the Gateway application site – Sites 37 and 39. Site 37 relates to Lewisham Passenger Transport Interchange site where the proposal is for "a mix of commercial and employment and residential appropriate in a town centre location. A hotel use may be appropriate. Linkages to the town centre and the appearance of the rivers running through the site to be improved." Proposal 39 relates to the Odeon site for which the proposal is for a "mix of D2 leisure use/or hotel, A1, A3 and B1 employment with improved linkages to the town centre."

**6.3.6** This is reflected in the approved Planning Brief for the site (para. 1.01) which seeks to bring forward a 'major high quality, high profile, mixed use

development incorporating retail, residential, commercial and leisure uses'. The Draft AAP also reflects the Council's aspiration that Lewisham Town Centre rise up the London retail hierarchy and become a Metropolitan Centre and identifies a number of broad objectives for the area including the provision of high quality housing in the heart of the town centre, improving the vitality and viability of the town centre as a retail location, the provision of educational, community and leisure facilities and services that are accessible to everyone. This is translated into four main themes which include developing a prosperous economy the key to which will be "planning for an appropriate mix of uses at sufficiently high density to create a critical mass of positive activity which is carefully planned to avoid conflict between uses".

- 6.3.7** The LDF Draft Core Strategy identifies the Preferred Option for Growth for the borough as a whole as promoting major growth in the most sustainable areas such as Lewisham town centre and maximising the scarce land resource by promoting mixed use redevelopment in suitable locations. The Draft Core Strategy identifies a major growth corridor focussed on Catford, Lewisham and North Lewisham which are considered optimal locations for encouraging active change through significant regeneration and intensification of built development which will involve substantial new housing, increased employment uses, mixed use development, retail and town centre uses, and the necessary social, economic and transport infrastructure required to support the existing and new communities. Given the significant change that will occur in Lewisham town centre an AAP has been prepared within which the Gateway site is located. The Draft AAP sets out a comprehensive policy framework and site allocations for the town centre area as a whole to deliver a significant increase in retail capacity, substantial new residential development, an increase in other town centre employment uses and new cultural and leisure facilities provision. In the Draft AAP Lewisham Gateway is identified as one of six 'Opportunity Areas' which present significant opportunities to enhance the vitality and viability of Lewisham town centre and which could deliver new retail floorspace, homes and jobs as well as contributing to sustainable patterns of transport and creating a first class environment. Policy LTC OPP1 in the Draft AAP sets out a number of principles that development should be in conformity with as well as identifying what is considered to be the development capacity of the site in terms of retail, residential, leisure, office and hotel floorspace. LTC OPP1a (General Principles for Lewisham Gateway) states that the Council strongly supports the principles behind the Lewisham Gateway initiative of radical improvements in linkage between the primary shopping area and the Lewisham public transport interchange through the 'low-H' junction arrangements, and identifies a number of issues that will be taken into account when assessing an application for the Gateway site.
- 6.3.8** In the circumstances, although covering an area beyond the two Development Sites identified in the UDP it is considered that the mix of uses and overall development strategy set out in the current Gateway application is in broad conformity with the site allocations in the UDP and with Policies URB1, URB2 and STC1 as well as the strategy set out in the emerging AAP and in the approved Planning Brief for the site.
- 6.3.9** In terms of the retail floorspace proposed, the application seeks permission for up to a total of 17,000m<sup>2</sup> of floorspace comprising up to 12,000m<sup>2</sup> of shops and financial/professional services (Use Class A1 and A2), up to 4,000m<sup>2</sup> of restaurants/cafés and drinking establishments (A3 and A4) and

up to 1,000m<sup>2</sup> of hot food takeaways (A5). Lewisham town centre is the borough's main shopping centre and though currently designated as a Major Centre within the borough the UDP (STR.STC1-3, STC1) notes that the Council considers it has the potential to rise up the London retail hierarchy and become a Metropolitan Centre, and which will require qualitative and quantitative retail improvements. Further the policies note that the Council will take action to help realise this potential. The Draft Further Alterations to the London Plan (September 2006) note (para 5.126) that new retail development will support existing initiatives to regenerate centres like Lewisham.

- 6.3.10** The Council's land use strategy for shopping and town centres as set out in the Policy STC1 of the UDP is to support the existing hierarchy of provision but aim to improve the strategic role and function of Lewisham Town Centre; locate major new retail and leisure facilities within the existing Major (and District) Town Centres; and promote the vitality and viability of the Major and District Town Centres by protecting a core of retail uses, encouraging diversity including the evening economy, improving the environment and implementing regeneration strategies. Further, the Council intends to regenerate the Major (and District) Town Centres by strengthening their retail function, encouraging a diversification of appropriate uses and facilitating visual and environmental improvements. The evening economy will be encouraged in the Major Town Centres to enhance their vitality and viability outside of office hours.
- 6.3.11** In this context the quantum and range of proposed retail uses are considered to be consistent with policies in the UDP. Based on guidance in PPS6 (para 3.20), given the location of the site and nature of the retail provision in the application a retail impact assessment is not required. The Council's approach to retailing in Lewisham town centre and the borough generally has been informed by a study of retail capacity. Undertaken in 2004, the study included a household survey which showed that over half (57%) of the comparison goods expenditure available in the borough was spent outside the borough.
- 6.3.12** The study also looked at the likely growth in expenditure on comparison and convenience goods over the period 2006-2016 and converted this into potential floorspace growth. The results were that there is a potential gross comparison floorspace need in the borough of 12,859m<sup>2</sup> in 2006; rising to 35,210m<sup>2</sup> in 2011 and further growing to 63,126m<sup>2</sup> by 2016. In calculating the floorspace needs of the borough the study took account of existing commitments and made an allowance for the reuse of existing vacant floorspace and the potential installation of mezzanine floorspace. The study then looked at suitable sites that might be developed to accommodate this floorspace including the Gateway site where an allowance of 10-15,000m<sup>2</sup> was made. Having taken account of the various ways of accommodating the growth the study still found at 2011 there was a total gross retail floorspace requirement of up to 26,596m<sup>2</sup>, even allowing for sites such as Lewisham Gateway.
- 6.3.13** This conclusion is supported by the owners of the Riverdale Centre who have advised the Council that in their opinion the development of the Gateway site is a vital enhancement to the linkages between the transport interchange and the town centre and a positive benefit to the long term future of not only the retail offer in Lewisham but to the vitality and vibrancy of the town centre. Further, they consider that an expansion of the critical

mass of complimentary retail will serve to increase the draw of Lewisham as a shopping centre within its catchment. In the circumstances it is considered that there is a clear need for the retail floorspace proposed which will make a major contribution to the future of Lewisham town centre. On a detailed point, to support the strategy of increasing comparison shopping in the town centre it is proposed that a condition be imposed limiting the maximum amount of A2 uses in this application in order to ensure that 'high street' shops rather than professional services are the predominant use. Subject to these measures the impact is considered acceptable.

**6.3.14** In terms of the provision of non-retail uses in the town centre there is the potential within the Leisure D2 Use Class floorspace for a cinema subject to operator demand. Such a use is considered consistent with the objectives of the Planning Brief and with UDP Policy STC3 which considers such a use acceptable in Major town centres such as Lewisham subject to a) no adverse impact on the vitality or viability of the town centre, b) re-provision of A1 uses where these are displaced from core retail frontages and c) adequate car parking. As part of a mixed use development providing new and additional retail floorspace it is considered that the inclusion of such a use will enhance the town centre offer and will not displace existing retail uses. In terms of car parking provision the application does not propose any parking for the cinema or other non-residential uses within the development. However given the proximity of the site to a number of bus routes and the mainline rail and DLR stations, as well as the likely main use being outside peak travel and shopping times, it is considered that there is adequate public transport provision and parking in town centre car parks to avoid this creating a significant adverse impact locally. Unless controlled by condition/agreement, the space envisaged for cinema use could be used for other purposes such as a health club/gym, concert hall, bingo, and dance hall and it is considered appropriate to control the range of possible uses by way of condition.

**6.3.15** Other non-retail uses applied for include education space which could be occupied by Lewisham College as part of the reorganisation and rationalisation of their space. Whilst it is understood that no decision has been made by the College about taking space in the Gateway development this application provides the opportunity for such a move. If the College does not take this space then another educational establishment could occupy the space or alternatively under the terms of the application it could be used as offices. Such a use would be consistent with Policy EMP6 of the UDP which identifies Town Centres as the preferred location for office for new office developments. The application also includes up to 3,000m<sup>2</sup> for a hotel. Such a use would be consistent with Policy STC16 of the UDP which states that the Council would welcome and give favourable consideration to planning applications for new hotels within the Town Centre.

**6.3.16** In conclusion it is considered that the mix of uses proposed is consistent with and supports implementation of policies set out in national and strategic policy, the UDP and Planning Brief. The proposals are also consistent with the objectives and policies in the emerging Area Action Plan for Lewisham town centre. Overall it is considered that the increased retail floorspace and associated uses has the potential to significantly increase footfall and trade across the town centre as a whole and make a significant and positive contribution to the vitality and viability of Lewisham town centre, contributing

to a move towards a centre of Metropolitan status in the London retail centre hierarchy.

## **6.4 Metropolitan Open Land**

- 6.4.1** As part of the realignment of the road network and creation of the main Gateway development site the application proposes the reconfiguration and re-provision of open space within the application site boundary. This will involve a loss of land designated in the UDP as Metropolitan Open Land (MOL) – known as Charlottenburg Gardens. This space links with a larger area of MOL along the Ravensbourne to the west of the railway line which is part of a north-south chain of MOL running through the borough along the course of the Pool and Ravensbourne rivers and which includes Ladywell Fields to the south and Brookmill Gardens to the north. Demolition of houses that formed part of the Sundermead Estate and their replacement with open space and associated extensive landscaping works to create Cornmill Gardens has created additional contiguous accessible open space in this area. Quaggy Gardens which is also within the application site is designated as Public Open Space in the UDP.
- 6.4.2** The MOL within the application site is an area of grass adjacent to the railway line to Ladywell, bounded by the railway embankment, Loampit Vale and Molesworth Street. It is enclosed by a low open fence and limited screening by street trees onto Molesworth Street. It is also bisected by the Ravensbourne River (which is in an inaccessible concrete channel at this point) which further reduces its utility as public open space. As a consequence it is a fairly hostile environment and not conducive to use for sitting out. Nonetheless as MOL it is protected and a ‘special circumstances’ case must be made for its loss which, within the application site, amounts to some 2,460m<sup>2</sup>.
- 6.4.3** The main criteria for designation of MOL are that it is land which contributes to the physical structure of London by being clearly distinguishable from the built up area; which includes open air facilities, especially for sport and leisure, arts and cultural activities or tourism which serve the whole or a large part of London; or which contains landscape or features of historic, recreational, nature conservation or habitat interest of value at metropolitan or national level.
- 6.4.4** Policy 3D.9 of the London Plan provides for the protection of MOL and states that the boundary of MOL should only be altered in exceptional circumstances and should be undertaken through the development plan process. Under the London Plan, MOL is stated to serve a similar purpose to the Green Belt and is to be afforded the same protection. Development which involves the loss of MOL in return for its replacement with new open space elsewhere is not acceptable. Policy OS1 in the UDP provides for the open character of the MOL to be preserved and states that planning permission will only be granted for ‘appropriate development’ where this preserves the open nature of the land. Appropriate uses may include public and private open space, playing fields, golf courses, agriculture, woodlands, orchards, rivers, canals, reservoirs, lakes allotments, nursery gardens, cemeteries/crematoria and nature conservation. The UDP also recognises that by analogy with national policy on Green Belt. Development involving loss of MOL will only be acceptable in special circumstances.

- 6.4.5 Given that MOL is the same as the Green Belt in terms of protection from development, PPG2 (Green Belts) is also of particular relevance. This states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the most important attribute of Green Belts being their openness. There is a general presumption against inappropriate development within Green Belts and such development is, by definition, harmful and should not be approved, except in very special circumstances. Very special circumstances to justify inappropriate development will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.
- 6.4.6 Clearly the proposed development, which replaces most of the area of MOL to the east of the railway line with highway infrastructure, is neither 'appropriate development' within the terms of the policy, nor preserves its open nature. The London Plan makes clear (in supporting text to Policy 3D.9) that development that involves the loss of MOL in return for the creation of new open space elsewhere will not be considered appropriate. The London Plan also notes that the boundary of MOL should only be altered in exceptional circumstances (and should be undertaken through the UDP process in consultation with the Mayor). As such 'very special circumstances' need to exist to allow a departure from policy on this matter and the test is whether harm by reason of inappropriateness and any other harm is outweighed by other considerations. In this regard, it is considered that the overall regeneration benefits of the scheme in terms of delivering the town centre vision set out in the approved Planning Brief of new shops and homes, a mix of other town centre-related uses and improved public transport interchange and pedestrian connections with the town centre are of relevance as are the wider environmental improvements to the quality and amenity value of the open space within the site. If the land were retained as MOL then the 'Low H' road layout would not be achievable and therefore one of the underlying principles and structuring elements of the Gateway Planning Brief could not be delivered with a consequential shelving of the current scheme. Accordingly, it is considered that the delivery of the Gateway scheme and the regenerative benefits it will deliver constitute very special circumstances which would allow the loss of MOL within the application site.
- 6.4.7 Policy OS2 in the UDP relates to development fringing, abutting or having a visual relationship with MOL on the basis of their detrimental impact on visual amenity, character or use of the MOL and is also of relevance in the consideration of the development proposals in as much as part of the existing MOL to the east of the railway line will be retained. It is considered that for the reasons outlined above relating to the loss of MOL that any adverse impacts are outweighed by the very special circumstances arising in this case.
- 6.4.8 Consideration of other open space within the application site is in Section 6.8 of this report.

## 6.5 **Scale, Density, Massing and Design**

- 6.5.1 The planning application (other than the site access, highway and river infrastructure works, building east of Lewisham High Street and bus layover facility on Thurston Road) is in outline, proposing a high density development including tall buildings. Whilst the Development Specification

document sets out parameters for the scheme such as building heights and footprints there is no specific detail on the design of buildings. Policy 4B.9 in the London Plan (Large-scale buildings – design and impact) states that all large-scale buildings including tall buildings should be of the highest quality design and sets out a number of considerations. These relate to such matters as their relationship to other buildings, streets, public and private open spaces and waterways; their impact on the skyline; the use of sustainable construction and potential for renewable energy generation and recycling; their impact on micro-climates; consideration of transport capacity of the area and ensuring adequate, attractive, inclusive and safe pedestrian and public transport access; and provide high quality spaces that capitalise on opportunities to integrate green spaces and planting and support vibrant communities both around and within the building.

**6.5.2** These objectives have informed the assessment of the current application as well as guidance on tall buildings prepared by CABE and English Heritage (July 2007) which states that outline planning applications for tall building proposals are appropriate only in exceptional cases where the applicant is seeking to establish the principle of a tall building as an important element within a robust and credible masterplan for an area to be developed over a long period of time. In those cases, CABE and English Heritage must be satisfied that the parameters for any tall building set out in an outline planning application and the principles established within the accompanying design and access statement will result in excellent urban design and architecture. In addition it is essential that the planning authority makes these parameters and design principles a condition of outline consent to ensure that the commitment to high quality can be realised through proactive control of reserved matters.

**6.5.3** Lewisham Town Centre is identified in the UDP (Policy URB5) as a location where high buildings may be permitted and will require a development brief to identify sites as suitable. The Gateway Planning Brief refers (para. 2.15) to development that presents a dramatic built form that rises from the relative low storey heights along the High Street to a series of dynamic and tall architectural statements around the station. Figure 2.3 in the Planning Brief illustrates the opportunity for and possible urban form of 'landmark buildings of strategic visual significance'. In the Draft AAP, Policy LTC URB1 (Tall Buildings in Lewisham Town Centre) states that planning applications for tall buildings may be permitted in Lewisham Town Centre subject to assessment against a number of criteria including design; urban setting and townscape; transport accessibility; visual impact; effect on Listed Buildings and the setting of Conservation Areas; effect on Metropolitan Open Land and other open spaces; relationship to existing tall buildings and structures; relationship with the town centre's topography; and impact on microclimate and overshadowing. LTC OPP1a (General principles for Lewisham Gateway) states that tall buildings will be appropriate on the Gateway site subject to the relevant criteria under policy LTC URB1.

**6.5.4** The proposals set out in the planning application are considered to be part of a clear masterplan for the site that develops and refines the vision and principles set out in the Planning Brief, and the Design Strategy submitted with the application indicates the approach to and design quality aspirations for the high buildings and site as a whole. Both CABE and English Heritage have been consulted on the application and neither raises objection to the scope of the outline application nor the principle of tall buildings as part of the application. A Design and Access Panel, secured through the s.106, will



be established for the site to take the scheme forward and the Council is confident that the mechanisms are in place to deliver a high quality scheme.

- 6.5.5** The application proposes up to 100,000m<sup>2</sup> of floorspace. Whilst the Development Specification document states that it is the “current intention of the applicants to develop a scheme which has an optimum floorspace of 78,000m<sup>2</sup>” for the purposes of considering the impacts of the development and determining the application it must be assumed that the maximum scheme will be built out. The floorspace would be provided in six principal buildings located within the main development site (plus a separate building on the eastern side of Lewisham High Street). The Development Specification document identifies the maximum height of buildings across the site, with the tallest buildings up to a maximum of 77m in height (excluding plant room and vent shafts) located at the north western, north eastern and south western corners of the site respectively.
- 6.5.6** Building heights will vary across the site and within each of the building plots, and there is also variation in the orientation of the blocks at higher level so there will not be a continuous ‘wall’ around the perimeter of the site. The images in the ES as part of the townscape and visual assessment relate to the maximum (i.e. 100,000m<sup>2</sup>) scheme. The additional material submitted, which includes both verified views and artists impressions of what the development might look like from a number of long, mid and short distance locations, illustrate a scheme of 84,000m<sup>2</sup> but with buildings a maximum of 77m in height, i.e. the maximum height applied for. These provide a useful indication of the likely impact of the development and show a built form comprising a series of blocks with views through the site and around individual elements and with buildings stepping down in a number of directions across the site. In terms of views of the site, located as it is in a ‘bowl’ (with land rising to the north east, south east and west) the local topography means that the site is visible from a number of locations on higher ground that look down on and across Lewisham Town Centre. This includes from locations identified in the UDP as ‘Local Views’ where Policy URB22 of the UDP apply such as Hilly Fields to the west. Policy URB22 states that “development which impedes or detracts from Local Views ... will be resisted” and Schedule 1A of the UDP states in terms of the method of policy implementation in relation to Hilly Fields that it is to “maintain panoramic view of surrounding area by resisting large scale, bulky development in, and close to edges of park.” The Lewisham Gateway site is some 300m from Hilly Fields and therefore is not considered to be close to the edges of the park. The illustrative images of the proposed development indicate that the panoramic view from Hilly Fields will not be lost and whilst the Gateway development will introduce taller buildings in the middle distance there are views through and around the development. In the circumstances it is considered that the proposed development does not conflict with Policy URB22.
- 6.5.7** On the Gateway site there is a ‘mid-zone’ of development (34m up to 47m – approximately 10-16 storeys) located along the western and northern edges of the site and in two blocks running perpendicular to Lewisham High Street. At the lower levels the new pedestrian routes within the site will be defined by blocks 14m to 28m in height (approximately ground plus 3-7 storeys). The main pedestrian route through the site (which will be open rather than covered) is a minimum of 10m wide, widening at the southern and northern ends. This minimum dimension is slightly wider than the main north-south/east-west routes in the Riverdale Centre which are about 8-9m. The

route from the mainline station and DLR through the site to the pedestrian crossing on the realigned Rennell Street is some 200m long and will be broken up by a series of spaces and secondary routes that allow access to the wider area. Pedestrians will also be able to walk around the perimeter of the site to access the bus stops on the Molesworth Street and Lewisham High Street frontages. This combination of routes and spaces, with a mix of retail frontages predominately along the main north-south route and restaurants and cafes around the public spaces, offer a range of experiences for people using and visiting the site.

- 6.5.8** The overall plot ratio for the development – including, as is normal practice, the width of the roads – is around 3:1 (if the roads are excluded it rises to 5:1). Residential density on the main development site (i.e. excluding the Thurston Road site) is around 260-270 dwellings per hectare (dph), approximately equivalent to 670-700 habitable rooms per hectare (hrh), significantly above the normal borough-wide density range of 180-210hrh. However the site is located in a ‘Sustainable Living Area’ (Policy HSG17 in the UDP). These are focused mainly on the pedestrian catchment areas of major centres in the Borough, including Lewisham town centre, and are considered to have potential for sustainable development and innovative forms of urban living on the basis of their accessibility to town centre services and public transport links. When considering applications for residential development in these areas the Council may, subject to other policies in the Plan and the quality of the design of the proposed scheme, apply density, parking and other planning standards more flexibly.
- 6.5.9** London Plan policy on density (and parking) – Policy 4B.3: Maximising the potential of sites – also seeks to ensure that development proposals achieve the highest possible intensity of use compatible with local context, the design principles set out elsewhere in the London Plan and with public transport capacity. It states that boroughs should adopt the residential density ranges set out in Table 4B.1 of the London Plan, which in central locations indicates densities of 650-1100hrh (and car parking at less than one space per unit). Policy LTC HSG6 (Housing Density) in the Draft AAP states ‘that for guidance, the Council will consider Lewisham Town Centre a ‘Central’ setting when referring to the London Plan Density Matrix’. This general approach is reinforced in the London Plan Supplementary Planning Guidance on Housing (November 2005) which notes that to support likely sustained housing growth across London boroughs will have to identify new housing opportunities including on brown field sites across London and on sites within and around suburban town centres. The SPG gives guidance on how supply can be maximised from a range of sources with growth focused on areas with good public transport and with all new schemes expected to adopt high standards of design and construction. In this context it is considered that subject to the detailed design of the scheme the proposed residential density is consistent with strategic and borough policy.
- 6.5.10** In terms of how the proposed quantum of floorspace is accommodated on the site (i.e. the scale and massing of buildings) it is appropriate to consider both the site itself and the impacts of the proposed development on the immediate and wider locality. In general terms it is considered that a large amount of development has been skilfully arranged on the site with buildings respecting clear building lines. At a more detailed level the orientation of residential blocks raises an issue of north facing apartments which needs addressing as the scheme is worked up in detail, as do aspects of solar orientation.

**6.5.11** Given the existing natural and built environment within the Gateway site there is little local distinctiveness other than the presence of the Quaggy and Ravensbourne rivers. Policy LTC OS2 (Waterlink Way and Celebrating the river confluence) in the Draft AAP states that the Council will encourage the celebration of the confluence of the River Quaggy and River Ravensbourne within the redevelopment of the Lewisham Gateway site. Opening up the Quaggy and Ravensbourne within the site to create Confluence Place has the clear potential to form the basis for an attractive and potentially well-used park that would provide the development with its own unique identity. That 'sense of place' could be reinforced by the way the development interfaces with St. Stephen's Church and to a lesser degree the station. Overall the ability of the scheme to create its own distinctive character will be based on good quality architecture and imaginative streetscape to translate the overall masterplan into an attractive and functioning part of Lewisham Town Centre. It is crucial that measures and control mechanisms are put in place to deliver this quality. As mentioned above, it is proposed that a Design Panel will be set up, secured through s106 obligations, that would be involved in consideration of the details of the design of the scheme. The principle is supported by the Council and GLA, but its membership should be broadened to include representatives from access groups to ensure that the needs of the mobility impaired are an integral part of the emerging design. In addition, whilst the Design Strategy submitted with the application sets high standards in terms of quality or architecture, materials and maintenance it is considered that before development commences a more specific, detailed Design Framework document should be prepared in consultation with the Design and Access Panel committing to robust design principles and procurement processes to deliver the scheme. For example it is considered that there is scope to use different architects – working within clear overall design parameters, guidance, and carefully defined briefs for individual parcels established by the Design Framework document – to ensure both variety and quality, which will help contribute to the repositioning of Lewisham Town Centre as a key shopping and leisure centre in South London.

**6.5.12** In terms of the character of the proposed development the overall layout and block form are informed by the site shape that results from the proposed new traffic system and bus station layouts, as well as from the pedestrian desire line from the stations to the existing main shopping area to the south. The impact of the development on the listed church and Conservation Area is considered in more detail in Section 6.6 below. However from the illustrative images of the development and the specific design response as set out in the Development Specification document it is considered that the layout makes an appropriate response to the adjacent St Stephens Church in the form of a public space. This works well at ground level and with buildings up to 20m in height framing the northern and southern edges of the square and the scope for some form of canopy or roof structure (shown in the images) should be explored as this would enclose the space and give it a distinct identity. This is an important space and the detailed design of the scheme will need to fully address the interface between the Gateway development and the adjacent Conservation Area, for example:

- the current scope of the application would allow for a building up to 77m high on Plot D2. This needs to be carefully modelled to mediate the space and act as a 'partner' to St Stephens in providing its enclosure.

- the facade along Lewisham High Street facing the church and Conservation Area with service and access points on the ground floor, together with the relatively blank walls enclosing the likely location of the cinema could result in an interface of little visual interest the design options should look at animating this frontage to provide a positive relationship with the conservation area.
- landscape and varied façade treatments and the imaginative gables of the podium level apartment blocks shown in the illustrative images should be employed to help break up the mass of the buildings.

**6.5.13** Overall the aspirations are for good design standards across the scheme to create a distinctive harmonious and well-mannered development. To reinforce this commitment the applicant has drawn up a series of broad design guidelines based on the Design Strategy and which it is proposed should form the basis of a Design Framework. This will provide an appropriate basis to inform and brief detailed design work. It will also provide a mechanism to enable guidelines to be further prescribed, amended, managed and enforced through the lifetime of this project and as part of the briefing for any architectural competitions. Subject to the establishment of a Design and Access Panel and submission and approval of the detailed Design Framework prior to preparation and submission of reserved matters applications, secured by condition and through the s.106, it is considered the mechanisms are in place to deliver a high quality scheme.

**6.5.14** In terms of places and movement, the submitted parameter plans indicate a network of linked public spaces at ground level. These could work well though need to be refined in terms of microclimatic conditions, particularly around the main pedestrian route and St Stephens Square, to ensure these become attractive and popular places. Further, while the scale of the main pedestrian route is logically related to the efficacy of comparison shopping, catering for a large number of rail and bus passengers at peak shopping times needs to be factored in at detailed design stage to avoid pinch points. The extent and use of private open spaces for flat residents at podium level also require further work when the residential element is designed in detail and Officers are satisfied that these matters can be addressed through the detailed design work.

**6.5.15** The importance of creating a clear pedestrian-friendly environment within the road system is identified in the Design Strategy and links out, although rather limited in number due to the constraints of the extensive bus bays and visibility requirements at junctions, are considered to be appropriately sized. Parking is well hidden but the new traffic system and bus movements will be evident in many spaces. Mature planting would mitigate this in the longer term but in the short term attention is required to find an appropriate design solution to the potential exposure to traffic. The frontage onto Lewisham High Street (past the service area and car park entrances) needs to pay particular attention to the pedestrian environment and safety and Officers are satisfied that the mechanisms it is proposed are put in place to deal with design matters, including the establishment of the Design and Access Panel and preparation of the Design Framework document, will identify an appropriate solution.

**6.5.16** Within the site, entrances to flats will be determined by locations of service cores to blocks above podium level and seek to avoid breaks in key shopping frontages. Whilst this is a matter of detail to be resolved at a later

stage, it is considered that the suggestion in application documents that entrances to some flats will be along the busy Molesworth Street frontage where a large number of bus stops will be located needs further thought in order to ensure a high quality environment for all users of the site.

**6.5.17** Overall the scheme follows the broad principles set out in the approved Planning Brief. Four main design issues have been identified that need to be resolved as the project moves into detail.

- the presence and impact of the road system. The main highway network around the site can be traversed only at a limited number of pedestrian crossings and the challenge will be balancing the pedestrian and vehicular movement network to create an enjoyable public realm.
- the design of the main pedestrian route and St Stephens Square is a critical element of the scheme and requires careful design especially regarding the building D2 facing the Church.
- architectural variety and breaking up the implied angular nature of several blocks as well as creating a varied roofscape will help give this project a definable character. Using a range of architects could create interesting interactions that are often the source of the chemistry of a distinctive place.
- a key urban design question is ‘does the scheme relate well to its context?’ In simple terms, much of the existing context is not of high quality. However introducing such a major project into a generally low-rise local high street will inevitably cause impacts and contrasts. In this context details of the interface with St. Stephens, the Conservation Area and the High Street, especially in terms of active frontages and general massing, will need to be carefully considered.

**6.5.18** To address these points and other aspects of the detailed design a more comprehensive set of guidelines will be required. As mentioned above at the moment the design guidelines are in text form only. These should and need to be read in conjunction with design control drawings, diagrams and cross sections in a co-ordinated and readily accessible document to aid the Council in its design control and supervision function. It is therefore proposed that a formal Design Framework is developed bringing all aspects of the process together, including not only generic codes but also requirements as to a level of detail to be agreed with the Council at an early stage, whether this relates to materials, definitions of podium heights or cornice lines etc. As already indicated, the Design Framework needs to be in place prior to preparation and submission of reserved matters applications so as to ensure all applications reflect the requirements of the framework. This is to be covered by condition and through the s.106.

## **6.6 Residential and Affordable Housing**

**6.6.1** The application proposes up to 57,000m<sup>2</sup> of residential space, approximately 800 units. In terms of the size of the proposed residential units, although this is an outline application the Development Specification document identifies some broad parameters for the unit sizes as follows:

Studio	0-10%
1-bed	30-65%
2-bed	30-55%
3-bed	0-5%

- 6.6.2** On this basis the scheme could provide between 10% studio, 60% 1-bed, 30% 2-bed and no 3-bed at one extreme to no studios, 40% 1-bed 55% 2-bed and 5% 3-bed at the other. This is below the target mix for new housing as set out in the GLA SPG which seeks the provision of larger units and a maximum of 32% 1-bed units across all tenures, although for intermediate housing including shared ownership housing – which is proposed for the Gateway site – this figure is 66%. The unit size mix however needs also to reflect the characteristics of the site which in this case is not best suited to family accommodation given its location, density, form and immediate environment. Dealing with the needs of different types of housing and the different groups of occupants the GLA SPG on Housing states (para. 5.8) that “in broad terms, higher densities, which assume a lower number of habitable rooms per dwelling will be more suitable for households without children and will require less open space and play provision. Higher density can also be suitable for Town Centres and as an element of mixed use developments, where open space and car parking may be limited.” In the circumstances of this site it is considered that the overall mix proposed is acceptable. London Plan Policy 3A.4 requires a commitment to implement Lifetime Homes standards, subject to compliance being technically feasible, as well as 10% wheelchair housing units or units capable of adaptation. This will be secured through the s.106.
- 6.6.3** In terms of affordable housing provision it is proposed that, subject to financial viability, up to 20% of units will be affordable all of which is likely to be shared-ownership. This is considerably below London Plan target levels as set out in Policy 3A.7 which states that the Mayor’s strategic target for affordable housing provision is that 50% of provision should be affordable and within that the London-wide objective is for 70 per cent social housing and 30 per cent intermediate provision. However this is a London-wide target and needs to be seen in the context of London Plan policy 3A.8 (Negotiating affordable housing in individual private residential and mixed-use schemes) which states that Boroughs should seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes, having regard to their affordable housing targets, the need to encourage rather than restrain residential development and the individual circumstances of the site. Targets should be applied flexibly, taking account of individual site costs, the availability of public subsidy and other scheme requirements. Notes to UDP Policy HSG14 (Provision of Affordable Housing) refer to provision in Lewisham at 35% in relevant schemes although policy HSG14 recognises that provision depends on whether it would prejudice other planning objectives and the notes to the policy also state that the contribution will vary from site to site dependent on site conditions market conditions and other material considerations.
- 6.6.4** The applicants have presented a financial model to the Council and GLA that demonstrates that given the upfront infrastructure costs associated with the scheme, without grant assistance and an initial equity stake of 50% the development can support 15% shared-ownership units. Funding of £4.3m is required to raise this figure to 20%. The Council has had lengthy discussions with the applicants with a view to improving the affordable housing offer. The conclusion of this is that a ‘risk sharing mechanism’ has been proposed that seeks to ring-fence a proportion of any residual land value above specified levels to be directed towards improving the affordable housing offer on the site. Conversely should values decrease/costs increase then the amount and/or affordability of the units will fall, however it

is considered that in all the circumstances the mechanism is a reasonable one. Affordable housing, including the review mechanism would be secured through the s.106.

## **6.7 Conservation Areas and Listed Buildings**

- 6.7.1** The planning application boundary for the Gateway development extends into the western edge of the St. Stephens Conservation Area which runs along the River Quaggy although the existing Quaggy Gardens lies outside the Conservation Area. The Conservation Area comprises of the Grade 2 listed church, vicarage, five storey terraces and houses in Cressingham Road, St Stephen's Grove and Glenville Grove. The church faces directly onto the development site and there is an existing viewing platform across the River Quaggy fronting onto the building. The Belmont Conservation Area to the east straddles the western end on Belmont Hill as it runs down to Lewisham Town Centre.
- 6.7.2** Section 72 of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 (Listed Buildings Act) requires that in the exercise of planning functions special attention must be paid to the desirability of preserving or enhancing the character or appearance of conservation areas. PPG 15 states that, in the Secretary of State's view, this requirement should also be a material consideration in the planning authority's handling of development proposals which are outside the conservation area but would affect its setting, or views into or out of the area. PPG15 also notes that the objective of preservation can be achieved either by development which makes a positive contribution to an area's character or appearance, or by development which leaves the character and appearance unharmed. This is reflected in UDP Policy URB16.
- 6.7.3** Before assessing the impact of the proposed development on the conservation area and church it is appropriate to consider the existing relationship of the St Stephen's and adjoining Belmont Conservation Areas. At present the application site is dominated by the busy road system and bus layover and has little relationship with the St. Stephens Conservation Area and St Stephen's Church which are screened from the site by Quaggy Gardens and heavy vegetation along the eastern boundary of the River Quaggy. Existing buildings such as the Police Station, Citibank and the Riverdale Centre are visible from the conservation area and so views from it are already of modern buildings, and ones of a generally poor architectural quality. The residential streets closest to Lewisham High Street and the application site however are generally perpendicular to it and so tend to look into the conservation area such that although you are aware of the proximity of the town centre and busy road network, the focus is away from it. The exception is a terrace of late Georgian properties fronting onto Lewisham High Street but separated from it by the Quaggy and largely screened by a row of mature trees.
- 6.7.4** The Gateway application proposes the removal of Quaggy Gardens and realignment of Lewisham High Street further to the east i.e. adjacent to the River Quaggy and closer to the conservation area. The loss of open space this would involve is considered in Section 6.8 below. Whilst some of the existing 'buffer zone' between the conservation area and Lewisham High Street would be lost, this section of the River Quaggy and many of the existing trees would remain. In addition, in contrast to the existing condition

where the application site has no physical or visual relationship with the conservation area or listed church, the proposed layout of the main Gateway development provides a clear boundary edge along Lewisham High Street, and the location of the proposed St Stephen's Square within the development corresponds with the gable end of the church. A three storey building positioned at the northern end of the River Quaggy would be a lightweight modern element and bridge between the two areas. This part of the application is in detail and is considered in Section 6.12 below.

- 6.7.5** Clearly the scale of the proposed development is of a very different order from the houses in the conservation area and the listed church. The introduction of high buildings on the application site and subsequent change in scale adjacent to this predominantly residential area would be visible from the surrounding streets and would undoubtedly impact upon it. However given the existing situation it is considered that the impact on the conservation area would be neutral. At present whilst Quaggy Gardens functions as a buffer, the road system and bus layover make no positive contribution to the area in general and the setting of the conservation area and listed building in particular. Whilst the new development will impact on the conservation area in terms of views from it, it is considered that they do not detract from its inherent character and, as at present, the conservation area would contrast with the urban grain of the town centre.
- 6.7.6** PPG15 recognises that many conservation areas will include commercial centres but also that while conservation of their character and appearance must be a major consideration the emphasis should not be on restricting development but instead managing change. In this case, taking into account that the main development site is outside the conservation area it is considered that the small scale residential character of the conservation area would not be harmed. Views from other conservation areas are more distant and therefore the new buildings would be either part of the skyline or viewed occasionally between buildings or longer vistas. As such it is considered that the proposed development would not harm the integrity or setting of those conservation areas.
- 6.7.7** Although the current application, save in respect of Building F, is in outline in terms of the design of buildings the Design Strategy and illustrative images submitted with the application demonstrate an approach and aspiration to deliver architecture of a high quality. The combination of defined edges to buildings, stepping back of higher elements and careful selection of materials indicate how the buildings could be designed and the proposal to condition any permission, as explained elsewhere in this report, to require submission and approval of a detailed Design Framework based on the Design Strategy and the guidelines submitted to date prior to the design being worked up will give sufficient control.
- 6.7.8** In terms of the listed St Stephen's Church, this is situated on a small block with local residential streets either side, and houses to the rear (east). Designed by Sir George Gilbert Scott and built in 1863-65. Section 66 of the Listed Buildings Act states that in considering applications which affect a listed building, planning authorities should have special regard to the desirability of preserving the listed building or (as is relevant here) its setting and this approach is reflected in UDP Policy URB18. PPG15 also states that where a listed building forms an important visual element in a street, it would probably be right to regard any development in the street as being within the setting of the building. In the case of the Gateway application



although the listed St. Stephen's Church is separated from the main development site by Lewisham High Street it forms part of the street scene and therefore the guidance set out in PPG15 is of relevance.

**6.7.9** The immediate setting in terms of buildings is provided to the north by a terrace of houses that face towards it and the flank wall of the terrace of properties fronting onto the Quaggy/Lewisham High Street, and to the south by the new Police Station which makes little or no reference to the church. One of the striking features of the church is its gable end which currently faces onto the roads leading to/from the roundabout but otherwise has no meaningful relationship with the space. Close up views of the church would not be affected by the proposed development and the siting of a square within the Gateway site opposite would improve views of and appreciation of the church when compared with the current oblique and more fleeting views from pedestrian crossings and road islands. It is considered that the location of the square opposite would not only protect local views of the church but also provides a physical relationship with the surrounding area. Lower elements of the Gateway development framing the square would be situated opposite the church and provide an appropriate and modern setting for the church. In the circumstances it is considered that the setting of the listed church would be preserved. Again, whilst the application is in outline, it is noted that the requirement to provide the square opposite the church is to be secured through the s106 with control being exercised over the detailed treatment of this area. This combined with the proposed Design Framework will provide an appropriate further means of control.

## **6.8 Rivers, Open Space and Environment**

**6.8.1** The loss of Metropolitan Open Land has been considered in Section 6.3 above and the following considers other open space, the rivers and natural environment. The application involves the creation of an area of public open space at the confluence of the Quaggy and Ravensbourne rivers, referred to as 'Confluence Place' in the application documents. This amounts to some 1035m<sup>2</sup> of proposed soft-landscaped area plus the river course as well as hard-landscaped areas around the perimeter. In addition an area immediately to the west provides a hard-landscaped extension to the main Confluence Place. To the south is a separate new square, referred to as 'St. Stephen's Square' which provides some 900m<sup>2</sup> of space. The creation of high quality, accessible and useable spaces is an integral part of the Gateway development and needs to be balanced against the loss of existing public open space on the site at Quaggy Gardens to the east and Charlottenburg Gardens to the south-west of the roundabout.

**6.8.2** The London Plan, referring to the overall strategy for delivering sustainable development and a 'compact city', notes that open spaces, rivers and other water features should be protected and enhanced so that growth can benefit the city's breathing spaces. The London Plan also promotes the creation of new open space and Lewisham town centre is one of the 10 pilot projects in the Mayor's '100 Public Spaces' initiative. Also of relevance are policies in the London Plan relating to London's network of rivers – the Blue Ribbon Network – where UDP policies should protect and enhance the network as part of the public realm contributing to London's open space network.

**6.8.3** In terms of the protection of public open space (i.e. Quaggy Gardens), Policy OS7 of the UDP states that the Council will resist development that

would result in the loss of or damage to public open space and development that adversely affects the amenity, open character or appearance of the space through inappropriate scale. An exception to this approach where development may be permitted includes where a development makes provision for replacement open space of equal or better quality and size. This is also reflected in emerging policy on the Local Development Framework. A related consideration is the loss of trees from within the application site as a consequence of the proposed development. UDP Policy OS 10 (Trees in Open Spaces) states that the Council will seek to prevent the loss of trees of amenity value when granting planning permission and Policy URB 13 (Trees) states that the Council will seek to maintain, protect and increase the numbers and quality of trees in the Borough. The notes to Policy URB 13 state that the Council will discourage proposed development that would result in the loss or damage to trees especially those making an important contribution to the street scene or the character of a Conservation Area, and will normally require a proper replacement when a tree is felled. In this case trees will be removed, for example within Charlottenburg Gardens, Quaggy Gardens and within the grounds of the Sportsman public house. The application proposes tree planting within Confluence Place and along the eastern side of Lewisham High Street as part of the landscaping proposals which form part of an overall landscape strategy set out in the Design Strategy, details of which will be secured by condition and/or s.106 obligation. Whilst some trees within the site will be removed it is considered that in the context the provision of new trees as part of an overall landscape strategy for the new public spaces created within the site this is acceptable.

**6.8.4** There is some debate about the balance of ‘open space’ before and after the proposed development. Officers have undertaken an assessment based on the following general principles: land that is not easily accessible is excluded from the calculation, as is land which is part of the public highway i.e. footpaths rather than larger areas of open space (whether hard or soft landscaped). On this basis in the case of the existing situation land within the centre of the roundabout is excluded as it is inaccessible and cannot reasonably be regarded as having the same amenity use or value as areas such as Quaggy Gardens (which have been specifically laid out and landscaped as open space). Equally land within the boundary of the Sportsman public house has also been excluded as this is not publicly accessible other than to users of the pub. In the proposed layout pedestrian routes within the site have been excluded but ‘St Stephen’s Square’ (about 800m<sup>2</sup>) and the area in front of the DLR (forming part of ‘Confluence Place’) have been included. This results in an approximate net change as follows:

	Existing	Proposed	Net change
Metropolitan Open Land	3040m <sup>2</sup>	577m <sup>2</sup>	-2463m <sup>2</sup>
Accessible Open Space	1193m <sup>2</sup>	3450m <sup>2</sup>	+2257m <sup>2</sup>

**6.8.5** The resulting balance of gain/loss is somewhere between the calculations put forward by the applicant and objectors and the above calculation is considered to give a reasonable picture of the before and after scenarios. It is also relevant to consider the function, utility and perhaps more importantly the quality of the spaces that exist and are being created. In terms of high quality useable space in the town centre that the public might enjoy, at present Charlottenburg Gardens makes a limited contribution and whilst Quaggy Gardens has been laid out and is screened from the traffic on the adjacent roundabout it is still exposed to traffic noise. The main new space

within the application site, 'Confluence Place', is created by moving the Quaggy to the south away from the railway line and by having buildings to the north and south which shield it from noise sources. Together with the provision of access down to the river, landscaping and other water features this space has the potential to be a much more useable and pleasant space than those that currently exist.

- 6.8.6** The ES does however identify potential problems with this space particularly in terms of the wind environment and which without mitigation would not be conducive to sitting out. The applicants have proposed some general mitigation within the space – screens, tree planting – and this will need to be refined at the reserved matters stage to ensure a high quality space is provided and maintained. A related issue concerns daylight and sunlight to the space, a point picked up by CABE during pre-application consultation on the scheme. The sun-path analysis set out in the Design Strategy indicates that during certain times of the day the space will be overshadowed by buildings to the south, particularly during the winter months. However during the spring and autumn and more particularly during the summer when Confluence Place is likely to be used for sitting out the majority of the space will get direct sunlight throughout much of the day. The Development Specification document also imposes a lower maximum height on the building immediately to the south of this space compared with other buildings.
- 6.8.7** In terms of its quality, the fact that it would be situated away from the busy road system having a mix of uses adjoining the area is considered to ensure that the space would be active and useable with easy connections to the surrounding area. The existing open space at Quaggy Gardens was created with the construction of the roundabout in the 1990s, is bounded by a busy road and somewhat detached from the surrounding area. While the loss of open space is regrettable, in this case the provision elsewhere within the site of a high quality area of accessible open space is felt to justify the loss of Quaggy Gardens and it is considered that overall the open space provision would be enhanced as a result of the development in compliance with Policy OS7 of the UDP. Crucial to the provision and maintenance of quality public spaces will be the use of high quality materials and a clear maintenance regime. The Design Strategy document indicates the use of high quality materials which the Council will ensure are delivered through the proposed Design and Access Panel and agreement of a Design Framework and scheme specifications prior to commencement of development.
- 6.8.8** In terms of the rivers and their setting Policy 4C.20 in the London Plan (Design – starting from the water) states that boroughs should seek a high quality of design for all waterside development. All development, including intensive or tall buildings, should reflect local character, meet general principles of good urban design and improve the quality of the built environment. Further, development should integrate successfully with the water space in terms of use, appearance and physical impact and should in particular include a mix of uses appropriate to the water space, including public uses and open spaces, to ensure an inclusive accessible and active waterside and ground level frontage. The Quaggy and Ravensbourne rivers in this location have been heavily modified in the past and are either in culverts below the road or in deep concrete channels that are of limited ecological value. As a key part of the current proposals Confluence Place incorporates a more naturalised river setting with areas of planting and the

opportunity for direct connection with the water. Whilst the proposed development is likely to impact on biodiversity during the construction phase it is considered that the creation of riffles and pools in the realigned rivers together with river planting would improve the ecological value of the site and enjoyment of the rivers.

**6.8.9** There has been extensive consultation with the Environment Agency regarding the detailed design of the rivers and it is understood that the Agency is satisfied that the treatment of the water courses and the balance of culverting/un-culverting of the Quaggy and Ravensbourne rivers. Officers consider that the proposed development offers a number of benefits in terms of useable, accessible and high quality public space in the town centre and that the proposals are acceptable.

## **6.9 Social infrastructure**

**6.9.1** The proposed development, including the provision up to 800 new homes, will give rise to an increased demand for public services. In terms of demand for school places, based on the intended mix of unit sizes the ES identifies a child yield of up to 92 primary school places over the four age group intakes (Years 3-6) and up to 66 secondary places over the five age groups (Years 7-11). Lewisham Bridge Primary School is the closest school and is currently a 2 form entry school with an admissions limit of 60 children each year although it is proposed that the school reduce to 1 form of entry with an admissions limit of 30. The school currently does not recruit to its admissions limit, and over the past six years has admitted significantly fewer than 60 pupils to its reception year groups and with an average vacancy rate of 20 pupils in each year group. Extensive work has been carried out by the Council to assess the impact of reducing the primary provision at Lewisham Bridge taking account of admissions and vacancy rates as well as vacancies in local schools which could absorb any reduction in provision on this site. Even with a rise in demand for places based on population projections there is still capacity in the area. Whilst the impact on pupil numbers of plans for the regeneration of Lewisham town centre over the next decade will need to be kept under close scrutiny the number and nature of new residential developments that might house additional numbers of children in the area has been taken into consideration by the Council in its assessment of school places. In terms of secondary school places, investment through the Building Schools for the Future programme proposes increased provision including a new through school at Lewisham Bridge. In the circumstances it is considered that this provides sufficient capacity to accommodate potential secondary school age children living on the Gateway site.

**6.9.2** In 2004 the SRB Board published a Health Impact Assessment that sought to “formulate recommendations on how to capture the potential for positive change” arising from the Gateway development. The report identified a number of factors affecting health that are likely to change with the construction and operation of the proposed development such as increased noise during construction and decrease on completion, and conversely a decrease in access and mobility during construction but an increase on completion. As well as noting the cumulative impact of the various town centre schemes and the need to manage these strategically it also highlighted the importance through urban design of creating healthy as well as sustainable neighbourhoods, many of the principles of which are similar.

The report makes a number of recommendations relating to activities during construction and operation of the development as well as more strategic actions relating to social well-being across the town centre such as monitoring air quality and noise, promoting road safety and working with local schools to understand and address these issues. Whilst some of these are beyond the specific scope of the application and no specific measures are currently proposed by the applicant they will be encouraged to engage with local schools and businesses and the s.106 includes a contribution to the work of the Lewisham Town Centre Manager who will work with them and developer/contractors to facilitate this.

**6.9.3** In response to consultation on the application the PCT (with support from the NHS London Healthy Urban Development Unit) has identified the need for a financial contribution to health services arising from the Gateway development. Using its model it has identified a need for a financial contribution of £4,835,000 arising from the impacts of the Gateway scheme. Whilst the application does include an amount of floorspace specifically for health uses there is no other financial contribution. This is a consequence of the significant infrastructure costs associated with the proposed development, in particular the road, river and services diversions that are a fundamental part of the development and essential for delivering the scheme as a whole. The application includes within it a number of inherent benefits including new retail space and residential accommodation (including a proportion of affordable units), new public spaces and additional bus stop capacity all of which will make a major contribution towards improving Lewisham as a location and town centre. In addition the applicants have offered a £500,000 contribution to other projects in the town centre to enhance facilities and the environment. A number of projects have been identified for the use of this contribution – improvements to the river Quaggy beyond those proposed within the current application, to a Waterlink Way fund to improve the wider network of green spaces in the area, towards air quality monitoring and training for employment within the completed development – and in the circumstances it is considered that a contribution towards health services is beyond the capacity of the application and development finances. It is considered that any additional payment would mean that the scheme would not be viable and would therefore not proceed with the consequential loss of this opportunity to regenerate the town centre.

## **6.10 Sustainability, Renewable Energy and Sustainable Construction**

**6.10.1** The location of the application site immediately adjacent to the rail/DLR/Bus public transport interchange is an inherently sustainable location for development. Policy on sustainability and the use of renewable energy is more advanced in the London Plan than the UDP, consequently the London Plan and Further Alterations has informed the approach of the public authorities to this topic. Policy 4A.8 of the London Plan requires applicants to prepare an energy demand assessment and in Policy 4A.9 show how the development would generate a proportion of the site's electricity or heat needs from renewables, wherever feasible. The Mayor's Energy Strategy at the time of the application set this proportion at a minimum of 10% of energy demand although in the Draft Further Alterations to the London Plan it is proposed that this be raised to 20%. Policy 4B.6 of the London Plan (and SPG on Sustainable Design and Construction) seeks to ensure the highest standards of sustainable design and construction and applications for

strategic developments should include a statement showing how sustainability principles will be met in terms of demolition, construction and long-term management.

**6.10.2** The applicants have set out in a Sustainability Strategy submitted with the original application a vision and 'sustainability goals' for the site. This though is generalised and whilst providing a description of available technologies for such matters as energy, water management, materials and waste makes no specific commitment to embed sustainability principles in the scheme or its construction. The application also failed to include an energy demand assessment. In July 2007 the applicants submitted an Outline Planning Energy Statement which addressed a number of shortcomings in the Sustainability Strategy. The document is more robust and includes commitments on such matters as allowing for connections at the boundaries of the development site for adjacent redevelopment schemes. The strategy is less clear about the actual details to deliver the energy measures expected for a scheme of this size and nature and further explanation is needed on how the energy strategy relates to the phasing of the development. Discussions with the GLA are ongoing and it is proposed that this be controlled through conditions and an Energy Strategy for the site which will be secured through the s.106.

**6.10.3** In terms of sustainable construction the Design Strategy identifies a number of potential measures relating to such matters as the sourcing of materials, use of construction techniques and materials that reduce the volume of material required and waste minimisation. Whilst these are welcome as an aspiration it is considered that more specific commitments to particular approaches is required. In addition proposals for sustainable urban drainage, green roofs and rain water harvesting have been identified in the application documents as contributing to the overall approach to sustainability. This will be secured through condition and s.106 including the submission of an Energy Strategy for the use of renewable energy and other energy systems and energy efficiency measures within the development in order to secure a reduction in carbon emissions.

## **6.11 Access and highways**

**6.11.1** This matter is dealt with in detail in Section 8 of the report.

## **6.12 Other Considerations**

### **Quaggy Café**

**6.12.1** This planning application includes as a matter for detailed approval at this stage the building proposed to the east of Lewisham High Street. The building is to be sited at the northern end of the Quaggy before it passes under Lewisham High Street into Confluence Place and will lie within, though at the western edge of the St Stephens Conservation Area. Considerations relating to the impact of the development on the Conservation Area have been addressed in Section 6.7 of this report.

**6.12.2** The building is three-storeys in height and would provide space for A3/A4 uses (restaurants & cafés and drinking establishments) although the applicants have indicated their intention to use it for up to three years as a marketing suite for the main development. The proposal is for a metal clad

building stepped with terracing at its southern end. The main entrance, from Lewisham High Street, would be via a cylindrical structure containing a staircase and lift at the northern end of the building which would be top-lit. The building would be clad predominantly in metal and glass with aluminium louvres on the ground and first floor. The roof of the second floor would be a deck area with a steel pergola frame. The design of the building is uncompromisingly modern when set against the terrace of late Georgian buildings to the east. However, it is considered that the simplicity of the overall design and its orientation along the Quaggy means that it is able to stand as an independent structure within its setting and will preserve the character and appearance of the conservation area in accordance with PPG15 and UDP Policy URB16. It will provide a simple yet strong feature at the northern end of this part of the Quaggy and is considered a positive addition to the townscape in this location.

### **Travellers Site on Thurston Road**

- 6.12.3 The Thurston Road site that will be used as the bus layover facility is currently a Travellers site and the seven remaining occupied pitches will need to be relocated to allow the Gateway development to proceed. A site search was carried out on behalf of the Council in December 2006 and two potential sites identified. Following consultation with residents and businesses in the immediate vicinity of the sites the former Watergate School site in Church Grove was selected at the Mayor & Cabinet meeting on 28<sup>th</sup> June 2007 as the preferred site for the relocation of the travellers site from Thurston Road. The recommendation from that meeting was that further work should be undertaken on the design and planning of the site in order for it to be progressed and consultation has been undertaken with the travellers as part of this process. In the circumstances it is considered that mechanisms have been put in place to provide appropriate alternative accommodation the travellers.

### **Proposals for the Quaggy east of Lewisham High Street**

- 6.12.4 The planning application boundary is broadly consistent with the 'Gateway Site' in the Planning Brief though with some adjustments and includes the River Quaggy to the east of Lewisham High Street. This part of the Quaggy emerges from a culvert in front of the Police Station into a concrete channel before turning west under Lewisham High Street. Within the main development site the Quaggy and Ravensbourne will be diverted, remodelled and landscaped to provide a much improved environment. However, the applicants have always made it clear, from the stage of pre-application discussions, that the current planning application does not propose works to the Quaggy east of Lewisham High Street. This is because the financial information which underpins the application demonstrates that the scheme would not be viable if it has to bear additional costs associated with works to this part of the Quaggy. Lewisham and GLA officers have advised the applicants that whilst it may be acceptable to secure the delivery of Quaggy improvements through a combination of other funding sources it is essential that there is sufficient joint understanding of the potential scope of these works to enable the current planning application to be determined. As a result the applicants undertook to progress design work, at their cost, on a scheme that could be achieved with the road layout promoted by the current application. In late 2005, significantly before the Gateway planning application was submitted, the applicants consulted with the Environment Agency, Quaggy Waterways Action Group, the Police and

the Council on proposals for this part of the Quaggy. Unfortunately it was not possible to agree an acceptable scheme with all parties and, as a consequence, there has been delay in bringing forward proposals.

- 6.12.5** The Council has maintained throughout that a planning application for this part of the Quaggy should be submitted by the applicants before the main application is determined and has been supported by the GLA and Environment Agency in this regard. The GLA in its recent Stage 1 update report (August 2007) states that Officers are aware that improvement plans for this area are being prepared and it remains important for this separate application to be brought forward at the earliest opportunity to enable the Mayor to reach a view before the main application is referred back to him for a decision. The applicant has delayed progressing this application until matters relating to the design and modelling of flows in respect of the main part of the Gateway application site had been fully resolved and in the interim there have been discussions between the Council and Environment Agency officers regarding potential funding of a scheme for this section of the Quaggy. A sum of £150,000 towards the cost of the works was secured by the Council from the development of the police station site and in anticipation of the Quaggy application Officers are also proposing that half of the identified financial contribution to be secured through the s.106 agreement is directed towards the works. The Council has also been active with the Environment Agency in preparing bids for funding from the European Union under an appropriate programme and with officers from CLG Thames Gateway team to explore potential government funding. Notwithstanding the Council's express aspiration that an application be submitted before the main Gateway application is determined, and whilst the failure to submit an application is clearly disappointing, it does not invalidate nor prevent the Council from determining the main Gateway application.

## **7. ENVIRONMENTAL IMPACT ASSESSMENT**

### **7.1 Introduction**

- 7.1.1** As referred to above, paragraph 10 of Schedule 2 to the Town and Country Planning (Environmental Impact Assessment) Regulations 1999 (ES Regulations) identifies 'urban development projects' as requiring an environmental impact assessment (EIA) if they relate to sites of 0.5 hectares or more and are likely to have significant effects on the environment by virtue of factors such as size, nature and location.
- 7.1.2** Where EIA is required, the EIA Regulations require submission of an Environmental Statement (ES) to assess the likely significant environmental effects of the development at each stage of the development programme i.e. demolition, construction and operation. It must provide an outline of any alternative sites/schemes considered and the reasons for selecting the proposed development site. In terms of the effects of the scheme it must identify the baseline situation, the nature of the impact both direct and indirect, whether it is temporary (demolition and construction) or permanent (operation) and measures to mitigate the adverse impacts in each case. It must also identify the residual effects after mitigation as well as the cumulative effects of such a scheme in relation to other developments in the area. The Council cannot grant planning permission for any development which is required to be subject to environmental impact assessment unless



it has first taken the environmental information (see para 4.4.1 above) into consideration.

**7.1.3** An ES was submitted with the planning application in April 2006 and, where relevant, is referred to below as the ES. Following an appraisal of the ES by independent consultants appointed by the Council, the Council concluded that the submitted ES was deficient in a number of respects and that additional assessment work needed to be undertaken and further information submitted to the Council before it could determine the application. This further information was submitted in July 2007 and is referred to in the following section as the 'ES Addendum'. Additional information has also been submitted on flood risk and drainage, energy demand, renewable energy sources and sustainability, as well as illustrative information on the appearance of the scheme and visual impact. In response to issues raised by the Council and TfL in respect of the Transport Assessment submitted with the original application further and more detailed modelling work was undertaken. This additional information was also received in July 2007.

**7.1.4** Sections 7.2-7.16 below set out how the ES and ES Addendum have addressed the likely significant environmental effects of the proposed development, what the impacts are and proposed mitigation. It also sets out the Council's conclusions regarding impacts and proposed mitigation measures and identifies the mechanisms by which mitigation will be secured. The headings correspond to the relevant chapters of the ES.

## **7.2 Consideration of Alternatives**

**7.2.1** Section 3.8 of the ES notes that a number of development scenarios for the site have been considered by the Council and that the emerging policy framework favours regeneration of the Lewisham Gateway area. As a consequence a 'without development' scenario for the site has been considered and rejected at strategic level prior to preparation of the application and is therefore not included within the ES.

**7.2.2** In terms of the masterplan and specifics of the application the ES describes how the scheme has been developed through an iterative process responding to the challenges and constraints of the site to give a form of development considered to fall within an acceptable range of environmental effects. A set of development parameters for the site have been defined to enable the main and likely significant environmental effects of the development to be assessed, informed by a series of design and sustainability criteria, thereby limiting extreme alternatives and, in broad terms, producing variations around a common theme. As a consequence the applicant has not considered any significant alternatives to the submitted proposals in terms of location or development mix. However, a range of options have been considered through the scheme development process and in the opinion of Officers the applicant has satisfactorily addressed this aspect of the EIA Regulations.

## **7.3 Development Programme and Construction Sequencing**

**7.3.1** An indicative construction sequence (with more a detailed programme for the infrastructure works) has been prepared which assumes the entire development taking place over a six year period. Whilst a 'start on site' date

has not been fixed, the ES states that, at the time of its preparation, the infrastructure works were due to start in late spring 2007. This assumed that the application would be determined sometime in mid-late 2006, and extrapolating from that date if permission were to be granted for the current application in late 2007 then works might be expected to commence in summer 2008 (subject of course to the necessary approvals being in place). The infrastructure phase is estimated at 18 months (say until 2010) followed by a construction phase of around 4½ years (say until 2014/15) commencing with buildings on the north of the site which are likely to provide ground floor retail in Block A and restaurants in Block B with residential (including a proportion of affordable) above. Thereafter the blocks to the south would be built providing a mix of uses within a series of buildings. It is proposed that a condition be imposed requiring details of the phasing of the scheme to be submitted to and approved by the Council prior to commencement of the development.

- 7.3.2** In terms of impacts arising from construction (for example noise, air quality, socio-economic and traffic) these are identified in the relevant topic chapters of the ES. The Applicant has provided at Appendix C of the ES Addendum a breakdown of the volumes of construction traffic that are likely to be generated during the construction of the Lewisham Gateway development using the construction phasing that was presented in the Construction Phasing Report at Appendix A of the ES. Two options have been considered based on the timings of construction; Option 1 assumes that the enabling works and basement works are undertaken concurrently, Option 2 is based on staggering the works and is considered to represent the more realistic option and was used for the assessment. This choice is explained in Section 2.4 of the ES Addendum and is considered to represent the reasonable and likely worst case.
- 7.3.3** A Draft Code of Construction Practice (CoCP) has been developed covering all the major areas, and is presented in the ES Addendum at Appendix B. The Draft CoCP describes potential impact areas as well as mitigation measures under a number of topics. The monitoring section indicates there will be weekly checks of the CoCP, fortnightly environmental audits, and use of a Non-Conformance Report where necessary. The CoCP will be updated at least every six months. This is considered to be a sound basis on which to refine and agree the CoCP. However the London Best Practice Guide: the control of dust and emissions from construction and demolition (published in November 2006) recommends conducting an Air Pollution Risk Assessment (APRA) and although this is not specifically discussed in the Draft CoCP it is generally in compliance with this guidance document. It is considered appropriate that the applicant carry out an APRA and then implement the monitoring and control measures that correspond to the risk rating of the site. This could form part of the CoCP which itself is to be secured by condition or through provisions in the s106.
- 7.3.4** In the opinion of Officers the ES and ES Addendum have assessed the likely significant effects of construction which will be controlled through the CoCP, agreed by the Council prior to commencement of work on site. Subject to this it is considered that impacts will be kept to an acceptable level.

## **7.4 Socio-economic**

**7.4.1** This chapter considers employment impacts (construction and operational) plus other social and community impacts. Social infrastructure impacts (such as demand for school places) have been considered in Section 6.9 of this report and the following relates to employment impacts.

**7.4.2** The ES identifies two 'impact zones', an 'Inner Impact Zone' (within approximately one mile of the proposed site) comprising 14 wards in Lewisham and 4 in Greenwich, and a 'Wider Impact Zone' which covers the boroughs of Lewisham, Southwark, Greenwich and Bromley to reflect the likely wider extent of impacts. The assessment has been carried out in relation to the maximum and minimum scheme taking into account the phasing of the development and seeks to identify the net additional effects in terms of construction and operational jobs. Employment impacts of the completed scheme (i.e. new job opportunities in retail, leisure and office space) have been calculated using employment:floor space ratios based on English Partnerships guidance and notional employment densities. The employment impacts of the proposal assume the implementation of an employment and training strategy, secured through the s.106, that will be designed to maximise the jobs available on site for local people for the construction phase. It is proposed that training for employment in the completed development is also available and funded through the s.106.

### **Impact and Mitigation**

**7.4.3** Based on an estimated total construction cost for the maximum scheme of £250million (and minimum scheme of £180million) the number of construction jobs created as a result of the maximum scheme (including the highway works) is estimated to be 4,870 'job years' (3,500 for the minimum scheme) which in terms of comparable 'direct' employment opportunities represents 490 FTE jobs throughout the construction period (350 for the minimum scheme). Whilst a proportion of these jobs will be taken by people living within the identified impact zone there will also be leakage due to the high mobility of the construction industry, particularly skilled construction workers. Based on other major projects in the London area this is assumed to be about 60% which gives local employment effects for maximum scheme of 70 jobs filled by residents of the Inner Impact Zone and 120 jobs filled by residents of the Wider Impact Zone (53 and 88 respectively for the minimum scheme). The net figure taking account of deadweight (effects without the development) and displacement (people transferring from other construction projects in the area) is estimated at 53 jobs filled by residents of the Inner Impact Zone and 90 for the Wider Impact Zone. To this is added the multiplier effect of the construction project on the local economy for example through contractors placing service and supply contracts with other local businesses, which helps create jobs off-site, and through those employed on the construction programme spending a proportion of their wages locally. This gives total net construction employment of 58 in the Inner Impact Zone and 135 in the Wider Impact Zone for the maximum scheme (44 and 99 respectively for the minimum scheme).

**7.4.4** In terms of the employment in the completed development the ES estimates employment arising principally from the proposed office, retail, leisure, health, community and hotel uses plus nominal amounts from support services. This gives total gross direct employment of 1,300 for the maximum scheme (658 for the minimum). It is assumed that 20% of the

employment at the completed Lewisham Gateway site will be from within the Inner Impact Zone and a further 60% from elsewhere in the Wider Impact Zone giving a total of 1,040 for the maximum scheme (527 for the minimum). Taking account of deadweight and displacement this figure is reduced to a total of 780 in the Inner and Wider Impact Zones for the maximum scheme (and 395 for the minimum). Taking account of multiplier effects for the maximum scheme the ES estimates 215 FTE jobs in the Inner Impact Area and 878 FTE for the Wider Impact Area giving a total of 1,093 FTE jobs (553 FTE for the minimum scheme).

- 7.4.5** Officers consider that the methodology used in the ES is reasonable. Whilst the dynamics of the employment market particularly in London means that the job numbers identified within the Inner and Outer Impact Zones are only an estimate, it is proposed that measures are put in place (secured through the s.106) to maximise employment opportunities for local people. Given the limited existing job opportunities on the site it is considered that the direct and indirect employment opportunities that will be created both during construction and following completion represent positive and significant beneficial impacts of the development.

## **7.5 Transport**

- 7.5.1** This matter is dealt with in detail in Section 8 of this report.

## **7.6 Air Quality**

- 7.6.1** This part of the Borough is an Air Quality Management Area (AQMA) where concentrations of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>) are already high, the principal source being from road traffic. The ES notes for example that the annual mean concentrations of NO<sub>2</sub> have exceeded the national air quality objectives (NAQO) every year since monitoring at New Cross, Catford and Blackheath began although the short-term (1-hour) objective was not exceeded at any of these local monitoring sites. The annual mean concentrations of PM<sub>10</sub> in the area are lower than for NO<sub>2</sub> and the current NAQO value is achieved, however the short term objective is exceeded in some years at New Cross and Blackheath. The ES notes that similar exceedences are likely to arise close to the major roads in Lewisham Town Centre.

- 7.6.2** This part of the ES and ES Addendum assesses the impact of the proposals on local air quality from:

- construction activities and traffic during the build out of the scheme (although as details of the construction method have not been finalised no quantitative assessment has been made of the impact of the on-site plant);
- increased road traffic generated by the development when it is occupied/in use;
- specific sources when the development is complete (on-site combined heat and power facility using renewable energy – biomass – sources).

- 7.6.3** It is to be noted that whereas the ES assumed that there would be no major operations on site that would give rise to fumes, dust or other pollutants that would affect air quality, this has been amended in the ES Addendum to reflect the biomass CHP facility and the Council has considered the scheme on this basis. In addition, the ES failed to assess the impact of construction

traffic but this omission has been satisfactorily addressed in the ES Addendum. Further, in the light of discussions regarding traffic generated by the proposed development, additional analysis has also been undertaken by the applicant on the impact of development traffic which is considered by the Council to more accurately reflect likely volumes and hence impacts.

## **Impacts and Mitigation**

- 7.6.4** Construction activity has the potential to produce dust and other emissions which could impact on neighbouring properties, as well as on residents and businesses on site as later phases of the scheme are built out. The ES suggests these potential impacts are typical of major development projects and assumes the impact zone during construction to be around 100m or less of major dust generating activities, and this is taken as the zone for assessment. The ES concludes that there is a risk of dust annoyance/elevated PM<sub>10</sub> concentrations occurring during construction. Impacts can be mitigated through strict compliance with a Code of Construction Practice (CoCP) and through such additional controls considered necessary after risk rating the site in accordance with guidance in 'London Best Practice: The control of dust and emissions from construction and demolition. The applicants have prepared a draft CoCP which it is considered by Officers to incorporate appropriate mitigation measures and the need for the applicant to undertake an Air Pollution Risk Assessment is to be secured by condition. The impact of construction traffic has been assessed in the ES Addendum based on the additional traffic that will be generated compared with existing traffic in the area and assumes that construction traffic will not be permitted in the peak hours. Construction traffic is likely to peak at approximately 470 vehicles per week or 86 vehicles per day which equates to 0.2% of the average 12 hour flow. The ES considers this will result in a negligible change in air quality.
- 7.6.5** The impact of the completed development on air quality has been assessed by modelling concentrations of NO<sub>2</sub> and PM<sub>10</sub> at a number of locations in and around the proposed development including schools, residential properties, restaurants and areas within and adjacent to the site where people might congregate. In addition concentrations were predicted at various residential floor levels to assess how air quality changed with building height within the completed development. As well as impacts arising from road traffic the ES Addendum also assessed the impacts arising from the emissions from the proposed on site biomass CHP for which it has been assumed there will be four emission points (with each stack assumed to extend 3 m above the top of the corresponding building).
- 7.6.6** Based on a number of assumptions including future traffic flows, changes in background levels of pollutants and data from the traffic model the ES concludes that in both the 'with' and 'without' development scenarios the annual mean EU Limit value and NAQO for NO<sub>2</sub> is likely to be exceeded in 2012. The development will result in increased concentrations and for some receptors by up to 4%. The highest predicted annual mean concentrations are generally at locations such as bus stops and pedestrian crossings on the periphery of the site. The NAQOs and EU limit values for PM<sub>10</sub> will be achieved including for the 'with development' scenario. The air quality at the façades of the proposed dwellings are predicted to exceed the annual mean NO<sub>2</sub> threshold at the lowest proposed dwellings in Blocks A, B and C up to the 3rd, 2nd and 1st residential floors, respectively.

- 7.6.7** In terms of the impact of the CHP, the modelling has shown that the greatest impact of emissions from the CHP plant will be close to the buildings, which is most likely due to the down wash effects on dispersion. The ES Addendum concludes that the combined impact of the traffic and CHP emissions on air quality at existing dwellings near the proposed development are generally very small.
- 7.6.8** In terms of mitigation of construction impacts the applicant has submitted a draft CoCP and Officers propose that conditions and/or obligations be imposed requiring submission and approval of a full CoCP incorporating the identified measures (and others as appropriate) prior to any work (including demolition) commencing on site. Given the scale of the development it is also appropriate that the developer undertakes to monitor construction activities. Subject to securing the CoCP and related monitoring as well as prior approval of full details of any proposed plant Officers consider that sufficient controls can be put in place to mitigate impacts such that residual air quality impacts are acceptable.
- 7.6.9** In terms of operational impacts, these will be principally from traffic associated with the development. The ES states that there are no mitigation measures available other than those already designed into the scheme (i.e. the promotion of more sustainable modes of transport to reduce road traffic) and as a consequence there is considered to be a major residual adverse impact. For residential accommodation proposed as part of the Gateway development there will need to be some form of mechanical ventilation and Officers consider that acceptable conditions within the units could be achieved. A condition is proposed to ensure that such details are submitted
- 7.6.10** Officers note that for certain measures of existing air quality conditions within the site do not meet EU limits and national objective levels, and that with development they will be worsened with a major residual adverse impact. In this regard PPS23 (Planning and Pollution Control) sets out the matters for consideration when determining planning applications and Appendix 1G advises that for developments within or adjacent to Air Quality Management Areas “it is not the case that all planning applications ... should be refused if the developments would result in a deterioration of local air quality. Such an approach could sterilise development. ... Road transport is recognised as a significant contributor to poor air quality, particularly in urban areas. LPAs can play a key role by ensuring that developments reduce the need to travel and encouraging more sustainable travel choices.” As a town centre location immediately adjacent to a major transport interchange the site is highly sustainable. Accordingly a balance needs to be struck between no development occurring on this site (given existing and likely ‘with development’ impacts) and a development that can deliver a number of significant benefits for the town centre. In this case the current application proposes site-wide and individual building Travel Plans for occupiers incorporating a number of measures to promote non-car modes of transport and reduce trips arising from the development. Further, it is considered that appropriate mitigation can be provided for new residential units on the site and on balance Officers consider that the scheme benefits are significant and that the identified impacts (and mitigation) are acceptable.

## **7.7 Noise and Vibration**

**7.7.1** Noise and vibration impacts have been assessed in terms of proposed demolition and construction activities on existing and future sensitive receptors; existing and future noise and vibration conditions on proposed residential units within the scheme; and on existing sensitive receptors from changes in road traffic flows and carriageway layout.

**7.7.2** Annex 1 of PPG24 (Planning and Noise) sets out noise exposure categories for dwellings. The existing site is affected by noise from traffic and currently experiences exposure to noise at levels - Noise Exposure Category (NEC) D - where planning guidance states that planning permission should normally be refused.

### **Impacts and Mitigation**

**7.7.3** Noise levels have been calculated based on typical construction processes for each phase of development and assessed at a number of noise sensitive receptors. Based on a number of assumptions such as hours of construction and noise target levels (reflecting the site's location in an urban area and close to a busy road) the ES calculates that without mitigation the noise levels from the identified construction activities could result in an exceedance of the target noise levels at the identified receptors. In terms of vibration impacts, phases which include driven piling are most likely to produce perceptible levels of vibration. Mitigation is proposed through management of the site operations and construction methods to be incorporated within the method statement which will form the basis for the implementation of construction works. Officers consider that the identified impacts have been properly assessed and proposed mitigation is appropriate and should be secured by condition and/or obligations through the submission of construction method statements.

**7.7.4** In terms of noise impacts on completion, the ES Addendum identifies the main noise generating activity associated with the proposed development as road traffic, generated either by new development traffic on existing or new roads or by existing traffic reassigned to new routes being provided by the development. The ES Addendum also concludes however that traffic generated by the proposed development has little effect on existing off-site receptors although some would nonetheless be eligible for noise insulation grants. The ES Addendum has also assessed noise levels in amenity areas across the site noting that they may experience high noise levels. Various mitigation methods are described including screening and soft landscaping to reduce the number of hard acoustically reflective surfaces in the space and trees to diffuse the sound and reduce echoes. Water features are also identified as providing an element of masking noise that would reduce the impact of the road traffic noise.

**7.7.5** Some new residential properties within the site will experience noise levels rated as NEC D (and C) requiring mitigation in order to provide suitable internal noise levels. By way of mitigation the ES Addendum states that glazing to these properties will need to be specified such that a sufficient level of sound insulation is achieved. For the most affected units this is likely to be acoustically laminated double glazed units and secondary glazing. For room ventilation the ES Addendum recommends acoustically attenuated ventilation systems for habitable rooms in NEC B and above, and for habitable rooms located in NEC D mechanical ventilation maybe

required. More generally, in terms of the detailed layout of the units, the ES Addendum states that where possible habitable rooms should be located on facades which are subject to lower noise levels. Equally as it is usually the most acoustically weak element of a facade, the ES Addendum states that areas of glazing should be minimised for habitable rooms in areas subject to the highest noise levels.

- 7.7.6** The Council has considered the existing future and noise environment and concluded that whilst some parts of the site have been assessed as falling in NEC D mitigation has been identified that, subject to details, could deliver an acceptable internal noise environment and will be secured by condition. Some of the measures relate to the layout of units, and the provision of dual aspect flats so that habitable rooms can be located on quieter facades could be an important part of this. For those properties where this cannot be achieved then the detailed design of units will need careful consideration to ensure that the mitigation identified in the ES Addendum (i.e. minimising the amount of glazing) does not prejudice the quality of the overall architecture of the building and key façades in particular. Noise conditions within amenity areas on the site will also be high but it is considered that as an urban town centre site adjacent to a major road network noise levels will inevitably be elevated. However the ES Addendum has identified various landscaping measures that can contribute to mitigating these impacts and overall the proposals are considered acceptable.

## **7.8 Water Resources and Flood Risk**

- 7.8.1** The application site is located within the Environment Agency's 1 in 100 year indicative floodplain which is Flood Zone 3a i.e. there is a high risk of flooding. As part of the application to realign and enhance the Ravensbourne and Quaggy and associated works of un-culverting and culverting the river channels as well as the landscaping works within Confluence Place the applicants have undertaken modelling work of the river channels to establish whether the proposed works would result in an increased risk of flooding. This exercise was redone using a new TUFLOW/ISIS model of the Rivers Ravensbourne and Quaggy model adopted by the Environment Agency after the application was submitted. The modelling uses extreme flow conditions and includes an allowance for climate change.

- 7.8.2** The drainage strategy set out in the ES Addendum is to capture and use rainwater, maximise the use of sustainable drainage systems to reduce run-off rates, divert clean rainwater to the rivers and minimise rainwater discharges to the combined sewer system. The ES addendum calculates that the strategy proposed will achieve an overall reduction in discharge rates from the developed area of 23%.

### **Impact and Mitigation**

- 7.8.3** Conclusions of the modelling report as submitted are as follows: the results of the modelling for the Quaggy show that at most of the nodes the peak water levels are slightly reduced using the upgraded and revised models for the baseline and for both scenarios using the extreme 1 in 100 year condition and the 1 in 100 year condition allowing 20% for climate change. The results for the Ravensbourne show that the proposed realignment will not affect the existing situation.



7.8.4 The Environment Agency has been closely involved in the detailed design of the river channels and associated works and the current application proposals reflect their input and advice. The Agency is satisfied that the development does not increase the risk of flooding in the area. This part of the application is submitted in detail although the Agency has advised that there may need to be some minor adjustments to the modelling report and potentially the channel designs. The Agency is in receipt of the models used by the applicant to assess flood risk to allow them to confirm this going forward. This will also ensure no increase in the risk of flooding. From discussions with the Agency it is anticipated that they will recommend conditions relating to such matters as details of planting within the river channels, construction of the surface water drainage system, monitoring of ecological enhancements within the river channel and measures to prevent pollution to groundwater. At the time of preparing this report the Agency had not formally submitted the proposed wording to the Council and this will be reported verbally at the meeting.

## 7.9 Archaeological Resources and Cultural Heritage

7.9.1 The application site lies within a widely drawn Area of Archaeological Priority within the borough. A desk study of the likely effects of construction and operation on the archaeological resources in the area has been undertaken by MOLAS and is reported in the ES. Overall it is concluded that this location has a background level of archaeological importance that is low but with one area, around Lewisham Bridge, which can be considered to be of moderate importance due to the potential survival of medieval stone bridge foundations.

7.9.2 Although Lewisham is believed to be Anglo Saxon in origin no archaeological remains of this date have been identified within the development area. The ES identifies good potential for the survival of remains of medieval date across the site but it concludes that the majority of these remains are likely to be of low importance, although if remains of the medieval Lewisham stone bridge are found to exist these will be of medium importance. The ES identifies the greatest archaeological potential to be associated with post-medieval period and the confluence of the Quaggy and Ravensbourne rivers was a major factor in the development of the settlement here, providing water, transport and industry. A map of 1746 marks a "Stone Bridge" at the same location as that known to have been built in about 1473 which may have survived however by the second half of the 18th century, there was a brick bridge which in turn was replaced in 1873 by an iron one that survived until the whole area was rebuilt in 1992. The ES concludes that whilst the potential for surviving remains of post-medieval date is high these are likely to be of low importance (i.e. of district/local rather than national or international importance) damaged or compromised due to previous construction activity.

7.9.3 The main development site is not within a conservation area nor does it include any listed buildings however the eastern boundary of the application site lies within the St Stephen's Conservation Area to the east which includes the listed St Stephen's church.

### Impacts & Mitigation

7.9.4 Potential construction impacts include the truncation and removal of all archaeological and palaeoenvironmental deposits within the footprint of the

proposed basement car park areas (likely to have medium to high magnitude of change on the archaeological receptors within their footprint) and localised disturbance relating to piling for buildings (likely to have a low to medium magnitude of change on the underlying receptors) as well as changes arising from the localised diversion of the rivers. The ES considers that the predicted effects and significance of the archaeological and cultural heritage effects will generally be low however the exception to this will be the area around Lewisham Bridge where if any remains of the medieval stone bridge exist, the environmental effect will be major.

**7.9.5** The ES concludes that none of the potential archaeological receptors identified are considered to be of high enough importance to suggest preservation in situ would be the appropriate mitigation response on the basis of the guidance contained in PPG16, and accordingly preservation by record (excavation and recording) is proposed to mitigate satisfactorily against the potential impacts and effects. Mitigation would involve field evaluation in areas where a moderate or higher effect is believed to occur and where archaeological deposits may potentially survive, i.e. within the area of the proposed basement car parks and new river channels. Particular attention should be paid to the area surrounding Lewisham Bridge in order to determine the level of survival and extent of remains relating to the medieval stone bridge. An appropriate methodology would be developed to allow for adequate preservation by record of archaeological remains across the development area.

**7.9.6** Whilst this general approach is considered appropriate given the findings of the desk based assessment, it is considered that there should be specific mention of and provision for an archaeological watching brief during construction. This will also be required to implement 'Preservation by Record' which is the key mitigation that is proposed. The potential exists for remains of the Lewisham Bridge being in situ but given the extent of works over the years and loss of contextual information it is considered that preservation by record is appropriate.

**7.9.7** Subject to an archaeological watching brief during construction and a methodology being agreed for preservation by record Officers consider that the impacts and mitigation to be acceptable. In respect of the conservation area and listed buildings this has been considered in Section 6.7 of this report.

## **7.10 Ecology and Nature Conservation**

**7.10.1** This topic has been assessed based on a review of current biological records, consultation of relevant agencies and desktop and filed surveys. Although there are no statutory nature conservation sites within 1km of the application sites, there are a number of non-statutory nature conservation sites (e.g. undeveloped railway land and embankments) and green corridors (e.g. rivers) that have been designated by the Council. The surveys and consultation conducted for the ES revealed that whilst kingfisher and grey wagtail have been reported along the River Quaggy and bats are seen with some frequency feeding along the river corridors, there are no records to indicate that black redstart are present in the area of search (despite a viable population about 2 km away) nor reptiles, amphibians, common mammalian species (hedgehog, grey squirrel and fox) or stag beetles within the site itself. The conclusion drawn from the desk and field studies is that

the application site supports few ecological features and that of these only four – trees and scrub; river corridors, bats, and birds of conservation concern can be regarded as valued receptors.

## **Impacts & Mitigation**

- 7.10.2** The development of the site as proposed in the current application will require demolition of existing buildings, removal of the current landscaping, alteration to the roads, and the realignment of the Quaggy and Ravensbourne rivers. In terms of impacts therefore the ES assumes that the development will result in the loss of most existing habitats and the reconfiguration of watercourses through their redirection and a combination of culverting and de-culverting.
- 7.10.3** In terms of the construction phase, the removal of the areas of tree and scrub habitat within the application site will result in the loss of potential nesting opportunities for birds and foraging habitat for bats which cannot be fully mitigated in the short term. This loss is assessed in the ES as a minor adverse impact during this phase. The existing river corridors, though in places currently culverted and/or limited to concrete channels, are valued at a district/borough level as a habitat and important in providing ecological linkage. The ES notes that steps will be taken to safeguard against possible contamination during the realignment process but and given the current nature of the river channels the demolition and construction activities involved in the process of realignment will result in no significant impact on the River Ravensbourne or the River Quaggy. Although there is no evidence of bats roosting, they are known to use the site for foraging and the disruption and removal of habitat during the demolition and construction phase is assessed in the ES as likely to have a minor adverse impact. In the event that roost sites are discovered in the buildings to be demolished action will be required to mitigate the effects with a mitigation plan agreed and relevant licences obtained. For birds of conservation concern known to be present on site due to the poor habitat currently provided by the rivers within the site, the disruption that will result from the demolition and construction required to realign the river channels along with the loss of existing viable feeding habitat is assessed in the ES to have a minor adverse impact in the short term.
- 7.10.4** Following completion of the scheme the inclusion of native trees and shrubs in Confluence Place is assessed in the ES to be a slight beneficial impact. The naturalisation of the river corridor, use of various techniques to vary the flow within the channel and allow the development of a variety of micro-habitats, and introduction of native marginal planting is assessed in the ES to result in moderate beneficial impacts as the habitats become established and ecological viability of the rivers is enhanced. The inclusion of ecological roof zones in the building design including both brown and green roofs offers the potential for further new habitat creation.
- 7.10.5** Officers concur with the assessment of the impacts in the ES and consider that overall, and subject to the habitat creation measures outlined in the ES, the impacts on ecology and nature conservation are acceptable.

## **7.11 Townscape and Visual**

- 7.11.1** The scale of buildings proposed for the Gateway site and the existing built fabric means that scheme will have a varied though generally significant

impact on local and long distance views. The existing townscape and visual baseline conditions were identified from desk top studies and from surveys of the site. The locations for undertaking the assessment were discussed and agreed with the Council to provide long, middle distance and short range views towards the development, take in relevant Local Views identified in the UDP and provide views from most directions.

### **Impacts and Mitigation**

- 7.11.2** The assessment has used an accepted methodology and considers the potential changes/effects on the existing townscape; changes in view/visual on existing and key receptors and areas, including the effects of lighting; and on existing vegetation within the site boundaries as well as the degree of potential intrusion and changes in visual amenity relative to the existing situation including impacts on key views, and local and middle distance views from outside the site boundaries. The assessment was based on the maximum floorspace applied for and so represents the 'worst case' in terms of overall building height.
- 7.11.3** The ES assesses the existing townscape quality/value of the majority of the town centre to be medium-low with the physical and visual quality of the majority of structures being poor as are the open space areas with little homogeneity. The area is also dominated on its fringes by roads, traffic and visual clutter. Within the site itself the ES considers the townscape quality generally to be low and sensitivity to change is also low. The areas of open space within the site both to the west and east of the roundabout are considered to have a medium townscape quality and their sensitivity to change to the type of development proposed is considered moderate.
- 7.11.4** Areas falling within the conservation areas (such as the St Stephens Conservation Area to the east of the main development site) are generally considered to have a high townscape quality with sensitivity to change varying with proximity to the site; i.e. areas close to the site are considered to have a moderate sensitivity to change and areas further away a lower sensitivity to change as the site area is more distant and obscured. In the case of St Stephen's Conservation Area the ES considers that the low quality of the existing townscape with the roads and traffic and poor quality built form has a detrimental effect on the character and setting of this part of the conservation area. Although the River Quaggy is considered positive, the negative effect of this lack of quality is considered high. Further, although most of the conservation area is located very close to the main development site it is largely screened and as a consequence the rest of the area is only affected in a small way and the effect is considered negligible/low.
- 7.11.5** The development proposals include a significant increase in the density of buildings and built form in the area, which manifests itself in a large increase in building footprint in the development area, and a number of tall buildings. The ES notes that the increase in massing and inclusion of taller buildings (described as of a similar height to the existing Citibank Building) will considerably alter townscape character and the perception of Lewisham town centre. Whilst acknowledging that for some people this intensification may be seen as negative the ES considers that the extension of the existing town centre into a high density, mixed-use area will be highly beneficial in townscape terms due to the substantial changes and benefits that will ensue. These 'benefits' relate to the quality of the detailed design and use

of materials for the buildings, townscape and landscape features. However as an outline application these have yet to be specified and the material used for the assessment indicates simply overall height and massing in the form of blocks rather than design detail. As a consequence the beneficial impacts identified in the ES are not immediately obvious.

**7.11.6** The supplementary material submitted in July 2007 includes artist's impressions and verified views of the development from selected short, medium and longer distance view points. Whilst these are only an illustration and indicate a scheme of around 84,000m<sup>2</sup> compared with the maximum 100,000m<sup>2</sup> applied for they do demonstrate how variation in form, height, roofscape and materials as well as specific design features as part of the building elevations would break up the overall mass and could result in a high quality townscape. Given the outline nature of the application it is imperative that design quality is of the highest order. The Design Strategy and supplementary Design Guidelines submitted with the application highlight the importance of design quality and propose a joint LB Lewisham/LGDL Design Panel with representatives from Design for London, GLA and other relevant bodies be set up to manage and deliver this aspiration. As referred to elsewhere in this report, Officers also consider that a detailed Design Framework which clearly sets down the design principles and procurement process for individual buildings (as well as the site as a whole) should be submitted and approved prior to preparation of the detailed design and it is intended that this would be secured by condition. This would provide the required assurance about the quality of the architecture and be consistent with the guidance from English Heritage and CABE regarding outline applications that include tall buildings.

**7.11.7** Subject to the establishment of the Design and Access Panel and preparation of a Design Framework document the Council being implemented (which will be covered by condition/legal agreement) officers consider the residual impacts to be acceptable.

## **7.12 Wind**

**7.12.1** The proposed development includes a number of taller buildings and significantly alters the local environment in terms of buildings and spaces across the site. The wind environment within and around the site has been assessed using wind tunnel testing using a 1:300 scale model of the site and the surroundings within a 450m radius to give an overview of the wind conditions in terms of usability for pedestrian activities. Conditions are reported at a number of key locations: around Block A (i.e. close to the DLR), Confluence Place, Molesworth North Street pavement (west of block D), pedestrian access between blocks D1/D2 and C/D, St Stephens Square, Rennell Street, roof terraces on the eastern side of Block D and pavements and access routes to the East. Conditions were also assessed for different seasons (winter normally being the worst, and for summer).

**7.12.2** The results are described using the methodology of TV Lawson of Bristol University which is a widely used measure of wind conditions and identifies 'comfort criteria' (ranging from 'long term sitting' to 'business walking') and distress/safety criteria (relating to higher wind speeds). Wind conditions for the existing situation were observed to be generally in the 'standing' range with higher wind speeds in the south likely to be attributable to the proximity of Citibank Tower.

## Impacts and Mitigation

- 7.12.3** The site is relatively exposed to prevailing southwest winds and the ES notes that any medium rise development on a relatively exposed site will deflect the prevailing winds at ground level, potentially creating areas of increased windiness around it. The wind tunnel testing assessed the variants of the scheme – maximum (building heights ranging from 28m up to 77m in height), optimum (approximately 22m to 66m) and minimum (16m to 54m). In response to the findings of the wind tunnel tests landscaping, screening and canopies, developed to the degree appropriate for an outline planning application, were identified as mitigation and incorporated into the final assessment.
- 7.12.4** The following describes the findings from the testing of the maximum scheme in the worst season as conditions for lower schemes and during other seasons were less significant in all locations, albeit only marginally so in some places. Conditions to the north of block A are considered acceptable for general access but in excess of the Lawson Distress criterion for ‘General Public’ access to the south of the substation where further mitigation, such as screens or landscaping would need to be developed to create suitable conditions. Conditions in Confluence Place were generally in the ‘strolling’ and ‘business walking’ ranges and are acceptable for general access, apart from an exceedance of the Distress criterion for ‘General Public’ access at the end of the proposed porous screen proposed towards the western end of the space and where further screening, planting, or slight massing adjustments (to be explored through wind tunnel testing) are needed to create acceptable conditions. Conditions in the centre of Confluence Place were found to be in the ‘standing’ range and local shelter may be needed in areas intended for regular use for sitting. Along the pavement to the west of block D conditions were observed to be in the ‘strolling’ and ‘business walking’ range observed at the passage entrance between D1 and D2. Conditions along the pavement are in the ‘Standing’ range and acceptable for the intended bus stops. Conditions along the passage between blocks D1 and D2 were found to be suitable for general access. Along the main route through the development, between blocks C and D, conditions were generally observed to be in the ‘strolling’ range. This is acceptable for access use however additional mitigation (such as screening or planting) along the route would be needed to create acceptable conditions for general retail use. Conditions in St Stephen’s Square are assessed as in the ‘standing’ and ‘sitting’ range. Conditions along Rennell Street were observed to be very windy, with exceedances of the Distress Criteria for ‘general public’ access at both ends of the street and appropriate landscaping, such as trees and screens (and perhaps slight changes in the building massing) need to be developed to create acceptable conditions in this area.
- 7.12.5** The ES concludes that conditions around the site are generally acceptable for their intended uses although further and more detailed mitigation needs to be identified and assessed at the reserved matters/detailed application stage to overcome the identified areas of concern.
- 7.12.6** Officers consider that the methodology used in the ES to assess wind conditions is appropriate. Whilst conditions around the entrance of the Citibank Tower remain a concern and mitigation measures need further attention to identify how these might be satisfactorily addressed as part of the development of the Gateway site, it is considered that an acceptable

environment within and around the site can be achieved. Mitigation incorporated into the scheme during the assessment will need to be refined at the detailed design stage and it is proposed that a condition be imposed to ensure this is undertaken.

## **7.13 Daylight and Sunlight**

**7.13.1** The impact of new buildings on sunlight and daylight to residential properties in the immediate vicinity has been assessed based on the maximum (100,000m<sup>2</sup>) and optimum schemes (78,000m<sup>2</sup>). Houses on Silk Mills Path (referred to as Silk Mill Road in the ES) and Lewisham High Street (referred to as St Stephen's Grove) to the east of the Quaggy have been assessed as they represent the dwellings closest to the proposed development whereas other dwellings within the site and to the west of the railway were not assessed as these will be demolished prior to the construction phase of the proposed development or shortly after. The selection of these properties and use of Vertical Sky Component (VSC) to measure daylight to dwellings is considered by Officers to be appropriate.

**7.13.2** The view of the lower parts of the main development site from properties on Silk Mill Path will be obscured by the railway embankment although the upper floors of the development will be clearly visible and will have an impact on daylight and sunlight to the properties. For the terrace of properties on Lewisham High Street these are screened from the main development site by a number of mature trees interspersed with younger trees along the Quaggy which act as an effective barrier during the summer months when the sun is at it highest and will have an effect on the daylight availability for the properties under the existing conditions. The daylight and sunlight values in the ES are calculated without taking the trees into account. The effect of the trees, if they could be modelled, would be to significantly reduce the existing condition. The new development results would also be affected but to a lesser degree and as a consequence the % of the existing value will improve.

### **Impacts and Mitigation**

**7.13.3** The recommended minimum value for the vertical sky component is 27% or 80% of the existing condition and each of the assessed properties on Silk Mill Path will experience a loss of daylight such that the future condition with the Gateway development is less than 80% and is considered a major impact. A loss will also occur to properties on Lewisham High Street although as noted above the assessment does not take account of the existing trees which themselves will reduce daylight to the properties. In terms of sunlight, total probable annual sunshine hours expressed as a percentage should be at least 25% of which at least 5% should be available during winter. The criteria for annual and winter sunlight indicate that changes from the existing to the maximum development represent a severe to moderate impact however for each of the assessed properties, other than one (in winter condition) on Silk Mill Path which faces east, minimum recommended total and winter sunshine criteria are met.

**7.13.4** Given the existing trees affecting daylight and sunlight to properties on Lewisham High Street it is apparent that the impact is likely to be greatest to the properties on Silk Mill Path. One means of mitigation identified in the ES would be to use lighter coloured surfaces on buildings to increase the amount of reflected light received by the affected dwellings which would

also improve the perception of daylight availability when viewed through the windows. Alternatively the heights of buildings A1, B1, B2 would need to be reduced from the maximum proposed in the Development Specification document to a level where daylight in the properties on Silk Mill Path is within acceptable limits, sunlight levels generally being achieved. The assessment shows that values of VSC (i.e. daylight levels) for the Optimum scheme (assumed to have a reduced building height from the Maximum) are also below the design criteria although they are much closer with a reduction of between 4% and 12% below the recommended minimum value but still considered a negative moderate permanent residual impact.

- 7.13.5** In the circumstances Officers consider that the regenerative benefits of the scheme as a whole outweigh the loss of light to the identified properties, however this loss should be minimised through attention to the detailed modelling, design and materials used in the new buildings.

## **7.14 Land Quality**

- 7.14.1** An assessment of the potential ground contamination risks associated with development of the site has been determined by a qualitative risk assessment carried out using a Conceptual Site Model to identify 'source-pathway-receptor' linkages. Based on information available from published sources and external bodies together with information on the existing ground conditions, and significant parameters, characteristics and processes at the site that have relevance to the likely risk of contamination, the environmental impact is related to the potential for a significant source of contamination to be present, the potential for significant migration of the contaminant along a given pathway, and the potential for significant harm to sensitive receptors. These investigations indicate elevated concentrations of a number of heavy metals and hydrocarbons, including diesel range organics and polynuclear aromatic hydrocarbons, are present locally in the made ground and to a lesser extent the underlying natural deposits on the site. Although not specifically identified, given the nature of the historic development of the site the ES also notes that it is possible that local quantities of asbestos are present within the made ground on the site. .

### **Impacts & Mitigation**

- 7.14.2** The development will involve widespread disturbance of the site and, without mitigation could initiate pathways for adverse impacts. Potential impacts could include entry of contamination into groundwater, entry of contamination into surface water drainage systems, health risk to construction workers from exposure (by ingestion, skin contact etc) to contaminants, and health risk to nearby residents from dispersal of contaminated dust.
- 7.14.3** The applicant has assessed and proposed mitigation to address contamination on the site. In terms of potential impacts on site workers the ES states that the contractor will be required to produce Environmental Management Plans including site-specific method statements for the development of the site which will be within a framework set by the CoCP. These will include details of the measures to be adopted to mitigate the risk to site workers such as the provision of appropriate protective clothing and equipment and selection of appropriate methods of working to limit disturbance to the existing near-surface soils present on the site. The impact on groundwater will be mitigated in part by phased construction of



the proposed scheme and by the specific measures adopted to isolate or treat any significant areas of contamination encountered during the construction works. The impact on surface water resources, ecology and wildlife, and built environment during construction works were assessed to be not significant and no measures to mitigate the impact of the development were considered necessary. In terms of operational impacts on sensitive receptors these were assessed as generally low and as a consequence no measures to mitigate the impact of the development identified.

7.14.4 It is considered that the assessment is robust and that the identification of potential sensitive receptors, impacts and mitigation are appropriate subject to submission and approval of a project Environmental Management Plan prior to commencement of the relevant part of the development.

## **7.15 Other Issues Considered**

7.15.1 The ES includes a brief assessment of the proposed development in terms of demand for public utilities and their diversion as part of the infrastructure works and does not identify any major issues. The ES also considers waste management during construction and on completion/operation of the development and identifies the need for a waste management strategy for the site and it is proposed that a condition is imposed requiring its approval and implementation.

## **7.16 Impact Interaction, Cumulative Effects and Environmental Response**

7.16.1 The EIA Regulations require an assessment of the inter-relationships between effects and likely significant indirect, secondary and cumulative effects. Potential impact interactions and cumulative effects associated with other development in the area have generally been identified within the individual sections of the ES in terms of the baseline condition and consideration of extant planning permissions particularly in relation to transport matters. The ES states that it is anticipated that a Construction Management Plan will be the prime framework for controlling potential adverse effects during construction and that a long-term environmental management and stewardship plan for the site will be developed for the site to deal with such matters as ecological resources, water resources and the sustainable urban drainage system. These will be secured by way of condition and through the s.106 and in the approval of reserved matters.

## **7.17 Conclusion**

7.17.1 The ES and ES Addendum provide a comprehensive assessment of the likely significant effects of the proposed development during both construction and on completion/operation. The documents comply with the relevant Regulations in terms of their scope and methodology for assessment and reporting. As a major development there are significant impacts and, where appropriate, mitigation has been identified to address these impacts. There are some impacts where there will be an adverse residual impact and Officers have taken these into account in their consideration of the application.

## **8. TRANSPORTATION**

### **8.1 Introduction**

**8.1.1** The Gateway site is currently dominated by a roundabout, constructed in 1991 as part of improvements to the A20, which connects the A20 to the A21 and A2211. These routes carry large volumes of through traffic and during the morning peak period the A20 exhibits a pronounced tidal pattern with high demand in a north-westerly direction towards central London and the reverse in the evening. The Average Annual Daily Traffic (AADT) flow on the A20 is some 20,380 vehicles.

**8.1.2** Lewisham is well served by public transport with bus, train, DLR services and Lewisham is a regional bus interchange providing an important link between different public transport services. At present however the transport interchange and the town centre are severed by the roundabout and routes leading to it which make pedestrian access from the bus/DLR/rail services to the town centre difficult.

**8.1.3** A Transport Assessment (TA) was been prepared for the proposed development to estimate the amount of vehicle traffic generated by the development, the potential of public transport services to meet forecast demand and the impact on traffic movement through the town centre. Issues of highway safety and junction design have also been addressed. The highway infrastructure elements of the proposed development have been submitted in detail as part of the current application.

**8.1.4** To assist in the appraisal of the TA and consideration of transportation matters the Council appointed consultants to review the submitted documentation and advise on any gaps in the assessment. They identified a number of shortcomings in the assessment methodology and as a consequence supplementary information has been submitted and has informed the assessment of the transport impacts of the proposed development.

### **8.2 Overview of Transport Proposals**

**8.2.1** A key feature and structuring element for the Gateway scheme as a whole is the replacement of the existing roundabout with a series of linked signal junctions, termed the 'Low H'. Molesworth Street and Lewisham High Street are re-aligned to form the western and eastern edges of the site respectively. They are linked together by a new road approximately on the line of the existing Rennell Street with signal controlled junctions at both ends of the link, and a signal controlled pedestrian crossing at the mid-point. Signal controlled junctions are also proposed at the Molesworth Street/Loampit Vale junction and the Lewisham Road/Station Road junction. The A20 would route between Loampit Vale and Lewisham High Street via the 'new' Rennell Street and Molesworth Street.

**8.2.2** The transport proposals also include:

- Relocation of the station access road on Lewisham High Street to the north of its current alignment (and associated diversion of the River Quaggy to the south)
- Provision of a roundabout at the junction of the Lewisham Road and Lewisham Vale

- Provision of bus drop-off (alighting) and taxi stand to the new station access road
- Relocation of the existing bus layover from adjacent to the DLR station to a site in Thurston Road
- Relocation of bus stops (boarding) onto Molesworth Street to the south of the DLR station
- Relocation of bus stops (boarding and alighting) on Lewisham High Street
- Relocation of taxi bays from by the Clock Tower to Lewis Grove
- Relocation of station drop-off for private vehicles to Loampit Vale (the station access road will be for buses, taxis and disabled drivers only)
- Parking for up to 500 cars for residential units on the site

**8.2.3** The principle of the ‘Low H’ as a road layout, and consequential creation of a major development site within the boundaries of the road, was first set out in Lewisham’s SRB bid in the late 1990’s and subsequently refined through consultation on development options in mid-2002 and incorporated into the Planning Brief in late 2002. The applicants undertook consultation with a range of stakeholders prior to submission of the current application and a central transport theme that emerged was the need to provide a high quality, sustainable solution where the balance and choice between travel options is optimised. Whilst the highway solution had to maintain vehicular capacity, there was strong support for increased priority for pedestrians and cyclists through reductions in traffic lanes and more direct pedestrian and cycle facilities. The emerging layout which forms a detailed element of the current application seeks to balance the transport and highway requirements of such an important route in London’s strategic road network in terms of traffic movements through the town centre, accommodating a requirement of the London Mayor for a 40% increase in bus stop capacity, and maximising the quality of the public realm whilst also providing a development site that can deliver new shops, homes and jobs as part of Lewisham’s regeneration objectives for the town centre.

**8.2.4** The proposed layout has been further refined in consultation with TfL since submission of the application to improve the tracking of large vehicles and to optimise its traffic performance. In physical terms the ‘Low H’ is considered an appropriate arrangement and the scheme achieves an acceptable balance between the competing transport objectives. Minor highway management measures, such as the banning of U-turns at all new signal junctions to protect pedestrians using the proposed controlled crossing facilities, can be incorporated into the final scheme if required and monitoring of the network post-completion will also allow for adjustments if necessary to traffic signalling to optimise movement through the town centre.

### **8.3 Public Transport Services**

**8.3.1** Lewisham Station is a terminus for 15 bus routes, with 5 through routes also serving the town centre and the stations. Station bound services currently terminate at the Station Road alighting point and out of service buses stand adjacent to the DLR Station. Re-entering service, buses pick-up from bus stops located immediately outside the DLR station.

**8.3.2** The existing transport interchange does not function as a single entity with poor physical connections linking the various elements of the interchange

and a poor level of amenity for waiting passengers. The application proposes the following general arrangement for bus movements:

- Buses travelling north through Lewisham town centre towards Greenwich (existing routes 180, 199, 273 and 380) will travel along Lewisham High Street (with bus stops located at the Clock Tower and alongside the main development site) and then continue as normal along Lewisham Road. Southbound, buses will turn into Station Road and drop-off/pick up passengers at the new Molesworth Street bus stops then along Rennell Street before turning right onto Lewisham High Street where bus stops are located outside the Police Station.
- Buses terminating at Lewisham station (routes 75, 89, 108, 178, 181, 185, 261, 284, 484 and P4) will travel north along Lewisham High Street, left into Station Road and drop passengers adjacent to the DLR station. They will then turn right into Loampit Vale and park up at the new Thurston Road bus layover (accessed via Jerrard Street) until required for service. When back in service they will return along Thurston Road/Loampit Vale and pick up passengers on Molesworth Street before continuing south.
- Buses travelling west towards New Cross and Deptford (routes 21, 47, 136, 225, 321 and 436) will travel north along Lewisham High Street (with bus stops located at the Clock Tower), turn into Station Road (where there will be bus stops) and then right onto Loampit Vale. Buses travelling east will travel along Loampit Vale onto Molesworth Street where passengers can get on and off and then along Rennell Street and onto Lewisham High Street with bus stops outside the Police Station.

**8.3.3** This is considered an efficient arrangement with bus stops located close to the main transport interchange. The scheme as a whole incorporates a 40% increase in bus stop capacity as required by London Buses.

## **8.4 Highway Impacts**

**8.4.1** The performance of the proposed layout has been assessed making use of LINSIG, TRANSYT and VISSIM models, which have been developed in accordance with TfL's modelling guidelines. TfL have appointed consultants to review the models and at the time of writing, the LINSIG and TRANSYT models have been validated and are considered to provide sufficient indication of the performance of the scheme at the planning application stage. Whilst the VISSIM models are not strictly required at this stage they have been prepared and have been reviewed by TfL. Various matters including trip generation and modal share, highway layout, car parking and modelling have been agreed with TfL who have also given 'in principle' agreement to the overall impact of the development on both highway and public transport network. Officers and consultants appointed to advise the Council consider the modelling and results are acceptable in terms of impact on the highway network and public transport.

**8.4.2** The models have been developed for the weekday AM and PM peak hours (0800 to 0900 hours and 1700 to 1800 hours), to cover the following situations:

- Existing traffic
- Existing traffic + traffic from the consented developments at the Thurston Road industrial estate (B&Q proposals), the Venson Site on Conington Road and 72-78 Conington Road

- Existing traffic + traffic from the consented developments + traffic from the Gateway development.

8.4.3 The scope of the highway modelling set out in the TA and Supplementary TA is consistent with relevant guidance, though does not model as-yet uncommitted developments such as the Loampit Vale residential/leisure development or other development aspirations emerging from the Area Action Plan. A preliminary assessment by the Council of the impact of the Loampit Vale leisure scheme indicates that given the likely demand for the leisure facilities outside the am and pm peak hour for traffic there is unlikely to be a significant addition to the Low H highway network during peak hours.

8.4.4 The existing traffic flows were derived from a combination of surveys undertaken in 2003 and 2004. The surveys established that peak hour traffic levels declined between 2003 and 2004 (and from the Council's own surveys continued to decline/remain stable across the borough) and on this basis it is considered the assumption of zero background peak hour traffic growth is robust. The trip generation of the three consented developments has been taken from the TAs which accompanied those developments and as these documents have been validated by LBL and TfL as part of the individual planning application processes this approach is considered robust.

8.4.5 The trip generation figures for the Gateway scheme have been the subject of considerable discussion and refinement between the parties and are now considered robust. They have been based on established trip generation databases, with the resulting person trip rates given in Table 1. Using these figures it is expected that the development will generate a total of 16,000 trips by all modes on a typical weekday and 11,910 trips by all modes on a typical Saturday. The weekday PM peak hour (1700-1800 hours) is likely to be the highest period of trip generation with 1,250 trips by all modes.

Table 1: Lewisham Gateway trip generation by mode

<b>2-way trips</b>	<b>AM Peak hour (0800-0900)</b>	<b>PM Peak hour (1700-1800)</b>	<b>All day weekday</b>	<b>Saturday peak hour 1300-1400</b>	<b>All day Saturday</b>
Car driver	178	210	2938	183	2286
Car passenger	31	68	1342	127	1748
Rail	242	245	2107	48	704
DLR	108	123	1320	52	704
Bus	173	220	2690	156	1882
Pedal Cycle	19	27	360	8	86
Walk	214	325	4859	346	4307
Other	27	32	389	13	192
<b>TOTAL</b>	<b>992</b>	<b>1248</b>	<b>16005</b>	<b>936</b>	<b>11910</b>

Source: Tables A11 and A12, Appendix E, Supplementary Transport Assessment

8.4.6 Based upon the TRANSYT modelling presented in the Supplementary TA, the resulting highway layout is likely to be operating very close to capacity during the critical weekday AM and PM peak periods. The VISSIM models are being used to ensure that signal timings are set to ensure that queues

are contained within links and are unlikely to block back across adjacent junctions.

8.4.7 The unaudited VISSIM models have also been used to provide a comparison of journey times through the network. The Supplementary TA compares the performance of the existing and proposed highway networks, assuming the presence of existing traffic plus traffic generated by the committed developments and the Lewisham Gateway development, with the results summarised below.

Table 2: Average travel time per vehicle (seconds)

Time period	Buses	Other vehicles
AM peak hour existing	144	199
AM peak hour proposed	140	238
PM peak hour existing	157	238
PM peak hour proposed	155	296

Source: Table 7.6, Supplementary Transport Assessment

8.4.8 As Table 2 demonstrates, overall the Gateway proposals are anticipated to have a neutral impact upon bus journey times, which has been a key objective of the scheme from TfL. However, it can be seen that average journey times for other vehicles will increase by 40 seconds in the AM peak hour and 60 seconds in the PM peak hour. A comparison in the Supplementary TA of the average speed for vehicles travelling through the existing and proposed highway network indicates that vehicles will travel around 2mph slower through the Low H in the peak periods than they currently do. Whilst it is difficult at this stage to fully quantify the effects, the predicted additional journey times may encourage some drivers to avoid travelling through Lewisham town centre. As a consequence it is proposed that the applicant carry out (or agree to pay for) 'before and after traffic' surveys within an agreed study area encompassing the town centre and surrounding roads. The cost of the design, carrying out of public consultation on and implementation of traffic management measures that may be deemed appropriate to manage this situation should also be borne by the applicant. This would be secured through the s.106 as part of the provisions relating to implementation of the highway infrastructure works.

## 8.5 Access, Parking and Servicing

8.5.1 Three access points are proposed for the development, all located on Lewisham High Street, as follows:

- a signalled access adjacent to the realigned Station Road, providing access to up to 100 basement parking spaces
- a left-in/left-out access south of Station Road, providing access to up to 400 basement parking spaces
- a left-in/left-out access to a ground floor level service area immediately adjacent to the southerly parking access.

8.5.2 The application proposes parking at a ratio of up to 0.5 spaces per residential unit with the number of car parking spaces to be provided within the two proposed basements to be determined as part of the detailed Travel Plan which will be secured through the s.106 agreement. Whilst this level of provision is broadly consistent with London Plan and UDP standards, these are maxima and given the high public transport accessibility of the site it is considered that measures should be put in place to a) reduce dependence on the private car and b) encourage more sustainable modes of transport.

The applicant has indicated a willingness to review car parking for individual buildings as well as overall levels across the site and the Travel Plan submitted with the application identifies a number of measures including the provision of free bicycles for 50% of the residential units and promotion of a car-share scheme for residents to reduce demand for parking spaces. In order to avoid over-provision of car parking spaces it is considered that spaces should be taken up at no more than the maximum ratio of 0.5 spaces/unit and potentially at a lower level, with any surplus spaces allocated for the proposed car club and additional cycle parking.

- 8.5.3** It is also recommended that the car parking provision is further refined as part of the s.106 process, with an emphasis upon keeping the number of residential car parking spaces to the absolute minimum necessary thereby minimising the traffic generated by the Gateway. As recently achieved at the residential sites on Conington Road, it is proposed that occupiers of the Gateway residential units be excluded from being able to apply for on-street residents parking permits to discourage car ownership within the scheme and to protect the amenity of existing users of the surrounding controlled parking zone. This will be secured through the s.106.
- 8.5.4** Although the scheme makes no public car parking provision, it will increase demand for parking elsewhere within Lewisham town centre, not least because the proposals result in the closure of the 62-space Rennell Street car park. The applicants have provided a robust set of analyses within the Supplementary TA which demonstrate that under normal trading conditions there will still be a minimum of 55 spare town centre spaces on a typical weekday (out of a future total supply of 941 spaces) and a minimum of 35 spare spaces on a typical Saturday (out of a future total supply of 1129 spaces). Given this situation and the high level of public transport accessibility, the lack of provision of car parking (other than for disabled) for shopping and leisure visitors to the site and people working there is considered appropriate and acceptable.
- 8.5.5** The applicants intend to limit the size of vehicles servicing the development to 10m rigid vehicles. Appendix D of the Transport Strategy (which forms part of the Supplementary Transport Assessment) provides tracking runs which show that 10m rigid vehicles can reverse within the curtilage of the service yard and therefore enter/exit the site in forward gear. The applicants note that the service yard will need to be positively managed to ensure that the rate of service vehicle arrivals does not exceed its capacity. In addition, with the high predicted degrees of saturation on the highway network during peak periods it is appropriate to restrict service vehicle arrivals to outside these periods. A condition is proposed requiring the applicant to restrict the vehicle size to no larger than a 10m rigid and prohibit service vehicles entering the development between 0700 to 1000 hours and 1600 to 1900 hours, Monday to Friday.
- 8.5.6** The applicants have set out the proposals for cycle parking in Appendix B of the Transport Strategy, as follows:
- 1 basement cycle parking space per 2 residential units,
  - for those flats without a car parking space, provision of a free Brompton fold-away bicycle
  - establishment of a bike-share scheme to provide free bicycles to be used by residents

- for non-residential uses, provision of 499 cycle parking spaces in line with the TfL minimum cycle parking standards at various surface locations within the development. This would be delivered in a phased approach in accordance with demand with the location to be agreed in consultation with the Council.

**8.5.7** Overall the cycle parking strategy is reasonable and will be delivered through the site-wide and individual building Travel Plans which are secured through the s.106. On a point of detail, the basement parking will need to be carefully designed to ensure easy access to spaces for cyclists and as a consequence it is recommended that a condition is imposed which controls the detailed design of the basement area to ensure that adequate and fully accessible cycle parking spaces are provided.

## **8.6 Pedestrians and Cyclists**

**8.6.1** The scheme has been designed to improve pedestrian connections between Lewisham station interchange and the town centre with the provision of a north-south pedestrian spine through the centre of the development. Subsidiary east-west routes are also provided linking the main spine to the bus interchange and areas adjacent to the town centre. The main pedestrian route crosses Rennell Street by means of a 10 metre-wide single-stage signal-controlled pedestrian crossing with a proposed signal cycle time of 88 seconds in order to provide pedestrian waiting times less than 60 seconds. This is considered to provide a good standard of pedestrian progression between the scheme and the remainder of the town centre. Comprehensive controlled pedestrian facilities are proposed at all signal junctions.

**8.6.2** The 2006 TA highlights the potential for pedestrian congestion at two sites in particular: the northern end of the bus interchange on Molesworth Street and the north-west corner of Lewisham High Street at its junction with Rennell Street where levels of crowding exceed the Gehl standard of 13 people/minute/metre width of footway. It is unclear from the documentation how the applicants propose to address these deficiencies although it is considered that within the site they can be remedied at the detailed/reserved matters stage by imposing minimum pavement widths at identified pinch points in order to overcome this currently identified shortcoming of the layout. It is suggested that this is dealt with by condition. At the north-west corner of Lewisham High Street, in the short-term there are limited opportunities to remedy the situation due to multiple property ownerships in this location although the repositioning of bus stops away from this location will mean people will be passing through rather than congregating close to this junction.

**8.6.3** In terms of provision for cyclists the scheme proposes cycle signage linking the scheme to National Cycle Route 21 (Greenwich – Croydon link running beside the Ravensbourne River) and the existing on-street advisory cycle route on Lewis Grove and Belmont Hill. Currently no dedicated routes pass through the existing roundabout although as noted Route 21 runs to the west of the railway and which will remain. Whilst the new highway layout does not include dedicated cycle lanes, the design incorporates cycle advance areas at all signal-controlled junctions and cyclists travelling from Lewisham Road to Loampit Vale will be able to use Station Road instead of the route for cars and other vehicles via Rennell Street. In view of the number of people accessing public transport services via and facilities within



the Gateway site a cycle dismount policy will apply along the pedestrian routes within the development site.

**8.6.4** In designing the road layout and provision for road users, cyclists and pedestrians the applicant has sought to balance the competing objectives of maximising highway capacity to facilitate movement of cars, buses and services vehicles through the town centre; providing dedicated cycle lanes through the town centre; and providing a high quality environment for pedestrians where road crossings are as direct and short as possible. The proposal is to prioritise pedestrian and bus movements whilst making provision for cyclists through advance stop zones at junctions and it is considered that given the competing demands and constraints of the site an acceptable balance has been struck.

**8.7 Impact upon Public Transport and Taxis**

**8.7.1** A key feature of the scheme is the expanded facilities for buses, with new/enhanced stops on Station Road, Molesworth Street and Lewisham High Street and an enhanced bus stand on Thurston Road east of Jerrard Street. These facilities have been developed in close consultation with TfL and have been designed to accommodate articulated buses. All bus stops will be provided to TfL’s accessibility guidelines. Although the application site excludes the DLR and rail station, the applicants have put forward proposals for improved pedestrian access to/from these facilities, not least from surrounding bus stops. These will be worked up in detail in consultation with TfL.

**8.7.2** In order to enhance provision for buses within the centre as a whole whilst making appropriate provision for taxis the application proposes to relocate the existing taxi rank at Lewisham Clock Tower to Lewis Grove. In addition a rank is proposed on Station Road, and the existing taxi rank on the station forecourt will be retained. The Public Carriage Office have been consulted and have indicated that the proposals would be acceptable with the addition of a CCTV monitor/variable message signing on Station Road to overcome the lack of a direct sightline between the rank and the station forecourt. It is recommended that this design enhancement is secured by condition/s.106.

**8.7.3** The kiss-and-ride drop-off for Lewisham station has been relocated from outside the station to south side of Loampit Vale, making use of the current bus bay which will no longer be required under the Gateway proposals. This facility is considered remote from the station but given the number of buses using Station Road (necessitating the banning of private cars from this route) this is considered adequate. Provision has been made for disabled drop-off on Station Road.

**8.7.4** The applicants have assessed the public transport trips generated by the Gateway scheme and impact on existing services. Table 3 sets out the additional public transport trips anticipated to be generated by the Gateway from which it can be seen that the Weekday PM Peak hour is likely to be the heaviest period of demand.

Table 3: Lewisham Gateway – estimated public transport trips

<b>Time period</b>	<b>Direction</b>	<b>Rail</b>	<b>DLR</b>	<b>Bus</b>
Weekday AM Peak (0800 – 0900)	In	90	55	108
	Out	152	53	65

	2-way	242	106	173
Weekday PM Peak (1700 – 1800)	In	127	56	88
	Out	118	67	132
	2-way	245	123	220
Saturday Peak (1300 – 1400)	In	27	29	86
	Out	21	23	70
	2-way	48	52	156

- 8.7.5** The applicants have assessed the impact of the additional trips upon existing rail services, making use of spot counts of loadings on London-bound trains during the AM peak hour in June 2007. They conclude that the train service has the capacity to carry the additional rail passenger demand generated by the Gateway, although there will inevitably be an increase in the incidence of passengers having to stand. In relation to future capacity and investment in public transport infrastructure and services TfL's strategy – Transport 2025 – includes capacity enhancements to existing lines, the completion of the East London line phase 2, the Thameslink programme, investment in lengthening platforms and a further increase in bus supply of 20%. The publication of the Government's 2007 Rail White Paper, together with Network Rail's Route Utilisation Strategy (RUS) for South London, puts several of these initiatives on programme to be delivered. The Rail White Paper gives the full go-ahead for the Thameslink 2000 project to rebuild Blackfriars and London Bridge stations and the operation of 24 trains an hour through the central London tunnel, including routes through Lewisham. This £5.5 billion project will be completed by 2014. The Government has also approved the purchase of almost 1000 new carriages to lengthen trains to 12 cars and the Network Rail RUS is to propose platform lengthening and power upgrades to allow these services to operate. In particular, the draft RUS plans action to increase capacity at Lewisham by reviewing the 2009 planned service pattern to improve reliability, and retaining the current six peak trains an hour on the Hayes Line as well as general increase in train lengths to 12 cars. Some reconfiguration of rolling stock to increase standing capacity, albeit at the expense of seating, is also proposed. Any new rolling stock is likely to be of high capacity configuration. South Eastern have made it clear that their agenda as an operator is to see growth of 60% in passenger journeys by 2014. Beyond this date, changeover to onboard computer signalling will allow more trains to operate.
- 8.7.6** For Lewisham station, the Network Rail RUS proposes actions to improve passenger capacity at the station, especially the ticket hall, and rebuilding of the steps from platforms 1 and 4 to DDA compliant standards with lifts is about to take place. Lewisham is a possible candidate for a share of the £150m station improvement fund in the Rail White Paper and this could be the basis of a more comprehensive redevelopment of the station.
- 8.7.7** Based on data from 2004 the applicants consider that there is ample spare capacity on the DLR to handle the additional demand generated by the Gateway. Work on the DLR 3 car upgrade has already started, increasing the capacity in the peak period by 25%. Beyond this the reconfiguring of Delta Junction north of Canary Wharf will remove the current constraint on the number of trains that can be reliably operated and allow a further increase in service if needed. The constraint then would be the ordering of more vehicles. Beyond that in the very long term, improved signalling could further increase line capacity. DLR forecasting and planning takes into account all planned housing and employment development in its area and in the short term, the Woolwich Arsenal link on the DLR will attract some users

who formerly changed trains at Lewisham. Based on information provided by TfL the applicants also assess that the existing bus network can handle the additional trips generated by the Gateway development.

**8.7.8** Whilst the Supplementary TA assess the impact of the Gateway development on public transport capacity, it does not assess the impact of additional public transport trips generated by committed or potential developments elsewhere in the town centre. Officers have considered this and conclude that given the scale of investment in public transport infrastructure and services outlined above, the overall conclusion in the TA that there is sufficient existing or planned public transport capacity is unlikely to be changed significantly with the addition of trips from other town centre developments.

## **8.8 Disabled Access/Shopmobility**

**8.8.1** The Supplementary TA includes an Accessibility Strategy that provides further information on provision made for mobility impaired people within the Gateway development. The applicants note that the scheme has been designed to conform to current guidelines on inclusive mobility, with the at-grade crossings provided and designed to ensure that two wheelchairs can pass each other. In terms of gradients within the site, guidance identifies a maximum slope of 8 % (1 in 12) slope with 5% (1 in 20) is preferred. The main pedestrian route within the Gateway site is between the railway station, through the Gateway site, to the direct crossing mid-way along Rennell Street. The change in height over this 200m route is 1.9m which equates to an average slope of 0.95%, well below the advised maximum gradient. It is recommended that a condition is imposed upon the application to ensure that the public realm is designed with the needs of the mobility impaired in mind, including the detailed design, the position of signage, traffic signals and street lighting.

**8.8.2** In terms of parking provision, residential disabled parking will be provided in the basements at 10% of the parking and it is proposed to provide two on-street disabled parking spaces on the new Station Road for those visiting the site for shopping or other purposes. The proposals will involve the removal of 4 disabled parking spaces and dial-a-ride bay from Rennell Street and replace them with facilities on the eastern side of Molesworth Street adjacent to Lewisham Shopping Centre. The Shopmobility office would also be relocated under the Shopping Centre car park ramp between the new facilities and the entrance to the Shopping Centre. The proposed provision is considered a reasonable alternative to the facilities which will be removed by the upgrading of Rennell Street and this commitment will need to be secured through the s.106.

## **8.9 Travel Plan**

**8.9.1** The TA includes outline proposals for a Travel Plan for the development and the Supplementary TA refers to the preparation of a Sustainable Transport Plan which will set out a combination of travel measures aimed at promoting and facilitating the use of alternative modes of transport and reducing the emphasis on car use. Measures to encourage use of sustainable modes and discourage car ownership, potentially include:

- provision of an on-site travel information centre, to be operated by Transport for London

- potential provision of a car club
- introduction of car sharing database, such as Liftshare
- provision of showers in all commercial buildings, to encourage cycling
- provision of on-site cycle repair facilities

**8.9.2** The Travel Plan proposals are at an early stage but the applicant has shown a willingness to develop and refine this with the key agencies to produce a robust and effective document and series of measures. The preparation and implementation of this should be secured through the s.106.

## **8.10 Conclusion**

**8.10.1** Based upon the above, it is considered the transport elements of the proposals have now been sufficiently detailed and justified to enable outline consent for the development plus detailed highway infrastructure to be given subject to conditions, S106 and referral to the GLA.

## **9. CONSIDERATION OF OBJECTIONS**

### **9.1 Introduction**

**9.1.1** The scale of development proposed for Lewisham Gateway has generated considerable interest amongst local residents, interest groups and other consultees. The objections received cover a range of topics but can be grouped into five broad categories:

- Scale of Development and Tall Buildings
- Impact on Existing Town Centre
- Housing
- Loss of Metropolitan Open Land, Green Space and Impact on Rivers
- Traffic
- Environmental Impact

### **9.2 Scale of Development and Tall Buildings**

**9.2.1** Objection has been raised by local residents to the scale of development and the height of buildings. Particular concern has been raised by residents located some distance from the application site who currently enjoy a view from their properties across Lewisham town centre towards for example Blackheath and Shooters Hill beyond. The objections also relate to the lack of design detail of the buildings as well as the micro-climatic conditions within the site. Linked to this is whether as an outline planning application incorporating tall buildings the Gateway application is valid.

**9.2.2** Section 6.5 above has considered the issues as they relate to scale, massing and design and 7.11 in respect of the assessment in the ES. The scale of development proposed will clearly change the appearance of the town centre and skyline from more distant views. However it is considered that the underlying premise of the masterplan in terms of developing a highly accessible site immediately adjacent to public transport services at a high density and linking this with the existing town centre is supported by national, regional and local planning policy and the translation of the aspirations set out in the Planning Brief for the site is robust. The outline application is supported by a Design Strategy to demonstrate the design quality aspirations of the applicant and will be secured through the establishment of a Design and Access Panel and the early approval of a

Development Framework document for the site which will ensure that the expected design quality is delivered.

- 9.2.3** Existing short, medium and longer distance views are of a range of building heights and designs together with green spaces. The images in the ES prepared for the purposes of the townscape and visual impact assessment imply a solid built mass. Illustrative images that have been submitted subsequently reflect more accurately the built form and indicate a modelled appearance to the buildings of varying heights and architectural treatments and a skyline with gaps between buildings. It is considered that they demonstrate the potential for a high quality scheme which will be secured through the Design Framework document and work of the Design and Access Panel. It is considered that existing Local Views such as that from Hilly Fields which offers a wide panorama, and which takes in Lewisham Town Centre as one element in the view, will not be harmed.
- 9.2.4** In terms of the impact of the development on conditions within and around the site these are considered in section 6.5 (overshadowing), 7.12 (wind) and 7.13 (daylight and sunlight). It is considered that the modelling work undertaken for the ES has demonstrated that whilst there are some residual adverse impacts, with mitigation and refinement at detailed design stage then conditions within the site will generally be acceptable. Nonetheless a few properties around the site will experience a loss of daylight. On balance it is considered that the proposed development is appropriate in scale and purpose for the Gateway site and will make a major contribution to the regeneration of the town centre and that the benefits of the scheme outweigh the disbenefits arising.
- 9.2.5** Procedurally, guidance from CABE/English Heritage states that outline planning applications for tall building proposals are appropriate only in exceptional cases where the applicant is seeking to establish the principle of a tall building as an important element within a robust and credible masterplan for an area to be developed over a long period of time. Lewisham Town Centre is identified in the UDP as a location where tall buildings may be appropriate and the Planning Brief for the site indicates the potential for tall buildings. This is dealt with in Section 6.5 of the report and it is considered that sufficient and appropriate information is provided in the application documents to determine the application.

### **9.3 Impact on the Existing Town Centre**

- 9.3.1** Objection has been raised about the impact of the additional retail space proposed in the application on the existing shops in the town centre. In addition local businesses within the application site have expressed concern about their prospects and others about the type of shops that will occupy space in the development.
- 9.3.2** Section 6.3 of this report sets out the planning considerations in respect of retail floorspace. The UDP and Planning Brief for the site both promote the provision of additional retail space within the town centre and the application site in particular. This strategy is supported by research undertaken by the Council in terms of the need for additional retail space in the town centre as well as by the owner of the Riverdale Centre who has expressed the view that the development will be a positive benefit to the long term future of the retail offer in Lewisham and the vitality and vibrancy of the town centre.

**9.3.3** Officers are of the view that the application offers a major opportunity to address some of the particular problems facing Lewisham town centre both in terms of retail floorspace provision but also linkages between the transport interchange and the existing town centre. It is considered that the proposals represent a major boost to Lewisham town centre and are acceptable.

## **9.4 Housing**

**9.4.1** Objection has been raised to the appropriateness of the site for housing, the level of affordable housing and lack of playspace. Matters relating to air quality and noise are addressed in Sections 7.6 and 7.7 of the report and it is considered that whilst there will be a slight deterioration in air quality at existing receptors and noise levels are elevated, mitigation through the detailed design of the residential units will achieve an acceptable internal environment for residents within the site. In terms of the provision of affordable housing, whilst this is below UDP and London Plan target levels the applicant has demonstrated through financial modelling of the scheme that providing additional affordable housing would not be viable. This has been agreed in principle by the GLA and the Council however a mechanism is to be incorporated as part of the s.106 which will direct a proportion of any increased residual land value above forecast levels into providing additional affordable housing. This is considered in Section 6.6 of the report. A condition is included requiring details of children's playspace within the scheme to be submitted for approval.

## **9.5 Loss of Metropolitan Open Land, Green Space and Impact on Rivers**

**9.5.1** The application involves the loss of Metropolitan Open Land (MOL) and as such represents a departure from the development plan. In addition there is a reconfiguration and relocation of open areas and rivers within the application site boundary. Particular concern has been expressed about the works to the rivers and lack of an application or proposals for the Quaggy east of Lewisham High Street. In addition concern has been expressed about the potential for flooding.

**9.5.2** The policy considerations relating to MOL are set out in Section 6.4 of this report and it is considered that the regeneration opportunities from the development for the site as well as the town centre as a whole represent very special circumstances justifying the loss of MOL. This conclusion is also reached by the GLA. In terms of other open space currently within the site it is considered that the provision of Confluence Place and St Stephens Square provide open space that is considerably more useable and accessible than existing space at Charlottenburg Gardens and Quaggy gardens. This is considered in Section 6.8 of this report and it is considered that on balance the open space provided as part of the application represents a significantly better quality of environment. The failure of the applicant to submit an application for the Quaggy east of Lewisham High Street is disappointing but does not invalidate the Gateway application nor prevent the committee from determining the application before it.

**9.5.3** In terms of flood risk, the scheme was the subject of a Flood Risk Assessment as part of the ES and modelling was subsequently undertaken using the Environment Agency's new system based on extreme flow conditions and including an allowance for climate change. This is reported

in Section 7.8 of this report and the Agency is satisfied that the development does not increase the risk of flooding in the area.

## **9.6 Traffic**

**9.6.1** The application proposes radical changes to the road layout to the north of the existing town centre and routing of vehicles around the main development site via the 'Low H' arrangement. Objection has been raised by local residents about whether the proposed highway layout will operate efficiently with the existing and more particularly the future (i.e. with development) levels of traffic. Concerns have also been expressed about the capacity of public transport services, particularly mainline rail, to handle the extra demand from the Gateway site, provision for cyclists and for pedestrians.

**9.6.2** Section 8 of this report examines the transport implications of the development and concludes that the highway network will be able to handle the projected volumes of traffic. This conclusion is supported by the GLA and TfL who have also verified the modelling work submitted with the application. In terms of public transport capacity, significant investment in rail services were announced recently by the Government and infrastructure and service providers and it is considered that adequate capacity exists or growth is planned. Given the numbers of people passing through the main development site for public safety reasons it is proposed that this is a dismount area for cyclists. Provision for cyclists within the road network is in the form of advance stop zones at traffic lights. Whilst cyclists groups have sought to have dedicated cycle lanes incorporated into the new road layout a balance has had to be struck between improving arrangements for pedestrians and the overall extent of highway infrastructure. This is considered in Section 8.2 of this report and it is considered that the balance achieved is reasonable.

**9.6.3** The site masterplan provides direct pedestrian connections between the mainline and DLR stations and bus stops within or adjacent to the Gateway site and the town centre via a single crossing on Rennell Street. This is considered to be a significant improvement on the existing arrangement. Connections for pedestrians from the wider area through the site will also be maintained or improved through the provision of additional connections. Modelling of pedestrian routes in the TA has indicated that given the numbers of people accessing public transport services via the Gateway site there are some 'pinch points' within the site. The masterplan and Development Specification document incorporates some flexibility in terms of the detailed positioning of buildings and it is considered that concerns regarding pedestrian safety and comfort can be appropriately dealt with at the detailed design stage and a condition is proposed to specifically deal with this matter. Whilst pedestrian routes along Loampit Vale under the railway will remain busy, there is the potential, subject to agreement with rail operators and funding, for a new station access via Thurston Road which would provide an alternative route to the station. In the circumstances it is considered that overall the scheme will improve arrangements for pedestrians.

## **9.7 Environmental Impact**

- 9.7.1** Objection has been raised to a number of topics in the ES including air quality, noise and micro-climate. The site is located within an Air Quality Management Area (as is much of this part of the borough) and currently experiences elevated levels of pollutants attributable in the main to road traffic. Noise levels are also significantly elevated though not untypical of inner urban sites adjacent to busy roads. The inclusion of tall buildings as part of the proposed development results in impacts within the site and immediately around it in terms of for example increased wind speeds and loss of daylight.
- 9.7.2** The ES and ES Addendum have assessed the environmental impacts of the development on sensitive receptors such as adjacent residential properties as well as on future residents living on the site. These have been considered in Section 7 of this report. The ES and ES Addendum conclude that on the maximum scheme and worst case scenarios for some topics and receptors there will remain residual major adverse impacts. The ES and ES Addendum state that in some circumstances these can either be mitigated to a level where for example an acceptable internal residential environment can be achieved or where the external conditions are reasonable. Where residual major adverse impacts a judgement is needed as to whether the conditions are so unacceptable that planning permission should not be granted. It is considered that these circumstances are limited and that the effects identified in the ES and ES Addendum can be mitigated during the detailed design of the scheme. For example, noise conditions at the site are already high and will remain so with the proposed development (see section 7.7 of the report). This is not untypical of many inner urban sites on the main road network and does not, of itself, preclude residential development on the site. Residential properties on the site will however require mitigation through the use of acoustically laminated double glazed units and secondary glazing, the details of which will be designed to achieve an acceptable internal environment and external appearance. Appropriate mitigation measures will be secured by way of a range of conditions and/or obligations in the proposed S. 106 agreement.

## **10. LEGAL AGREEMENTS**

### **10.1 Introduction**

- 10.1.1** Officers have been in negotiations with the applicants and their advisers to agree a package of community benefits from the development of the Gateway site. In this case, as well as securing the various elements required to deliver the project (such as highway infrastructure works) and commitments made in the application itself (such as affordable housing and renewable energy), a range of other contributions and obligations have been secured that, in the opinion of Officers, are appropriate and relevant to mitigating the impact of the proposed development.
- 10.1.2** Whilst the financial package secured is modest in terms of the scale of development this needs to be seen in the context of the significant up front investment in highway, river and services diversions and associated works. The development itself will deliver a major infrastructure project which has been at the core of the Urban Renaissance Lewisham SRB programme and therefore the inherent benefits of the scheme make a substantial



contribution to the ongoing regeneration of the town centre, significantly enhance the public realm for local residents, visitors and workers in Lewisham.

**10.1.3** The draft Heads of Terms cover the following matters:

- affordable housing – up to 20% and likely to be shared ownership
- Lifetime Homes and wheelchair housing
- construction management
- highway works
- bus layover
- open space works
- river alteration works
- local employment
- public access
- open space maintenance
- mechanism for delivery of a mixed use scheme
- public art
- CCTV
- Travel Plan
- Design and Access Panel
- Renewable energy
- Site servicing and management
- Contribution to s.106 monitoring costs
- Financial contribution to town centre projects (works to the River Quaggy; a Waterlink Way fund; air quality monitoring; training for employment, Town Centre Manager)

**10.1.4** It is envisaged that the financial contribution of £500,000 would be allocated as follows:

- River Quaggy: £250,000
- Waterlink Way fund: £100,000
- Air quality monitoring: £50,000
- Training for employment: £50,000
- Lewisham Town Centre Manager: £50,000

## **11. CONCLUSION**

### **11.1 Lewisham Gateway**

**11.1.1** The current application promotes the comprehensive redevelopment of the Gateway site to provide a mixed use scheme that delivers on a number of the aspirations and objectives of the Urban Renaissance Lewisham SRB programme. Through discussions with representatives of the local community, liaison with bodies such as the GLA, LDA and TfL, and negotiations with the applicant the Council has secured a scheme and range of benefits that is considered to meet relevant planning policy set out in the development plan and other relevant documents including the Planning Brief for the site and which will bring major benefits to Lewisham Town Centre and the Borough.

**11.1.2** The planning application for the Gateway site raises a number of planning policy considerations which have been outlined and assessed in this report. The scale of the proposals are challenging, both in terms of the degree of change proposed to the built and natural environment in the area, and the

amount of development proposed and consequential built form which means the development will have impacts on the local environment and also be visible from further away. However the development is consistent with policy objectives for sustainable development, providing a high density mixed-use scheme close to a major transport interchange and incorporating an improved built and natural environment. It is considered that the balance is in favour of the proposed development which will deliver a major regeneration scheme that addresses a number of issues in Lewisham town centre that have underpinned current and emerging planning policy and funding bids in the area.

## **11.2 Implementation**

**11.2.1** Were planning permission to be granted for the current proposals, as a part detailed planning application permission would be granted for the highway infrastructure (including new bus layover) and river works and Block F (the 'Quaggy Café' building) on the eastern side of Lewisham High Street. These elements of the scheme could proceed ahead of the submission of reserved matters for the buildings on the site subject to:

- final agreement of materials for these elements of the scheme,
- submission and approval of a construction management plan to include a Code of Construction Practice: setting out steps to mitigate impacts from construction activity, including the routing of construction vehicles off site, and
- submission and agreement of a Design Framework for the site as a whole setting out the design principles and procurement strategy for the design of individual buildings

**11.2.2** For the buildings on the site (excluding the Quaggy Café) there are a number of submissions to be made by the applicant/developer and approvals obtained before commencement of development (or a phase of development). These are covered by condition and/or proposed legal agreement and enable the Council and other relevant agencies to inform, review and control the detailed form of the scheme. These include:

- Reserved matters and details of the scheme (including details of phasing of the development and mix of uses and floorspace within each development parcel and phase): to ensure the scheme is consistent with both the principles set out in the outline application and approved documents and remains within the parameters assessed in the ES.
- Open space: details of communal and/or private open space within the development parcels to ensure that there is adequate and appropriate open space for residential units on the site, together with a public realm management strategy to cover the maintenance and repair of un-built (i.e. roads, pavements and other public open spaces) within the site).

## **12. RECOMMENDATIONS**

### **12.1 RECOMMENDATION (A)**

To agree the principle of development and to refer the application and this report to The Mayor for London (Greater London Authority) under Article 4 of the Town and Country Planning (Mayor of London) Order 2000 (Categories 1A, 1C & 1B (c) of the Schedule thereto).

## **RECOMMENDATION (B)**

Subject to no direction being received from The Mayor for London, to refer the application to the Secretary of State for Communities and Local Government as a departure from the development plan (Town and Country Planning (Development Plans and Consultation) (Departures) Direction 1999) in respect of the loss of Metropolitan Open Land and under the Shopping Direction (Town and Country Planning (Shopping Development) (England and Wales) (No.2) Direction 1993) in respect of the retail floorspace proposed.

## **RECOMMENDATION (C)**

Subject to no direction being received from the Secretary of State for Communities and Local Government, authorise officers to negotiate a Section 106 Agreement to cover the following principal matters including such other amendments as considered appropriate to ensure the acceptable implementation of the development:

- affordable housing – up to 20% and likely to be shared ownership
- Lifetime Homes and wheelchair housing
- construction management
- highway works
- bus layover
- open space works
- river alteration works
- local employment
- public access
- open space maintenance
- mechanism for delivery of a mixed use scheme
- public art
- CCTV
- Travel Plan
- Design and Access Panel
- Renewable energy
- Site servicing and management
- Contribution to s.106 monitoring costs
- Financial contribution to town centre projects (works to the River Quaggy; a Waterlink Way fund; air quality monitoring; training for employment, Town Centre Manager)

## **RECOMMENDATION (D)**

Subject to the completion of a satisfactory Section 106 Agreement, authorise the Head of Planning to **GRANT PERMISSION** subject to conditions including those set out in Section 12.2 below and such amendments as considered appropriate to ensure the acceptable implementation of the development.

## **RECOMMENDATION (E)**

If the Committee resolve that planning permission be granted that the Committee: -

- (i) confirms that it has taken the environmental information into account as required by Regulation 3(2) of the Town and Country Planning (Environmental Impact Assessment) Regulations 1999 and

- (ii) agrees that following issue of the decision the Head of Planning should place a statement on the Statutory Register pursuant to Regulation 21 of the Town and Country Planning (Environmental Impact Assessment) Regulations 1999 containing the information required by Regulation 21 and that for the purposes of Regulation 21(1)(c) the main reasons and considerations on which the Committee's decision was based shall be as set out in this report.

## **12.2 Conditions**

Permission granted subject to the following conditions:-

### **Time Limit of Permission**

1. (a) Applications for approval of Reserved Matters must be made not later than the expiration of 5 years beginning with the date of the grant of this planning permission, and
- (b) The development to which this permission relates must be begun not later than:-
  - (i) The expiration of 5 years from the date of the grant of this outline planning permission, or
  - (ii) If later, the expiration of 2 years from the final approval of the Reserved Matters or, in the case of approval on different dates, the final approval of the last such matter to be approved

Reason

To comply with Section 92 of the Town and Country Planning Act 1990.

### **Reserved Matters/Details**

2. No Phase of the development shall be commenced until layouts, plans/sections, elevations and other supporting material for that Phase detailing:
  - i) siting of the buildings and other structures;
  - ii) design of the buildings (including floor areas, height and massing);
  - iii) external appearance (including samples of the materials and finishes to be used for all external surfaces and including but not limited to roofs, elevation treatment, glazing);
  - iv) landscaping of all public and other areas.

have been submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority, the development shall in all aspects be carried out in accordance with the details approved under this Condition 2.

Reason

In order that the local planning authority is satisfied with the details of the proposed development.

Note: The means of access are shown on drawing 13902/200/10/01 Rev P9 are approved under this permission, as are details of the siting, design and external appearance of Building Block F as shown on drawings PA-0001 Rev D and PA-0002 Rev A.

3. No Phase of the development shall be commenced until details of the following matters in respect of that Phase have been submitted to and approved in writing by the local planning authority:
- i) on-site vehicle servicing and parking;
  - ii) internal footpath layout, including all surface treatments;
  - iii) hard and soft landscaping and planting
  - iv) site boundary treatments
  - v) foul and surface water drainage, including on site and off site connections/improvements;

The development shall be carried out in accordance with the approved details.

**Reason**

In order that the local planning authority is satisfied with the details of the proposed development.

4. The Highway Infrastructure Works and River Alteration Works shall be in accordance with the scheme shown in drawings 13902/200/10/01 Rev P9, 13902/270/001 Rev P5, 13902/270/002 Rev P4, 13902/270/003 Rev P5, 13902/270/004 Rev P5 and 13902/270/005 Rev P5.

**Reason**

To ensure the satisfactory implementation of the planning permission.

5. The development (including demolition) shall not be commenced and no Reserved Matters applications shall be submitted until a Design Framework for the site containing the information required by the Design Framework Specification has been submitted to and approved in writing by the local planning authority. All Reserved Matters application shall accord with the approved Design Framework.

**Reason**

In order that the local planning authority is satisfied with the details of the proposed development.

6. No Phase of the development shall be commenced until full details of access arrangements within that Phase for people with disabilities have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details and, unless otherwise agreed in writing by the local planning authority, any works and other arrangements required by the approved details shall be carried out prior to occupation of any building within the relevant Phase.

**Reason**

To facilitate accessibility and movement by those with mobility difficulties and to comply with Policy URB 7 Access to Buildings for People with Disabilities in the adopted Unitary Development Plan (July 2004).

**Scheme Parameters**

7. The development shall be carried out in strict accordance with the Parameter Plans and all Reserved Matters application shall accord with the Parameter Plans.

**Reason**

In order to ensure that the development is carried out satisfactorily and accords with the parameters which have been subject to Environmental Impact Assessment.

### **Phasing**

8. The development (including demolition) shall not be commenced until details of the phasing of the development have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved phasing, unless otherwise agreed in writing by the local planning authority.

#### **Reason**

The local planning authority need to be satisfied that development of the site is undertaken in a coherent and comprehensive manner, and that the development takes place within a reasonable timescale for the benefit of future occupiers and other residents of the area.

### **Land Uses**

9. The total built floorspace for the development shall not exceed 100,000 square metres (Gross External Area) and the maximum permitted floorspace for each use granted by this permission shall be (all figures Gross External Area):
- up to 57,000 m<sup>2</sup> residential (C3)
  - up to 12,000 m<sup>2</sup> shops, financial & professional services (A1 & A2)
  - up to 17,500 m<sup>2</sup> offices (B1)/education(D1)
  - up to 5,000 m<sup>2</sup> leisure (D2)
  - up to 4,000 m<sup>2</sup> restaurants & cafés and drinking establishments (A3 & A4)
  - up to 3,000 m<sup>2</sup> hotel (C1)
  - up to 1,000 m<sup>2</sup> hot food takeaways (A5)
  - up to 500 m<sup>2</sup> health (D1)

#### **Reason**

The development of the site has been the subject of an Environmental Impact Assessment which has been taken into account by the local planning authority in determining the application and any alteration to the scheme content may have an impact which has not been assessed by that process.

10. Building Block F (which is permitted for Class A3/A4 use) may be used on a temporary basis as a marketing and business suite in relation to the marketing of the development (the 'temporary use'). The period of any such temporary use shall not exceed 3 years from the date of first occupation for such temporary use. At the end of such 3 year period the temporary use shall cease and thereafter, unless otherwise agreed in writing by the local planning authority (and subject to any requirement for planning permission), Building Block F shall not be used other than for Class A3 or A4 purposes.

Reason: to enable use of accommodation within the development in order to market the development

### **Restrictions on use**

11. Not more than 2,000m<sup>2</sup> (Gross External Area) shall be provided for Class A2 purposes, unless otherwise agreed in writing by the local planning authority.

#### **Reason**

In order to ensure the development contributes to improving the vitality and viability of the town centre as a major retail centre.

12. Not more than 1,500m<sup>2</sup> (Gross External Area) of the Class D2 floorspace shall be used for purposes other than a cinema unless otherwise agreed in writing by the local planning authority.

Reason

In order to ensure the development contributes to improving the vitality and viability of the town centre.

**Residential Amenity**

13. No part of the Class D1, D2, A1, A2, A3, A4, A5 or B1 floorspace provided within the development shall be open for customer business between the hours of 24.00 and 07.00, unless otherwise agreed in writing by the local planning authority.

Reason

To ensure that the proposed development does not prejudice the enjoyment of their properties by residents within the development and neighbouring occupiers and to comply with Policies ENV.PRO 11 Noise Generating Development, HSG 4 Residential Amenity and STC 9 Restaurants, A3 Uses and Take Away Hot Food Shops in the adopted Unitary Development Plan (July 2004).

14. Details of the design of the basement car-parking areas (including normal and emergency access/egress to/from them) within any Phase shall be submitted to and approved in writing by the local planning authority prior to the commencement of development within that Phase. Such details shall include ventilation of the basement areas, including the location of outlets and measures to attenuate noise and limit other airborne pollution to nearby sensitive receptors, particularly residents, to acceptable levels. The basement areas shall be constructed in accordance with the approved details. Unless otherwise agreed by the local planning authority in writing, each basement area shall be completed prior to occupation of the building of which it forms part.

Reason

To safeguard users and the amenities of occupiers of properties within the vicinity of the car-park area and to accord with Policy HSG 5 Layout and Design of New Residential Development in the adopted Unitary Development Plan (July 2004).

15. The rating level of the noise emitted from all fixed plant and premises shall be 10dB below the existing background level at any time, determined at the façade of any noise sensitive property. No Phase of the development shall be commenced until a scheme (accompanied by measurements and assessments in accordance with BS4142:1997) identifying how the rating level is to be achieved and subsequently maintained have been submitted to and approved in writing by the local planning authority. No Phase of the development shall be occupied until the approved mitigation measures have been carried out. Thereafter the mitigation measures shall be maintained in accordance with the approved scheme, unless otherwise agreed in writing by the local planning authority.

Reason

To safeguard the amenities of residents and other occupiers in and around the site and to comply with Policies HSG 4 Residential Amenity in the adopted

Unitary Development Plan (July 2004), and to ensure any impacts arising from the proposed development (and any measures required to mitigate those impacts) are consistent with those identified in the Environmental Statement accompanying the application.

16. No Phase of the development shall be commenced until a scheme for the insulation of residential units against external noise which scheme when implemented will result in noise levels not exceeding 30dB LAeq (night) for bedrooms and 35dB LAeq (day) for other habitable rooms (in each with windows shut and other means of ventilation provided), together with details in relation to the subsequent maintenance of such sound insulation scheme, have been submitted to and approved in writing by the local planning authority. No building shall be occupied until the approved sound insulation scheme has been implemented in its entirety in relation to that building. Thereafter, the sound insulation scheme shall be maintained in accordance with the approved scheme, unless otherwise agreed in writing with the local planning authority.

#### Reason

To safeguard the amenities of residents and to comply with Policy HSG 4 Residential Amenity in the adopted Unitary Development Plan (July 2004), and to ensure any impacts arising from the proposed development (and any measures required to mitigate those impacts) are consistent with those identified in the Environmental Statement accompanying the application.

#### **Residential amenity Space**

17. No Phase of the development shall be commenced until details of the configuration and extent of the provision of communal and/or private residential amenity space, including the provision of children's play space, within that Phase have been submitted to and approved in writing by the local planning authority. Such details shall also include a timetable for provision of such communal and/or private residential amenity space and children's play space by reference to levels of occupation of buildings within the Phase in question and unless otherwise agreed in writing by the local planning authority, the level of occupation as identified in the approved timetable shall not be exceeded until the communal and/or private residential amenity space associated with such building has been completed in accordance with the approved details.

#### Reason

In order to ensure the appropriate provision of communal and/or private residential open space and to comply with Policies HSG 5 Layout and Design of New Residential Development and HSG 7 Gardens in the adopted Unitary Development Plan (July 2004).

#### **Lighting**

18. No Phase of the development shall be commenced until full details of lighting and external illumination for that Phase have been submitted to and approved in writing by the local planning authority. Lighting design will comply with CIBSE LG6, code for lighting and BS5489. The details shall be accompanied by a programme for installation of the lighting and external illumination by reference to the occupation of buildings within the relevant Phase and, unless otherwise agreed in writing by the local planning authority, the level of occupation of any building as identified in the approved timetable shall not be exceeded until all relevant lighting and external illumination associated with such building has been installed in accordance with the approved details.



#### Reason

In order to safeguard the general amenities of the local area and to accord with Policies HSG 4 Residential Amenity and HSG 5 Layout and Design of New Residential Development in the adopted Unitary Development Plan (July 2004) and to control light pollution of the night sky.

#### **Microclimate**

19. The development (excluding Building Block F) shall be designed using the Lawson Criteria for Distress and Comfort as a guide to the appropriate minimum level of amenity that needs to be achieved and this shall be reflected in all Reserved Matters applications.

#### Reason

In order to ensure a suitable environment for visitors and residents and to accord with Policy HSG 5 Layout and Design of New Residential Development in the adopted Unitary Development Plan (July 2004) and to ensure that any environmental impacts of the development do not exceed those assessed and taken into account by the local planning authority when determining the planning application.

20. All applications for Reserved Matters pursuant to Condition 19 shall be accompanied by details (for approval) of the measures to achieve appropriate minimum levels of amenity. No part of the development shall be occupied until the approved measures have been carried out in relation to that part of the development in accordance with the approved details and shall be retained in situ in perpetuity unless otherwise agreed in writing by the local planning authority

#### Reason

In order to ensure a suitable environment for visitors and residents and to accord with Policy HSG 5 Layout and Design of New Residential Development in the adopted Unitary Development Plan (July 2004) and to ensure that any environmental impacts of the development do not exceed those assessed and taken into account by the local planning authority when determining the planning application.

#### **Movement**

21. Prior to commencement of any Phase of the development, a Parking Management Strategy setting out measures to control access to and the management of roads within that Phase shall be submitted to and approved in writing by the local planning authority. The measures set out in the approved Parking Management Strategy shall be implemented prior to occupation of the relevant Phase of the development and access and parking within the site shall be managed and enforced in accordance with the approved strategy.

#### Reason

In order to safeguard the amenities of adjoining residential areas in compliance with TRN 21 Traffic Management in the adopted Unitary Development Plan (July 2004). The development of the site is the subject of an Environmental Impact Assessment and any material alteration to the proposed uses may have an impact which has not been assessed by that process.]

22. The site shall be serviced by 10m rigid vehicles or smaller, and vehicles shall not enter the site between 0700 to 1000 hours and 1600 to 1900 hours, Monday to Friday.

Reason

In order to ensure the efficient operation of the road network in compliance with TRN 9 Shopping Areas in the adopted Unitary Development Plan (July 2004).

23. The detailed layout of all buildings at ground level shall be modelled and designed to ensure that the pavement width allows the free flow of pedestrians through the site and does not prejudice pedestrian safety. All Reserved Matters applications shall be accompanied by a statement demonstrating how the design accords with these requirements.

Reason

In order to ensure the safety and comfort of pedestrians

24. No Phase of the development shall be commenced until details of the provision for cycle parking for residents, visitors and people working on the site, including the numbers, type of cycle stands and their location for buildings within that Phase have been submitted to and approved in writing by the local planning authority. The cycle parking and cycle stands shall be provided in accordance with the approved details prior to occupation of the relevant building and shall be permanently retained for such purposes, unless otherwise agreed in writing by the local planning authority.

Reason

In order to ensure that an adequate provision is made for cycle users in accordance with the strategy submitted by the applicant and to accord with Policies TRN 14 Cycle Parking and TRN 15 Provision for Cyclists and Walkers in the adopted Unitary Development Plan (July 2004).

**Archaeology and Cultural Heritage**

25. Prior to commencement (including demolition) of any Phase of the development (including infrastructure works) the developer shall submit to the local planning authority for approval a strategy to afford access at all reasonable times to the site by archaeologist(s) nominated by the local planning authority and allow them to observe the excavations and record items of interest and finds.

Reason

In order to safeguard the archaeological assets of the site and to comply with Policy URB 21 Archaeology in the adopted Unitary Development Plan (July 2004).]

**Ecology**

26. No Phase of the development shall be commenced until details (including location, design, dimensions and materials) of green and brown roofs for that Phase have been submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority, the green and brown roofs required by this Condition shall be completed in accordance with the approved details prior to the occupation of the building of which they form part.

Reason

To ensure that the development is carried out in accordance with mitigation measures identified in the Environmental Statement and comply with Policy OS 13 Nature Conservation in the adopted Unitary Development Plan (July 2004).

## **Landscape**

27. Prior to the commencement of development within any Phase (excluding demolition works) a scheme for the landscape works within and treatment of the surroundings of that Phase (including both public and private areas of open space and, as appropriate, incorporating any noise impact mitigation measures) shall be submitted to and approved in writing by the local planning authority. Such a scheme shall include:

- a. the position and spread of all existing trees to be retained and/or removed;
- b. new tree and shrub planting including species, plant sizes and planting densities;
- c. means of planting, staking and tying of trees, including tree guards;
- d. areas of hard landscape works including paving and details, including samples, of proposed materials;
- e. details of the treatment of the external boundary of the site;
- f. details of how the proposed landscaping scheme will contribute to wildlife habitat;
- g. timescales for implementation; and
- h. a management plan for future maintenance of landscaped areas.

### **Reason**

To ensure a satisfactory development that enhances the visual amenity of the locality and to comply with Policies URB 3 Urban Design, URB 12 Landscape and Development in the adopted Unitary Development Plan (July 2004).

28. No part of the development shall be occupied until any planting, seeding or turfing for that part of the development included in the details approved under Condition 27 has been completed in accordance with the landscaping scheme and programme approved under Condition 27 Any trees shrubs plants or grassed areas which are removed or damaged, or which die or become diseased within 5 years following the date of planting shall be replaced within the next planting season with planting of similar species and size. Unless otherwise agreed in writing by the local planning authority, all landscaping shall be maintained in accordance with the landscaping scheme approved under Condition 27(h).

### **Reason**

To ensure a satisfactory appearance and setting for the proposed development and to ensure that it enhances the visual amenity of the area and to comply with Policies URB 3 Urban Design, URB 12 Landscape and Development in the adopted Unitary Development Plan (July 2004).

## **Construction: Code of Construction Practice**

29. The development (including demolition) shall not be commenced until details of a Code of Construction Practice and Construction Method Statement for the entire site and details specific to each Phase have been submitted to and approved in writing by the local planning authority.

### **Reason**

To limit the detrimental effect of demolition and construction works on adjoining residential occupiers by reason of noise and disturbance.

30. No Phase of the development shall be commenced until defined access routes to the site for all vehicular modes relating to the demolition and construction for that part of the development (including delivery of materials/removal of waste) have been submitted to and approved in writing by local planning authority for that part of the development. Such details shall be implemented in accordance with the approved details unless otherwise agreed in writing with the local planning authority.

**Reason**

To ensure the appropriate routing of construction traffic to safeguard the amenity of local residents and to ensure that the proposed development does not prejudice the free flow of traffic or the conditions of general safety along the neighbouring highway.

31. The development shall not be commenced until details of the use, handling or storage of any hazardous substances included in the Schedule to the Planning (Hazardous Substances) Regulations 1992 have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

**Reason**

To prevent pollution of the water environment.

**Hydrology and Water Resources**

32. The proposed measures set out in the Flood Risk Assessment submitted with the application shall be implemented in full prior to commencement of the relevant part of the development.

**Reason**

In order to ensure that appropriate flood attenuation measures are implemented in full and to safeguard occupiers of the site and surrounding areas.]

33. The development shall not be commenced until details of surface water source control measures for the development have been submitted to and approved in writing by the local planning authority. The development shall be implemented in strict accordance with the approved details, unless otherwise agreed in writing with the local planning authority.

**Reason**

To prevent pollution of the water environment and increased risk of flooding.

**Waste**

34. The development shall not be commenced until details of a site-wide Waste Strategy (including, without limitation, long term objectives, management responsibilities and measures for each Phase or part thereof) has been submitted to and approved in writing by the local planning authority. All measures for each Phase of the development shall be implemented in strict accordance with the approved Waste Strategy. No Phase of the development shall be commenced until the approved measures for any previous Phase have been completed. In the case of the final Phase of development, the approved measures shall be implemented within 12 months of completion, of that Phase, unless otherwise agreed in writing by the local planning authority.

**Reason**

To comply with Policy ENV.PRO 1 Waste in the adopted Unitary Development Plan (July 2004).]

### **Sustainability and Energy**

35. The development shall not be commenced until a site-wide Energy Strategy has been submitted to and approved in writing by the local planning authority. Reserved Matters applications for each Phase of the development shall include details of how the energy strategy and agreed development commitments will be secured for that Phase and shall be implemented in accordance with the approved scheme.

Reason

To ensure commitments made within the Outline Planning Energy Statement (June 2007) are implemented

36. Reserved Matters applications in respect of the design of relevant parts of the development or part thereof shall be accompanied by an Independent Sustainability Assessment in accordance with the Building Research Establishment guidelines, on an individual building or land-use basis. Residential properties within the development are to achieve at least an indicative Code for Sustainable Homes Level 3 rating and other buildings a BREAMM 'Very Good' rating (or equivalent) on these design stage assessments.

Reason

To provide an independent assessment of the standards of sustainable development to be achieved by the scheme.

37. Following completion of the relevant part of the development, a BRE "Post-Construction Review" shall be submitted on the elements of the scheme as built to ensure at least a Code for Sustainable Homes Level 3 rating was achieved for residential properties within the development and BREAMM 'Very Good' rating (or equivalent) for other buildings.

Reason

To ensure enforceability of conditions and obligations by verifying the standards and measures achieved on-site.]

#### *Informatives:*

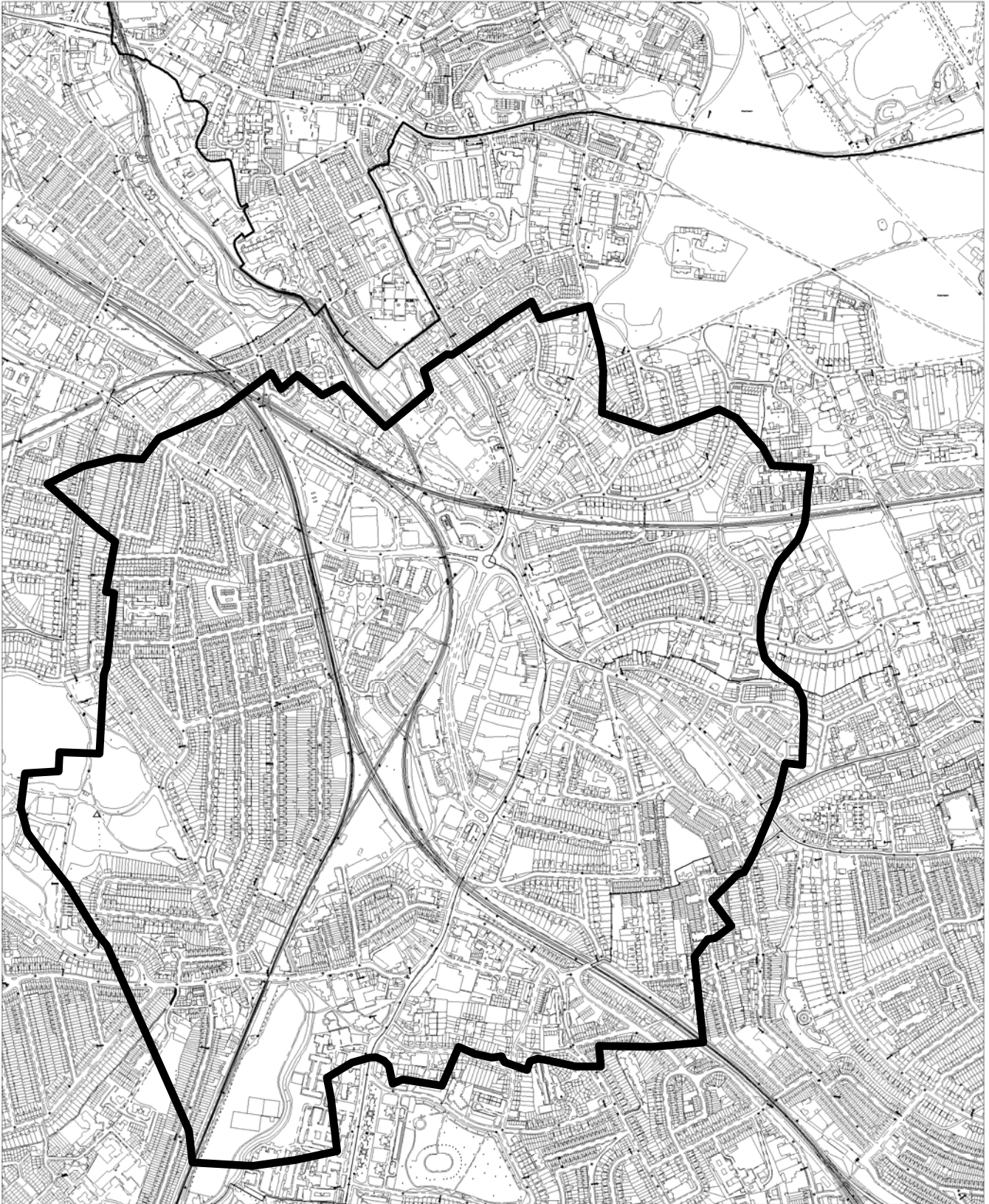
1. *Prior to the submission of reserved matters applications for buildings on the site incorporating residential units the applicant is advised to consult the local planning authority regarding options for the mitigation of noise conditions within the residential accommodation with the priority being to minimise the number of habitable rooms exposed to high noise levels.*
2. *The applicant is advised that details of the strategy for providing noise insulation grants to eligible properties should be submitted to the Council prior to the commencement of development.*
3. *The applicant is advised to consult with the Council's Environmental Health regarding measures to control construction impacts (Conditions xxx).*
4. *The Contractor is recommended to apply to the Council for Section 61 consents under the Control of Pollution 1974 for each separate phase of construction.*

*The application should be submitted well in advance of the works in order to allow Lewisham Environmental Health to give it due consideration within its statutory 28 day determination period. Where possible, a draft application should be submitted to the Local Authority to initiate discussions on the actual application.*

## **Definitions and interpretation**

- A. Where in this permission the following terms and expressions are used, they shall have the following meanings: -
- A1. “Class” means a use class as specified in the Town and Country Planning (Use Classes) Order 1987 (as amended);
- “Design Framework Specification” means the design framework specification annexed to this permission;
- “Environmental Statement” means the environmental statement prepared by Peter Brett Associates and submitted with the application in April 2006 together with the Environmental Statement Addendum submitted in July 2007;
- “Environmental Statement Addendum” means the Environmental Statement Addendum submitted in July 2007;
- “Parameter Plans” means the following drawings approved by this permission and setting the parameters for the development: - AA39175/OP-0002A, AA39175/OP-0003A, AA39175/OP-0004A, AA39175/OP-0005A, AA39175/OP-0006A, AA39175/OP-0007A, AA39175/OP-0008A;
- “Phase” means a phase of the development as approved by the local planning authority pursuant to Condition 6;
- “Reserved Matters” means the details required to be submitted to and approved by the local planning authority pursuant to Condition 2;
- A2. “Gross External Area” means gross external area as measured in accordance with the Royal Institution of Chartered Surveyors Code of Measuring Practice (Fifth Edition or any edition superseded it)
- A3. References to the site are references to the application site as shown on the approved site application drawing (13902-002/1.1)

Lewisham Gateway Consultation Area



Date: 22/08/07

Scale:10000  
Base on the  
Ordnance Survey map  
Licence no:LA075221  
London, SE6 4RU

## Comments on Lewisham Gateway

Note: Comments in *Italics* refer to comments were made by visitors to the LPA Exhibition

### 88 Adelaide Avenue

Concerned that the road system will not work and the scheme will worsen traffic. The objector also feels that the proposals to move the Quaggy and take away Charlottenburg Gardens will be detrimental to the environment. There must be other ways to improve the roundabout without damaging the area in a way that the proposed scheme will inevitably do.

### 6 Algernon Road

He objects as the site is not suitable for the density of development proposed along with the traffic and pollution problems the development will caused. The plans are not in keeping with London policy in terms of treatment of rivers, care in proposing high rise solutions, loss of green space, alignment of development plans and transport capacity etc. A very low proportion of the housing units are to be made available as affordable housing and he questions the suitability of the site for housing.

Also questions the business case for a mass of office space when there are large expanses of empty offices close by. The development is being driven by the developer's business/profit model. The changes to the road system have not been proven to improve the situation and it is possible that the new arrangements would make the situation significantly worse.

### 107 Algernon Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 204 Algernon Road

*Concerned whether the re-aligned Rennell Street will be long enough for the volume of bendy buses that will be travelling along it: concerned about blockage on the Low H (with traffic being directed to Greenwich, Lee Green and Catford);*



*any further widening of the Low H (to accommodate more vehicles could well lead to an even greater River Ravensbourne culvert.*

### 213 Algernon Road

The resident made some detailed comments about the planning application and was particularly concerned that the scheme relegated the pedestrian and felt that the sustainability section was very poor.

The application is inadequate in a number of respects and despite the multi volume format of the applications with consultancy annexes, the documents are insufficient to the task of enabling a clear description of this vast project.

The resident's key and enduring issue is being able to negotiate the area without being given inferior status or being expected to walk only to pre set public transport links to continue the journey. The private/public interface in respect of pedestrian desire lines is also a strong concern.

### 16 Belmont Hill

There is no proof that the road system will work and could well get worse. Opposed to moving the rivers and am appalled with the lack of affordable housing. He objects to the replacement of Metropolitan Open Land with a busy road and similarly the loss of Quaggy Gardens and supports QWAG's proposals. A scheme with more limited infrastructure costs is preferable and a high density scheme could then be focused southward from the roundabout, fully integrated with the existing mall. The present development vehicle could then partner with Land Securities.

### 20 Belmont Grove

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. Opposed to moving rivers, objects to anything that lowers air quality, is appalled at the lack of affordable housing, objects to the loss of Metropolitan Open Land, supported QWAGs proposals for the Quaggy and sees no business case for building more offices and retail units. A cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 54 Belmont Park

*The photomontage is all very well but they only give a suggestion of the mass involved. The final design might be totally different. The perspectives make one realise what a horrifying prospect is in store (Lewisham looking like Croydon). The Low H will take a long time to navigate. Concerned that the bus station will only be a larger version of the present system whereby the bus drivers sit at the bus station having their breaks whilst the passengers stand out in the rain. Not sure that the remodelling the river will not re-introduce the historic flooding*

*problem. We need to make sure that facilities are available in Lewisham for local people and especially facilities to encourage the young to get involved in sport and cultural activities. It is not clear from the plans whether there will be a new leisure centre, cinema, civic hall, theatre. To compare any scheme in Lewisham with St Christopher's Place is not appropriate; demographics are totally different.*

### 6 Bonfield Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. She is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 13 Boyne Road

The maximum height of the building is far too great in relation to the space available and the character of the surrounding area. 25 storeys is far too tall. The minimum height of around 15 storeys is also still too high and at least should be considered to be the maximum height. The development would lead to a cramped over built site, detracting from the appeal of the development and damaging the appeal of the existing residential, areas around it.

The quality of the new buildings looks aesthetically poor, just rectangular building of a type common in the 1960's and now seen to be detrimental. The earlier artist's impressions showed much more impressive buildings. Lewisham should have quality development, not an eyesore.

### 22 Boyne Road

A 20 storey block of flats will blight the area and £20 million pounds should be set aside for local affected residents. What is to stop residents to stop the development due to "right of light" law. Money should be set aside to fund possible court cases. Artist impressions are totally misleading showing 13 storeys when 20 are intended. The buildings will be much closer together and more intimidating. The sun will be blocked by the buildings apart from sunset. The development will be a blot on the landscape and would be aesthetically ugly and may make Lewisham famous on how not to build skylines. High rise, high density accommodation has many social problems. Parking is not sufficient. Parking around the centre is already too limited. 1 parking space per flat needs to be allocated and offering only 20% of units as affordable appears like bribery. People living near (in the shadow of this development) will be blighted and St Stephens Church will be obscured by the development. Re-routing the roads would not be able to handle the same amount of traffic.

### 35 Boyne Road

The provision of 500 car parking spaces seems excessive. Public transport is very good and to increase car parking will aggravate the already congested Lewisham Town Centre.

### 43 Boyne Road

Response on behalf of the Greenwich and Lewisham Friends of the Earth. Welcome a mixed urban development in principle and approve of the Council's commitment to high environmental standards and want to ensure that this is delivered in the development. The main areas of concerns are transport with concerns about the number of parking spaces. Suggests a car free scheme should be considered and that cycles need the same priority as pedestrians and buses with cycle lanes and a cycle park. The buildings should be highly energy efficient through the use of on site renewables to try to achieve a carbon neutral development. Sound insulation needs to be of a high standard in noisy environment and roof planting needs to be guaranteed. Rain water and grey water should be harvested. Not convinced that issues of sunlight and wind in Confluence Park have been adequately addressed and the sunlight studies are of poor quality. Air quality needs to be safeguarded and permanently monitored. A proper waste strategy is needed.

### 90 Breakspears Road

There is no proof that the amended road system will improve traffic and the resident fears that traffic will get worse. He is also opposed to moving rivers, to anything that reduces air quality, is appalled about the lack of affordable housing, objects to the loss of Metropolitan Open Land and can see no business case for ore offices and retail units.

He complains about not having been consulted (laughable) and the scheme is typically totalitarian architecture, typical of the people stacks in Romania.

### 95 Breakspears Road

There is no proof that the amended road system will improve traffic and the resident fears that traffic will get worse. He is also opposed to moving rivers, to anything that reduces air quality, is appalled about the lack of affordable housing, objects to the loss of Metropolitan Open Land and can see no business case for more offices and retail units.

### 101 Breakspears Road

There is no proof that the amended road system will improve traffic and the resident fears that traffic will get worse. He is also opposed to moving rivers, to anything that reduces air quality, is appalled about the lack of affordable housing, objects to the loss of Metropolitan Open Land and can see no business case for

more offices and retail units. Supports QWAGs proposals and feels that a cheaper scheme would be more appropriate to replace the roundabout.

He does not use Lewisham as he finds it a depressing area and injurious to ones health. The scheme would ensure that he would never use the facilities.

### 7 Brightfield Road

The high rise buildings would be a blot on the landscape and the development would cause congestion, pollution and the loss of green space.

### 9 Brockley View

The current proposals do not allow adequate space to re-engineer and to restore the River Quaggy. The project should avoid culverting. To widen the Quaggy would reflect the Council's role in promoting biodiversity. It will also reflect the views of people following public consultation.

The development should utilise environmentally friendly materials (target for legal sustainable timber) Demolition should involve a waste management plan

This huge project should be required to demonstrate exemplar energy efficiency and renewable energy.

### 67 Brookbank Road

There is no proof that the amended road system will improve traffic and the resident fears that traffic will get worse. He is also opposed to moving rivers, to anything that reduces air quality, is appalled about the lack of affordable housing, objects to the loss of Metropolitan Open Land and can see no business case for ore offices and retail units.

The housing would be quite dense and will be bad for the people moving in and living nearby. Offering the flats to key works is no solution as they usually have families. Would be better to have a low rise mixed development including houses with gardens for families (which could also include the travellers site)

### 71 Brookbank Road

There is no proof that the amended road system will improve traffic and the resident fears that traffic will get worse. He is also opposed to moving rivers, to anything that reduces air quality, is appalled about the lack of affordable housing, objects to the loss of Metropolitan Open Land and can see no business case for more offices and retail units. Supports QWAGs proposals and feels that a cheaper scheme would be more appropriate to replace the roundabout.

### 83 Brookbank Road

As an architect and local resident, considers that the scale of development is totally alien to the surrounding area, the buildings blight distant views, the architecture is banal in the extreme, the development will most likely result in further traffic congestion and will be ultimately be detrimental to the environment.

### 88 Brookbank Road

Resident is most concerned that the proposed development would make Lewisham worse. With lack of secondary school provision for children, one has to doubt whether we can make Lewisham home.

The green areas that used to be enjoyed (Sundermead) have been much reduced and the gateway proposals will reduce them further. Building on every spare piece of land reduces green space and increases environmental damage.

From Brookbank Road one can see trees and the Lewisham Centre (and is a pleasant view). The view is to be completely changed and not for the better. Citibank will be joined by other blocks (in a glass haze).

There is currently no shortage of shops and eating facilities. The market is special within Lewisham and the development will turn the centre into yet another shopping mall. We already have Canary Wharf and Bromley has excellent shopping facilities nearby. Bluewater is not far off and we have access to Oxford Street. Surely it is best to build on Lewisham's strengths.

Buildings will make a huge environmental impact. And there is no thought of sustainability – with current water problems.

More shops will increase traffic congestion. The plans are short-term and they do not consider quality of life and environmental impact. Living in Lewisham can already be a noisy and dusty existence. The plans seem likely to make it worse.

### 23 Caterham Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. She is opposed to moving rivers, objects to anything that lowers air quality, is appalled at the lack of affordable housing, objects to the loss of Metropolitan Open Land, supported QWAGs proposals for the Quaggy and sees no business case for building more offices and retail units. The town centre is not the place for high rise housing and should be a place where residents can shop in safety and ideally at quality nationally known stores. A cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way. The Borough has a number of conservation areas close to the development and nothing will enhance the local environment and will have a detrimental impact on the area as a whole.

### 25 Caterham Road

This resident expresses concern over the proposed new roads – no further details but wants to be kept advised of any meetings and consultations that take place.

A later email formally objects to the proposals. They are concerned about the height and design of the blocks which are too high. The site is next to a conservation area. The police station was changed on a number of occasions to ensure that it blended in with the existing surrounding architecture. The police station eventually gained the support of most people.

The traffic will increase as a result of the development (residents accessing the basement car park and businesses servicing their units). Lockmead Road in particular will become gridlocked. No additional trains will be provided and the transport system will become a nightmare. Increased busses will create further congestion. Insufficient parking for future residents and there will be further parking pressure placed on surrounding roads.

The loss of sunlight will blight the landscape for local residents in Caterham Road, Boyne Road amongst many others. The impact of the development on those suffering from asthma will be significant.

There will be hardly any green spaces as part of the development. The green roofs will only be accessible for residents of the development. Increased traffic would increase noise disturbance. Would like to see more modest improvements, ideally one that encapsulates the wishes of residents and businesses and not grand ideas of developers.

### 14 Chestnut House, Brockley

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. She is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 6 Church Grove

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and

can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 18 Church Grove

The resident is not convinced that the improvements in pedestrian access to the new development from Lewisham Station, stands up to scrutiny. Pedestrians currently have to wait to cross the roundabout (with the sequencing of traffic lights). The overall effect is to privilege traffic over people to a degree that is unacceptable in the major shopping and transport hub.

The new scheme replicates the problem with a main arterial road passing through a commercial and entertainment area. And pedestrians would be required to fight with the traffic. Resident is particularly intrigued about the new crossing at Rennell Street. Assuming that this crossing would be subject to the same problems of unfavourable traffic sequencing with consequent frustrating delays, this will encourage reckless pedestrians to risk personal safety.

Main tower blocks are extremely high and will dominate the view from a number of directions. Cramping so much on the site may act against the aesthetics of the development.

The small park will be dominated by tall buildings which will cast shade over large chunks of the park during the day and will make it difficult to enjoy. The space will become litter ridden and poorly used.

Please do not give us 20 storeys or anything so ugly.

### 5 Claybank Grove SE13

*Plans are a good idea. Lewisham needs new ideas. Lived in Lewisham for 20 years and will be happy to see the change. It will be good for parents and children to have something to do after work (wine bars, restaurant, new shops and cinema).*

### 8 Cliffview Road

Third party supports QWAG's argument for an additional 4 metre strip for the Quaggy and the adjustment of the road alignment. The river can then be a natural resource that people can interact with. Rather than receiving token treatment. Such an adjustment should be able to take place (bearing in mind the size of the proposed development) without affecting profitability. A successful public realm (and good shops) is what will make the scheme work and attract shoppers away from Bromley etc.

Is not convinced that Lewisham will not become a bottleneck, forcing traffic to rat run through Brockley and surrounding areas

Is concerned about loss of MOL and wonders whether the loss is compensated for in the new scheme

St Stephen's Church is a local landmark and it will be overshadowed and views of it will be obscured from a wide range of view points. Whilst appreciating that St Stephen's Square considers the church setting, these other views are just as important.

The 2002 consultation on the road alignment made no clear reference to the scale of the development and focussed instead on the road alignment. The local agreement was on the basis of the road alignment and not on the scale/massing of the scheme or the visual impact of the scheme on Lewisham Town Centre. There should have been more events and pre application consultation on the massing, backed up by door to door mail shots.

### 15 Cliffview Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. She is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings. She is appalled by the misleading information distributed by the Council about the scheme and the lack of actual information about how the buildings will look and how high they really will be. Is opposed to reductions of air quality (especially with the number of additional cars attracted to the area) and is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. She believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 18 Cliffview Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. She is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 36 Cliffview Road

This resident is against high rise development which does not reflect the character of low rise Lewisham. The lack of respect for the surrounding urban fabric is immense. We will be able to see this development from our parks and from surrounding residential areas.



Resident saw no assessment of the impact of the development on the rest of Lewisham. The glossy pamphlet looks more likely to attract high rents and in turn the usual suspects in chain stores. Resident is concerned that it will detract from usual custom in the existing High Street. There are already long term vacancies in Lewisham which indicates the difficulties of attracting retailers. There will be a two tier Lewisham.

Welcomes the principle of opening up the Quaggy and Ravensbourne, but this will be spoilt by the excessively high buildings in this very urban setting. Whilst some effort has been made to increase light into the area, the area will still be overshadowed by the high building.

Although the resident lives within walking distance of Lewisham, what could be a smart local shopping area in Ladywell is being neglected. An integrated approach for all of Lewisham is what is required.

The rivers appear to be opened up, only to be forced back into culverts when the road crosses. Not quite the “sensitive response to the environment” as stated in the report.

Thinks a public inquiry is required to assess the social and environmental impact of the project.

Although the resident welcomes the principle of linking Lewisham Station to the town centre and to improve the rivers and revitalise Lewisham, the development should flow from the scale of the existing shopping centre. The clear vision is one of high density, which in turn means high profitability rather than a sensitive response to the environment and local needs. If I wanted to live with a high rise development on my doorstep, I would move to Croydon.

#### 11 Corner Green

She hopes that the Council will support the QWAG initiative to make the Quaggy an important part of the development and move the new road 4 metres away from the Quaggy. Watersides are an important part of such developments such as Lakeside and Bluewater.

#### 46 Courthill Road

The plans are neither useful or beneficial to the people of Lewisham or the surrounding area for the reasons that have been set out in the ‘Lewisham Gateway fact sheet’ (copy of fact sheet not provided).

#### 49 Cranfield Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. Opposed to moving rivers, objects to anything that lowers air quality, is appalled at the lack of affordable housing, objects to the loss of Metropolitan Open Land,

supported QWAGs proposals for the Quaggy and sees no business case for building more offices and retail units. A cheaper scheme for replacing the round

### 37 Cressingham Road

The Citibank Building blocks Digital TV reception (might be the same for the new development and needs to be considered). Also have trees running alongside the river should remain.

### 43 Chessingham Road

*Density far too high: not enough parking for new properties (totally opposed)*

### 38 Chudleigh Road

Advertising of the proposal so far is full of claims and contradictions with the swimming baths referred to as the site for a new school. Opposed to high rise flats, road layout and loss of green space. There should be an open forum for consultation with people in the Borough and their opinions sought.

### 53 Crofton Gateway

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. She is opposed to moving rivers, objects to anything that lowers air quality, objects to the loss of Metropolitan Open Land, supported QWAGs proposals for the Quaggy and sees no business case for building more offices and retail units. A cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 18 Dartmouth Court, Dartmouth Grove

The new mini roundabout at the bottom of Lewisham Hill, along with the large number of new dwellings will exacerbate congestion in Wat Tyler Road, The impact on congestion in neighbouring roads does not seem to have been assessed.

Existing trains are overcrowded and can find no mention of how the additional flats will impact on trains. It is unreasonable to make play of the close proximity to the station when the trains are already congested.

Shocked that the building will be up to 77 metres in height which seems highly inappropriate. 3/5 storeys would be more appropriate and in keeping with the development in Lewisham. It would dwarf all neighbouring residences, the existing Lewisham High Street and the shopping centre.

### 301 Indiana Building, Deals Gateway (two letters – slight difference between them)

This residents shops in Lewisham and finds it a drag when she cannot walk directly to the High Street and must negotiate a number of crossings. Also horrified that the Quaggy is not going to be restored but is to be hemmed in and the Ravensbourne buried. Please ensure that the road is 4 metres away from the Quaggy.

### 170 Deptford High Street

Whilst the siting of buildings has shown some regard to the remaining urban fabric of the centre, the nature of the massing does not. The site will be over developed with a mass of high rise buildings that will have no empathy with the existing character of Lewisham. It will therefore have a negative impact not just as you arrive in the centre, but from surrounding areas.

The dense development appears to overshadow the new open spaces and rivers. This is the one opportunity in 100 years to give the Quaggy and Ravensbourne a new lease of life. Yet the Ravensbourne will still be culverted and both rivers would be dwarfed by high rise development.

The development has a strong reliance on retail and offices. As there are already unrented retail and office space, I am worried that the success will depend on a currently over supplied market. We need sustained revitalisation including jobs with prospects that are not so dependant on uncertain financial trends.

### 2 Delacourt Road

The roundabout was only put in place some 10 Years ago. Why is it that this investment is to be substantially abandoned, with further infrastructure, cost and disruption. Other solutions should be investigated. A simple yet radical review of all development options is required. Questions whether the existing market will be enhanced by the current strategy. Any development should be sustainable from an energy perspective. There is very limited provision for youth in the centre and youth loyalty is fundamental to the perception of safety and future viability of any town centre. There is much that is technically, commercially and environmentally wrong with the proposed development (as well as imagination). Is worried that the Council owned asset is being wasted on highway and below ground services. He is not against the density of investment, merely the way it is being done. The H format of the road layout should not be implicit in any approval.

### 112 Doggett Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a

cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 33B Dundall Road SE4

*The road between Molesworth Street and Lewisham High Street will be a bottleneck. Restaurants and a cinema are desperately needed. Pedestrian access is great but don't create a "no go" zone when it is dark and the shops are shut. The open spaces should be good, especially with the development of the waterways, but try to design out vandalism and graffiti. Needs to be good visibility from the roads to reduce crime.*

### 18 Eliot Park

Development is ill-conceived and doesn't represent a solution for better traffic, communications and facilities. Does not see the point of building more offices in this area. This part of Lewisham needs a 'facelift' but this scheme is too large scale and would spoil an area that operates efficiently at present. Moving the river is not a good idea and does not like the high rise building. Objects to the replacement of MOL with a busy road and supports QWAG's proposals. The scheme blights the area and low rise development is far more effective in terms of noise, appearance and pollution.

### 88 Embleton Road

The resident is not happy that the plan offers sufficient improvement or green space alongside the Quaggy. She would like the road moved 4 metres away from the Quaggy in a green corridor that pedestrians can enjoy.

### 93 Embleton Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. She is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 94 Embleton Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the

replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 108 Embleton Road SE13

Objects to the proposals, especially as the amount of green space will be greatly reduced from its current ungenerous level. The plans reveal an intention to reduce still further the Rivers Quaggy and Ravensbourne as visible features. These rivers are almost to be invisible instead of forming an important part of a central park feature.

Is concerned about the height and mass of drawings and especially lack of detail covering such matters. The developer is seeking approval of the whole, expecting ratepayers to take it on trust that tier Council will oversee an attractive and vibrant town centre of which they can be proud.

Without at least some idea of what the scheme will look like in three dimensions, it is impossible to expect any kind of national judgement by the public of its desirability. All that one can say is that the ground cover fails to impress. The paucity of the information tends to confirm one's worst fears.

### 138 Erlanger Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. She believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 28 and 69 Ermine Road

People are concerned about building heights, the loss of open space and culverting the rivers, the loss of local identity and the treat to the current market traders and small shops. General bemusement about hoe traffic will flow through the realigned road and how buses will get to the new station. Everyone agrees that something needed at the roundabout, but loss of other amenities through the sheer scale of the proposed plans seems unnecessary as a means to achieve change.

### 26 Ermine Road

Email just saying that he objects to the Gateway Development

## 28 Ermine Road

There are no stated employment gains associated with the revitalisation proposals. Additional work will either be temporary and low waged. There is already 18% vacancy in existing offices.

Is concerned that there is no analysis of the impact of the development of the remainder of Lewisham. The scheme will attract shoppers from the rest of the High Street which currently includes small shops as well as market traders. The existing precinct already has longstanding vacant units. Only large chains will be able to afford the rents.

Ladywell will probably suffer still worsening decay. The unique corners court and the old Ladywell pool could well be upgraded with the old pool finding an alternative use.

Uncertain that the development will attract people to live in Lewisham, bearing in mind that the East London line will move the centre of residential interest to Crofton Park and Honor Oak. With ugly skyscrapers, Lewisham will not be able to compete. 20% affordable housing provision is inadequate given Lewisham's housing needs. Will the remaining 80% want to buy in a high rise development in the centre of a roundabout?

The plan will have a big impact on Brookbank Road and Ellerdale Road. There is a feeling that the new town centre will weaken the attractiveness of the area and might even prompt people to move

There is no increased education provision. Lewisham College could move into the vacant Citibank building. The promised leisure facility would not be needed if Ladywell pool was maintained and its facilities resourced.

There is a strong risk that the scheme will become a city desert with underutilised shopping facilities and a sink residential estate. There is also a strong risk that the scheme will actually have a detrimental effect on economic development within Lewisham.

The use of vaster areas of Lewisham to control traffic is flawed and there is likely to be a build up of traffic at the exits. The flow of traffic is likely to be very congested around the station. High rise development will have a very bad environmental impact, blocking views, especially in the Brookbank area, creating winds round the surrounding area, throwing it into shadow.

The cost of the scheme seems unrealistic with it likely to go way over budget. Will the scheme attract more of Lewisham's resources than has been budgeted for.

Concerned about consultation, with only people in a small radius round the town centre having been consulted.

An additional letter was received of 43 pages raising a series of concerns about the scheme under sections relating to the regenerative impacts and transport capacity being unproven, impact on retail economy, flooding, vehicular circulation, the pedestrian experience, degradation of the river environment, the site being unsuited for the development, outline application for tall buildings, loss of MOL and green space, housing provision, noise levels, deterioration of air quality, sunlight and daylight reduction, wind turbulence, negative impact on 4 conservation areas and Grade II listed building, local views, site of archaeological importance damaged, the destruction of existing community links, carbon footprint and misleading and biased consultation. A summary of the document (as provided by the group) outlines their views below:

1. We are critical of the piecemeal and fragmented nature of the 'planning' of developments around the Lewisham Gateway area. We assert that planning permission for Lewisham Gateway should be refused pending a full consultation on the Area Action Plan and sequential and cumulative tests of the transport, retail and flood impacts of all the developments that are either proposed or have recently been granted planning permission
2. The Lewisham Gateway application itself fails to meet critical aims of the Development Brief, with regards to vehicular circulation, creating a pleasant pedestrian experience and improving the rivers. It can be shown that the scheme will degrade and worsen all three.
3. The scheme fails to comply with guidance on: the need to submit a detailed planning application for tall buildings, removal of Metropolitan Open Land, increasing noise levels, breaching air quality standards, breaching standards for daylight, and breaching guidance on the level of affordable housing.
4. There are further grounds for strongly resisting this development, especially wind turbulence rendering certain areas unfit for their intended purpose, the degradation of the character and setting of no fewer than four conservation areas, overshadowing of a listed building, interference with local views, ploughing up of a major archaeological site, the destruction of community links surrounding the development.
5. The application seeks to justify this array of negative impacts with claimed "regenerative" benefits. These are entirely unproven and speculative: job creation cited is based on incorrect figures; assured provision to adequately meet the needs of Lewisham residents for affordable housing is non-existent; there is no business case for building office space; additional retail outlets will compete with the existing centre and there are no assured cultural amenities.
6. We therefore conclude that the area is particularly unsuited for this development, as the expense involved in creating the site and the consequent marginal viability of the scheme limits any social or cultural benefits for existing residents.
7. We have been disturbed by the misleading statements and pictures published by Lewisham Council and Lewisham Gateway Development Ltd. Consultation to date has left local residents unaware of the scale and

impact of this development. We would hope that further consultation will rectify this situation.

In conclusion we would propose an alternative approach: Lewisham should resist the pressure to become yet another example of 'Clone Town Britain', but strive instead to be a beacon for imaginative, environmentally- and people- friendly revival, with waterway paths, increased green space, cycle paths and consideration of investment in DLR and tramlink extensions.

### 34 Ermine Road

Against high rise residential development in the middle of a traffic island. If the area does not attract new businesses, the area will become a sink estate and drag Lewisham down, not revitalise it. Appalled that the development would create an urban desert, blocking open and historic views. There are still many interesting elements in Lewisham and this scheme will destroy what is left.

Concerned about additional office space when Citibank is empty. There is no proven need for this and there is no point spending millions on creating it.

Lewisham needs more housing but only 20% of the proposed housing is affordable. Would more affluent people want to live in the scheme, especially in the middle of an ugly town centre. The traffic island will be turned into a poor mans Croydon. Will not reduce traffic and will further ensure its build up. Unlike Croydon, there appears to be no provision made for handling traffic at the exits. Traffic islands were popular a few years ago but not now.

### 42 Ermine Road

Objects to the proposals.

The building scale would work against the stated objects of the development. They would not blend into the landscape. Lewisham is built in a basin with the historic sides of the basin (Blackheath, Hillyfields and Mountsfield Park). There is a general sense of open views and space across the basin. The proposed buildings will block the views currently enjoyed by thousand of Borough residents. It will also cast shadows to put whole estates in shade. This will reduce house values and will make the Borough less attractive. It will encourage the more well off to move out of the area, defeating the main aims of the development (to keep money within the Borough).

This scheme will fail to meet the Councils policy to ensure that high density schemes will be expected to demonstrate good quality design in keeping with the character of the area. The proposal fails on all counts. The character is two storey terraced houses. The public transport does not have the capacity to deal with the additional population.

The scheme will require people to live in the middle of a traffic roundabout. And away from open spaces large enough to support the recreational needs of the



proposed 2,000 new residents. The new Cornmill gardens will be busy supporting the needs of the Sundermead Estate.

The flats would be inappropriate if any of the residents have children or find that they need to drive to work. The only people who are suited to this accommodation are the unemployed. Very concerned about the lack of affordable housing (it could be 0% - as the document says up to 20%) The 1960's housing experiments have not worked

The work has not assessed whether SE Trains have the capacity to accommodate another 2,000 commuters. There is no facility to lengthen platforms and the trains are already running over capacity.

Lewisham does not need more retail space. The Riverdale has a number of empty shops and this is not the time to increase retail space but to get existing space back into use. This is an attempt to turn Lewisham into Croydon.

Urges the Council to consider changing the road layout and leaving the area as a pleasant open space, to make sure that the junction works (before re-developing the remaining area. The existing roundabout was only provided some 15 years ago and has failed.

Unhappy with some of the images produced to depict the design of the blocks. Models should be provided and before and after pictures. Residents will have permanently blighted views (eg Brookbank and Ellerdale Road).

The wealthy parts of London are those with open space (Kensington, Holland Park, Hampstead and Greenwich) Creating an open space to welcome people into the Borough can only enhance the experience of coming to the Borough. A park in Central Lewisham will be a brave planning decision that future residents will be grateful for.

#### 69 Ermine Road (2 letters)

Resident states that the buildings would be too tall and would change the local landscape. The skyline and trees of Blackheath would be blocked by tall buildings which will be an eyesore. The Citibank building is hated and many would like to see it demolished and it seems absurd and misguided to add to it with similar big blocks. Many residents are shocked by its height. Turning Lewisham into a mini Croydon will be detrimental to the reputation of the area.

Residents is also concerned about the prospect of 500 car parking spaces. The scheme should encourage use of public transport rather than welcoming further cars into the area. Increased pollution and danger to pedestrians will be caused by these additional cars.

Residents Is also concerned about concreting over part of the Quaggy which will be a serious loss of amenity.

A petition has been submitted sent in by residents of 28 and 69 Ermine Road.

69 Ermine Road (cc of letter to CABE)

This letter refers to the CABE letters and questions certain elements and requests a "more thorough assessment of the scheme."

The letter picks up on the CABE comments on Confluence Place and especially that the space will be overshadowed by high buildings and will be windy. They also make reference to the loss of MOL and they state that the existing green spaces are not parks but valued as green areas which can be seen from far around, giving a sense of openness.

They also make reference to CABE's suggestion to re-orientate St Stephen's Square (which might make the Church more linked to the proposals). They also argue that this might also improve the relationship between the proposals and the existing street market.

As regards conservation area impact, they argue that the lower scale development on the east side of Lewisham High Street would lose the current sense of openness and would be overshadowed by tower blocks, completely out of keeping with existing buildings. They refer to CABE's Guidance on Tall Buildings which states that

"Applicants seeking planning permission for tall buildings should ensure therefore that the following criteria and fully addressed;

ii) The effect on the whole existing environment, including the need to ensure that the proposal will conserve, or not damage or detract from listed buildings and their settings including the foregrounds and backgrounds to landmark buildings, conservation areas and their settings."

The letter then links their concerns on transport capacity to the CABE's Criteria for Evaluation (4.6 iii). The letter argues that LGD gives no capacity for extra cars, trains or buses. It then goes on about lack of additional capacity proposed for Lewisham station. They criticise that the development will only maintain the status quo and takes no account of the additional 500 car parking spaces .

They also question whether design quality will be realised and question whether an outline application is appropriate, especially when CABE advises that "Proposals for tall buildings should not be supported unless it can be demonstrated through the submission of fully worked up proposals that they are of the highest architectural quality. For this reason neither CABE nor English Heritage consider that outline applications would be appropriate."

Their letter submits before and after images (not totally accurate, especially a view across the existing roundabout). They state that they would rather see the demolition of the Citibank building (loathed by most Lewisham residents) than it being joined by other tall buildings.

They have requested a response from CABE and have copied the letter to the London Mayor and English Heritage.

#### 69 Ermine Road (cc of letter of response to CABE)

They feel that the failure of CABE to review the Lewisham Gateway proposals again would 'shortchange' the people of Lewisham and the Council. They make reference to a 'strong connection' between Arup and CABE and feel that the initial letter to Arup was congratulatory and written as if close friends. They feel that CABE's guidance on tall buildings has been ignored and the development would change Lewisham forever. They request an unbiased report from CABE about the scheme.

#### 75 Ermine Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. She is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings. She is concerned about extensive build programme and the loss of trees and open spaces. Saplings will take years to become established. Is opposed to reductions of air quality (especially with the number of additional cars attracted to the area) and is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. She believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way. The artists impressions are just glossy brochures and the reality will be windswept alleyways, darkened by lack of sunlight.

#### 79 Ermine Road

*The family are appalled at the Lewisham Gateway proposals. Lewisham will become completely characterless, dominated by tall buildings (completely unnecessary). It would be like another Croydon or worst, a mini Canary Wharf. The scheme will transform a landscape of low level buildings with a green leafy aspect into stone and brick.*

#### 90 Ermine Road

Resident agrees with the arguments put forward by residents against Lewisham Gateway. She is particularly concerned about the chaos and transport difficulties over the 5 years disruption and so many people living in the town centre will need careful thought in terms of transport, parking schools etc.

#### 91A Ermine Road

The huge tower blocks will be an eyesore and will not enhance the look of the town centre. Massive tower blocks are quite inappropriate. There are many nice

old buildings in Lewisham (close to St Stephens Church) and is disturbed at the effect the plan will have on such areas and on residential areas such as Brookbank Road/Ellerdale Road and Belmont Hill. Only 20% of properties will be affordable and the accommodation will not be suitable for families with children.

He has heard that the proposals will be detrimental to Lewisham market. The loss of forced removal of the market would be a tragedy.

Not against the development per se, but it will do nothing for the people of Lewisham. High rise living has previously been discredited. I have suspicions that commercial interests have the upper hand.

#### 8 Fossil Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 12 Fossil Road

The resident is concerned about the height of development which should be no higher than the height of the multi storey car park in the Lewisham Centre. He is also concerned about the demolition of the existing buildings opposite St Stephen's Church and feels that they should be incorporated into the new development.

Feels that the scheme should take full account of the views from Hillyfields.

Also feels that all riverbanks should be accessible on foot and by bicycle. They should be walkable from Catford to Lee Green and should tie in with the existing Green Chain network.

The 57,000 sq ft of residential, concentrated in such a small area, is not sustainable in terms of impact on local public transport facilities, the increased amount of car borne traffic and the impact of utilities and other public services. There is also not enough green spaces and gardens to make it a pleasant place to live. Will be more like a concrete jungle.

Sundermead is already making demands on green open space that is not currently being planned for and the volume of residential space would further create demand for additional green open space in Lewisham.

A further letter (following the local meeting) confirms that he is opposed to the development. The development plan is a missed opportunity. There is no vision other than a high rise housing estate and the road scheme. The only gateway on offer is a handsome profit for the developer. The rivers are the key to the Gateway. They need to be opened up and made accessible along their entire length.

### 21 Fossil Road

Objector is appalled at the extent of the plans to redevelop Lewisham Town Centre. The development is too large and unsympathetic to the local environment and communities that will be affected. There has been a deliberate attempt to avoid involving the public – artists' impressions are deliberately confusing. Concerned that Fossil Road was not included in the consultation exercise. There will be a loss of greenness, as one views the roundabout towards the trees. The Low H will not improve traffic circulation, which already suffers from a build up of traffic.

Why do we need to have so much emphasis on bringing people into Lewisham, when our current transport options cannot cope with the existing situation (crowded buses and DLR). Rail services are extremely crowded during the rush hour (overcrowded and dangerous). More accommodation means more cars and hence more pressure on parking and local roads.

Lewisham is a green suburb – should not spoil it to create a concrete jungle with a few very contrived green spaces. Originally happy to build on brownfield land but now developer and Government allows development of land that goes well beyond the brownfield and builds on previously tree covered sites and grassland.

There are a number of existing buildings in the immediate vicinity which could be reused to provide space for a department store or small hotel (Ladywell Play Tower, Citibank Building or the Coroners Building).

More restaurants and takeaways and pubs should not be allowed. Lewisham already has enough of these uses. Would rather have more green space. Jobs provided by the development would be likely to be low paid and low skilled with poor staff retention. As new enterprises fail, Lewisham will be left with higher levels of unemployment.

Cannot see the point of residential development. Dangers to residents would facilitate the building of underpasses and bridges. What about car fumes and extra demand for water sewerage, schools and educational facilities? The leisure facilities would be much smaller than those available in Ladywell Leisure Centre.

The benefits are only hypothetical and cannot be guaranteed where as more people will always increase the burden on local services. The scale of development will make Lewisham a less attractive place to live. Would want to move away from Lewisham if it went ahead (and many neighbours would probably do the same).

Not clear how the development fulfils S.106 – benefits to the community. Requests details of Lewisham’s high rise policy and questions the height of the Sundermead development (does not remember a seven storey building being shown in the previous drawings).

### 36 Fossil Road

Should consider combining the cycle and pedestrian crossings (as is done at Deptford Bridge). The existing crossings over Loampit Vale do not operate satisfactorily and it is unnecessary to have two separate crossings, avoiding unnecessary cycle crossing lights. The existing crossing at Loampit Vale does not allow cyclists to operate the crossing and must be done by a pedestrian. The problems are exacerbated by a yellow box junction. Congestion in the vicinity of the pedestrian/cycle crossing makes cycle manoeuvres unsafe.

Supports the changes suggested by QWAG to create additional space for the Quaggy. It is important that as much open space is natural rather. Paved public areas does not adequately compensate for the loss of green space.

### 60 Fossil Road

Generally in favour of the proposals, particularly the intention to make better use of this prime location and to integrate the transport interchange with the shopping area.

However, the bus stopping arrangements look far from ideal. With risks of congestion, more use will be made of the Loampit Vale stop, which already causes significant congestion. There is no indication of a city bound bus stop to replace the siting bus stop in Loampit Vale. Passengers travelling in that direction would have to walk further to cross the road.

Increased congestion from buses using the layover in Thurston Road and increased risk of accidents

Not clear how traffic would access the Molesworth Street car park. The road is very wide at this point and is difficult to cross.

The plans do not appear to make use of the confluence of the Ravensbourne and Quaggy Rivers which appear largely built over. This would appear to be a potential waste of a valuable feature.

### 73 Foxborough Gardens

Appalled at the plan to disfigure Lewisham Town Centre with high rise buildings and object to loss of open space and green areas. Does not believe that this scheme will bring any benefit to Lewisham. Would like to see a reduction in traffic through and around the town centre and easier access to the station and opening up of Rivers.

### 7 Gilmore Road

*Broadly in favour of the proposals. It will make Lewisham more attractive in terms of linking the existing shopping centre to the transport nexus. Main worry is the level of traffic that will be using Rennell Street. Rennell St should be widened to accommodate 6 lanes of traffic.*

### 9 Gilmore Road

Resident is very concerned about how the planning application will impact on the Quaggy. Is very disappointed that nothing is being done, bearing in mind that consultation exercises have found that environmental issues (including opening up the rivers) are 50% more important than the next issue. The road should be moved a further 4 metres away from the river, so that the Quaggy can be improved (with sloping banks and a natural channel).

### 15 Gilmore Road

The development does not make the most of the Quaggy River. Understands that 2000sq m of green space will be lost to the development. Should move the realigned river 4 metres from the Quaggy, to provide for a much improved river channel with civilised sloping banks to the waters edge. The option to move the road 4 metres for the river bank is a real choice (feasible in both financial and design terms, with many other benefits that cannot be quantified). Widening the river corridor should improve the shopping experience and should be viewed as a fantastic conclusion to the on going Quaggy improvements upstream.

### 23 Gilmore Road

Resident is disappointed to see that the Quaggy is not proposed to be opened up to create a greener town centre. Wants to see the roads moved back a further 4 metres from the Quaggy to allow for a gentler sloping river bank. Should be like Sutcliffe Park which has provided a pleasant environment for wildlife as well as people.

### 35C Gilmore Road

Resident concerned about hiding our rivers away. Early consultation highlighted the importance of environmental improvements. With the current plans, Lewisham will end up with diminished rivers, diminished green space and unprepossessing buildings. Rivers should be central to the scheme.

### 21 Gordonbrock Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. She is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions

of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 8 Granville Park

There is no proof that the road system will work and fears that traffic will get worse. The resident is opposed to moving the rivers, especially to accommodate high rise buildings, is opposed to anything that lowers air quality, is appalled by the lack of affordable housing, objects to the loss of Metropolitan Open Land, supports QWAGs proposals to widen the river, can see no business case for further retail and office accommodation and believes that cheaper scheme could improve the roundabout without blighting the area in such a permanent way.

### 50C Granville Park

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

Lewisham in its current state is a culture-less barren monstrosity. Please don't add more traffic, shops and concrete to it. Ban the car and improve the quality of public transport. How about a modern concert hall or arts facility? Lewisham needs to be a place that people feel healthy in.

### 76 Granville Park

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. She is opposed to moving rivers, objects to anything that lowers air quality, is appalled at the lack of affordable housing, objects to the loss of Metropolitan Open Land, supported QWAGs proposals for the Quaggy and sees no business case for building more offices and retail units. A cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 85 Greenwich South Street

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. Opposed to moving rivers, objects to anything that lowers air quality, is appalled



at the lack of affordable housing, objects to the loss of Metropolitan Open Land, supported QWAGs proposals for the Quaggy and sees no business case for building more offices and retail units. A cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way. Is the least attractive scheme the objector has ever seen and should not be approved.

#### 137 Inwen Court, Grinstead Road

Resident wishes to protest about the plan to put a new road close to the River Quaggy with more of the Ravensbourne going underground. The road should be a further 4 metres away from the river.

#### 38B Halesworth Road

*Good proposal but would like there to be a cinema. Bus station should not move too far away. Regeneration of the town centre should be welcomed and encouraged.*

#### 75 Harefield Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. Opposed to moving rivers, objects to anything that lowers air quality, is appalled at the lack of affordable housing, objects to the loss of Metropolitan Open Land, supported QWAGs proposals for the Quaggy and sees no business case for building more offices and retail units. A cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 29 Heather Road

The scheme misses the once in a lifetime opportunity to improve the Quaggy and Ravensbourne. Consultation suggests that most people want more green space and to open up the rivers. Green space will be lost, roads moved closer to the River Quaggy and the Ravensbourne covered up. The resident supports QWAGs proposals for a wider channel for the Quaggy. This additional space is a small fraction of the development site.

#### The Little House Heathway SE3

The replacement road layout should integrate the station with the current mall and will be an improvement and should improve traffic flow. However, the opportunity to avoid a pedestrian crossing by placing traffic and people on different levels has been missed.

Objector is concerned about the mass of the buildings. Those on the ground will be hemmed in by tall buildings, as is so frequently the trend. The development

fails to develop useful open space in a densely populated and relatively poor and scruffy area of London. The rearrangement of the Quaggy and Ravensbourne appears to be little improved from the existing and the small but pleasant Quaggy Gardens will only be replaced by a piece of open space surrounded by tall buildings. The route of the Quaggy up to the confluence will be narrow and scruffy.

The scheme has some good points but misses the opportunity to improve valuable open space in order to replace it with tall buildings.

#### 17 Denham Court, Kirkdale

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. She is opposed to moving rivers, objects to anything that lowers air quality, is appalled at the lack of affordable housing, objects to the loss of Metropolitan Open Land, supported QWAGs proposals for the Quaggy and sees no business case for building more offices and retail units. A cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 7, Lambercroft Avenue, Mottingham

Supports QWAG's objections to the proposals. The scheme should give much more room to widen and improve the Quaggy river corridor.

#### 7 Leathwell Road

The objector's main concerns relate to lack of thought invested in the transport infrastructure, poor architectural plans and zero consideration of economic development. He can see no consideration of the impact of the development on trains stopping at Lewisham station. He feels that the network is already operating at capacity and the slightest mishap causes major passenger delays.

No thought has been given to the aesthetic impact of the proposed buildings. The existing Citibank is already an eyesore. Building more cheap high rise development does not seem to be an improvement.

He cannot see that creating many underpaid jobs will contribute to regeneration. More consideration needs to be given to providing workspace to smaller operators, avoiding chain restaurants and bars in favour of local equivalents. The plans appear to be half formed.

Vast improvements could be made by other means, (a pedestrian flyover from Lewisham Station to the shopping centre, perhaps enclosed with glass blocks) and a more intensive redevelopment of the pedestrian area in the High Street. It might also be worth rebuilding the Citibank Building.

### 139 Lee Park

Objector and local friends appalled by the suggestion that the town centre could be regenerated by 800 new flats, only a small fraction of which would be affordable. Object strongly to this element. Would like to see the data on which the plan was based and asks what research or computer models show the impact on the already overstretched transport system and health services in the area. How can the crowded roads cope with more traffic?

### 6 Lewisham Hill

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. She is opposed to moving rivers, objects to anything that lowers air quality, is appalled at the lack of affordable housing, objects to the loss of Metropolitan Open Land, supported QWAGs proposals for the Quaggy and sees no business case for building more offices and retail units. A cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 19 Lewisham High Street

*Concerned about the closeness of the development to his house. Concerned that it will block light from my house and will mean that I will move from not being overlooked at all to being overlooked. Also concerned about height of building with one of the higher parts being in front of house (the mid zone) Concerned about the removal of Quaggy Gardens – the River should be properly developed to remove the culvert and to make green space around it. The road would then have to be re-thought. Concern about noise coming closer to his house as well as disruption over many years associated with construction noise. The respondent requests that the developer provides him with double or even triple glazed windows and states that the documentation should be more specific about measures to minimise disruption.*

### 21 Lewisham High Street

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. She is opposed to moving rivers, objects to anything that lowers air quality, is appalled at the lack of affordable housing, objects to the loss of Metropolitan Open Land, supported QWAGs proposals for the Quaggy and sees no business case for building more offices and retail units. A cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 31 Lewisham Park

Not really relevant, but linked the Gateway scheme to the potential of redeveloping Lewisham Bridge as a secondary school.

### 312-314 Lewisham Road

Hopes that consideration is given to existing businesses and that there enough affordable businesses offered to existing traders so that they are not disadvantaged in any way. Would be a shame if long term traders are put out of business.

### 324 Lewisham Road (Pitchers Sports Bar)

The publican objects to the development on grounds that the development will remove sole livelihood. The plans have already affected my livelihood of refurbishment restrictions which hinders the business in comparison with neighbours who fall outside the affected area They therefore have an unfair advantage.

There have been no satisfactory details in terms of compensation for me and my family.

### 326 Lewisham Road

The operator objects to the proposals on the grounds that the proposed development is not appropriate for the town centre and local people have not been sufficiently consulted.

### 56 Limes Grove

He does not believe that the road system will be efficient. Buses can take 30 minutes to get from Lewisham to New Cross. The density of development is too high and out of scale with the town centre. The opportunity to open up the rivers will be lost. The new public space is not convincing. Objects to the loss of Metropolitan Open Land and can only see the development blighting the land. Lewisham will be another anonymous part of London

### 23 Littlewood

Concerned about the low level of affordable housing proposed (should be at least 50%). He objects to the high rise nature of the scheme and the lack of development to cope with the traffic. He is also concerned about the loss of open space. The scheme should be totally redesigned and fully consulted upon.

### 66b Loampit Vale

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. She is opposed to moving rivers, objects to anything that lowers air quality, is appalled at the lack of affordable housing, objects to the loss of Metropolitan Open Land, supported QWAGs proposals for the Quaggy and sees no business case for building more offices and retail units. A cheaper scheme for replacing

the roundabout should be promoted without blighting the area in such a permanent way.

#### Lewisham News Kiosk – Loampit Vale

Trades outside the DLR and will be affected by the development. Wants to find out whom to talk to, in terms of moving the kiosk or if she could be located into one of the shop units proposed. Wants to continue to trade in the town centre.

#### 49 Limes Grove

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. Opposed to moving rivers, objects to anything that lowers air quality, is appalled at the lack of affordable housing, objects to the loss of Metropolitan Open Land, supported QWAGs proposals for the Quaggy and sees no business case for building more offices and retail units. A cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 29 Luffman Road SE12

Supports QWAG in their campaign to improve the Quaggy through Lewisham. It would be a shame to lose the opportunity to make use of the River Quaggy to enhance the town centre. The roads should be 4 metres away from the Quaggy to allow for river enhancements. The enhancements to Chinbrook Meadows have been significant.

#### 21 Magenta Close, Billericay

His main concern is the location of the bus layover facility. This will impact on the residents of Armoury Road in terms of access to the town, increased noise and pollution and loss of value.

The existing access under the railway to Thurston Road is a convenient route into the town for those living on Armoury Road. The layover would mean a significant detour around the facility and would increase journey times to the station and town centre. Idling buses close to Armoury Road properties will compound existing noise pollution and other forms of pollution (including air quality).

#### 47 Marsala Road

*No provision in the new plans for through traffic. There may be better facilities for pedestrians, but it will still be a rush hour nightmare.*

#### 62 Marsala Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. She is opposed to moving rivers, objects to anything that lowers air quality, is appalled at the lack of affordable housing, objects to the loss of Metropolitan Open Land, supported QWAGs proposals for the Quaggy and sees no business case for building more offices and retail units. A cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 108 Marsala Road

Resident supports the scheme which will be another positive step in the regeneration of Lewisham Town Centre.

#### 139 Marsala Road

The development appears too intensive for the area generally and the breakdown of different uses does not seem to balance out. There appears to be very little services for the new residents. There will be additional congestion for existing and future residents. The planning gain seems minimal, even though such developments have huge impacts on local schools, health facilities, transport and other facilities. This is not the right solution for Lewisham.

#### 12 Rawlinson House, Mercator Road

Resident is concerned that the development will result in a loss of green open space. Furthermore, the scheme does not allow for the restoration of the river. The area currently appears to exist solely to accommodate traffic. The existing rivers are away from pedestrians and are muddy and unappealing. The road should be at least 4 metres away from the Quaggy and the river restored with gentle safe river banks.

#### 10 Manor Avenue

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. Opposed to moving rivers, objects to anything that lowers air quality, is appalled at the lack of affordable housing, objects to the loss of Metropolitan Open Land, supported QWAGs proposals for the Quaggy and sees no business case for building more offices and retail units. A cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 46D Manor Avenue

Was shocked when read of plans for the development and even more shocked when saw the images and how this would change Lewisham and the surrounding areas. The buildings are ugly, large and unnecessary. Research has shown problems with high rise living and plans would mean a population increase of

around 2000 people which is ridiculous as local resources are already overstretched. Brownfield sites should be utilised instead. Identifies a number of vacant and derelict buildings within the Borough and is angry that they are being left to collapse while money is wasted building ugly flats of green land. Plans also show significant loss of open space which should be enhanced rather than lost. Too many areas of paving when more greenery is needed. No guarantee that businesses will move to Lewisham and Citibank should be reused. Population rise would affect transport and it is already a struggle to get on trains in the morning. Also resulting increase in pollution from increase in traffic and jams which could cause health problems. Suggests that less should be spent on a scheme to build a pedestrian subway under the roundabout or a pedestrian flyover.

#### 83A Manor Avenue

Objects to planning application.

#### 5 Mercia Grove

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 10, Mill Lane SE18

*Good idea and would like to see a cinema.*

#### Montague Avenue SE4

He objects on the grounds that it will change the character and appearance of Lewisham forever, obliterating views from historic and conservation areas. He objects to any loss of Quaggy Gardens. The rivers are natural resources and should be utilised and promoted in Lewisham. He is not convinced about the transport plans and does not believe that the scheme has been highlighted enough to the residents. Air quality is a further concern and how environmentally friendly the development will be.

#### 98 Murillo Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions

of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 12 Oakcroft Road

Concerned that the scheme involves the demolition of the former Plough public house and it would be highly desirable to avoid its loss. The demolition of small businesses is also regrettable unless concessions are made to retain local services (eg dry cleaners) on readily accessible and affordable sites.

Very concerned that there will be no setting down for passengers at the stations leaving them a long climb with their luggage. Also, it will be difficult to pick passengers up from the station.

However, generally supports the scheme as a means of sorting out the appalling arrangements for pedestrians introduced by the roundabout (which the resident originally objected to).

The resident would also want the reopening of the alley up to Platform 3 or allowing more frequent access onto Platform 4.

### 23 Oakcroft Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 25 Oakcroft Road

The objector is particularly concerned about the height of the buildings, which is unsuitable for the surrounding area (especially views from Blackheath and Brockley). The area will be a windy, no go environment. There is no proof that the traffic system will work and feels that there will be a deterioration of air quality and additional noise pollution. This large development will blight the area.

### 32 Oakcroft Road

The objector sees no proof that the road system will work and fears that traffic will get worse. Is opposed to moving rivers, especially if it is to accommodate high rise buildings. Also objects to anything that lowers air quality and is appalled



by the lack of affordable housing. Supports QWAGs concerns over the Quaggy and sees no business case for building more offices and retail units. He feels that a cheaper scheme could improve the roundabout without blighting the area.

#### 5 Oakshade Road

The resident is aware of the general improvements along the Quaggy and is concerned that the proposals aim to encroach on green space alongside the river. This green space should be maintained to allow for landscaping and walkways for pedestrians to enjoy the waterway.

#### 23 Offord Road (Roger Stocker)

*Very poor cycle access both west-east and north-south. Area will still be dominated by main busy roads with little improvements for cyclists and pedestrians. Why no grade separation for pedestrians. Crossing needs to be at least 20 metres wide. 500 car parking spaces is too many. Cycle links between Ladywell and the Tesco site needs to be provided along with improvements to Lewisham BR station.*

#### 1 The Orchard, Blackheath

Resident urges the applicant to reconsider the current proposals for the Quaggy. QWAG's proposal for an extra 4 metres would allow the proper restoration of the river.

#### 68A Overcliffe Road

Letter to Giles Dolphin (cc to LB Lewisham) and letter to Lewisham.

The GLA letter refers to the inadequacy of the original transport submission and especially asks the question whether the updated transport assessment will use a Micro-simulation model. Also asks whether the evaluation takes account of other developments proposed within the Loampit Vale, Lewisham Gateway area. The resident argues that the original evaluation does not appear to include buses in the estimates of the increase in traffic caused by the Gateway development. A 3% increase in traffic generated by the development is clearly unrealistic. He suggests that the new evaluation should take a more realistic approach and include extra bus traffic on Loampit Vale that will result in the relocation of the bus layover.

The letter to Lewisham raises issues about the workability of the new junction. He states that the transport assessment is biased in favour of the development and does not give a true reflection of the traffic congestion that would result. It does not take account of cumulative impact. The letter also refers to Lewisham Town Centre which is in a valley not surrounded by concrete. The development would resemble an oppressive concrete jungle which will change the character of the area for ever. The scheme will not represent improvements or regeneration. It

will be similar to the negative impact that the Elephant and Castle produced in the sixties.

Public consultation on the scheme has been inadequate. The consultation letter did not clearly indicate the presence of 70 metre high tower blocks. The letter required the reader to work out the likely implication of the development figures presented.

At no point has a survey of opinion been undertaken similar to that for the proposed development of Loampit Vale or traffic calming schemes. If a proper case had been made, the objector would not have been objecting.

#### Flat 1, 7 Princes Rise (letter and e-mail)

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. Opposed to moving rivers, objects to anything that lowers air quality, is appalled at the lack of affordable housing, objects to the loss of Metropolitan Open Land, supported QWAGs proposals for the Quaggy and sees no business case for building more offices and retail units. A cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 23 The Priory, Priory Park

The new road should be located 4 metres away from the Quaggy and should be restored with safe and gentle sloping banks.

#### Flat 1 152 Rye Lane

Wants to find out who to speak to gain a new shop as business will be affected by the development. Has a successful phone card kiosk on Loampit vale.

#### 1 St Austell Road

Is delighted that there will be significant development of what is a scruffy and pedestrian unfriendly hub of the town. However, the resident can see that there will be significant disruption of traffic as the development takes place, especially when wanting to travel out of the St Austell Road area.s

#### 130 Salehurst Road

Lewisham 2000 did not make enough of the available opportunities, but it opened up some attractive green spaces. The new plans will totally wipe out these spaces. Not enough is made of the rivers and more is needed to be made of the course of the River Quaggy. I would prefer to have more delays travelling through Lewisham than to lose green space to accommodate lanes of traffic should allow the Quaggy to flow in a more natural course and we will then have an asset that money cannot buy.

### 68A Sandrock Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings. We should be highlighting natural beauty, not destroying it. Blackheath and Greenwich are places that people wish to live in because of their parks, interesting shops, monuments and beautiful historic buildings. We will be putting Lewisham on list as next nearest town that is worst place to live. She is also concerned about air quality, is appalled about the lack of affordable housing, can see no business case for more shops and offices. She believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 48 Shell Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 69 Shell Road

A financial return to the developer can be done without jeopardising the health, wealth and social well being of Lewisham residents. The replacement of the roundabout should hold more aesthetic appeal, accommodate larger volumes of public transport vehicles and priorities the safety of pedestrians and cyclists.

Concerned about the lack of affordable housing. Complains that Lewisham already has unlet office accommodation. Insufficient consideration has been afforded to the existing market and retail units in Lewisham High Street (including the Lewisham Centre) should be prioritised as the focus for regenerating the retail economy. There will be social and health impacts associated with high rise development. Medium and low rise would be preferable. This may mean the reduction of residential accommodation and office space. One should observe the difficulties residents will experience (similar to Milford Tower residents).

The health and social networking of Lewisham needs to be accommodated. Residents will need access to local health services. Needs will not be met by existing capacity. It is reasonable to offer residential accommodation without car parking, in view of the sites sustainable credentials. Residents should be given spaces for secure cycle storage. Attention should be given to organising a car loan business.

If residents with the financial wherewithal chose to vote with their feet and depart, Lewisham will be disadvantaged.

#### 1 St. Germain's Villas, Silk Mills Path

Object to high rise buildings and notes that there is already plenty of office space in Lewisham Gateway. States that her neighbours are not aware of the scheme but if they were they would object.

#### 6 Silk Mills Path

There is no proof that the new road system would work and fears that traffic will get worse. The objector is also opposed to moving river, especially to accommodate high rise development. He is also opposed to anything that lowers air quality and is appalled at the lack of affordable housing in such a huge development. He objects to the loss of Metropolitan Open Land (Charlottenburg Gardens) and supports QWAGs proposals for improving the Quaggy. He can see no business for more shops and offices and believes that a much cheaper scheme could improve the roundabout without blighting the area in such a permanent way.

#### 10 Slaithwaite Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. Opposed to moving rivers, objects to anything that lowers air quality, is appalled at the lack of affordable housing, objects to the loss of Metropolitan Open Land, supported QWAGs proposals for the Quaggy and sees no business case for building more offices and retail units. A cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 29 Slaithwaite Road

Strong support for the proposed for the proposed development of the Lewisham town centre. Has been living in Lewisham for several years and believes that the town centre is in desperate need of a revamp and this development can not come soon enough.

Will Debenham's or any other department stores be included within the proposed development and will there be new entertainment facilities such as a cinema, restaurant, leisure, bars etc?

States that views are shared with neighbours who also are owners on the same street that I live in.

#### 106 Tressillian Road

Has lived in Lewisham for 18 years and is pleased that the Council wants to make a significant improvement to the town centre but does not support the proposals made to date. Concerned about the poor track record of the Council and do not think they are the right people to be leading the development. The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. Does not think the Council or the developers are competent to identify and deliver improvements and that alternative experts should do this with a better track record. Opposed to moving rivers, objects to anything that lowers air quality, is appalled at the lack of affordable housing, objects to the loss of Metropolitan Open Land, supported QWAGs proposals for the Quaggy and sees no business case for building more offices and retail units. A cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way. Suggests that a number of alternative management organisations should be proposed and residents should chose one based on their merits. She nominates the organisation responsible for Coin Street.

### 3 Tyrwhitt Road

The resident has no proof that the road system would work and fears that the traffic will get worst. He believes a cheaper scheme could improve the roundabout, by separating the pedestrian flows from the traffic. Pedestrians should be redirected either under of over the roads. There are sufficient development sites without creating a further large site for which there is not proven demand for occupation.

### 94 Tyrwhitt Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. She is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

The town centre will soon be very similar to Croydon. There is a sense that depersonalisation is the only way to progress in this day and age. Will not be proud to walk through the development in ten years time.

### 6C Vicars Hill

There is no proof that the road system will work and fears that traffic will get worse. The resident is opposed to moving the rivers, especially to accommodate high rise buildings, is opposed to anything that lowers air quality, is appalled by the lack of affordable housing, objects to the loss of Metropolitan Open Land, supports QWAGs proposals to widen the river, can se no business case for

further retail and office accommodation and believes that cheaper scheme could improve the roundabout without blighting the area in such a permanent way.

#### 9B Vicars Hill

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. Opposed to moving rivers, objects to anything that lowers air quality, is appalled at the lack of affordable housing, objects to the loss of Metropolitan Open Land, supported QWAGs proposals for the Quaggy and sees no business case for building more offices and retail units. A cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 11A Vicars Hill

Concerns about the effect of the proposal on local traffic as Vicars Hill is already suffering from over-use. As a consequence they suffer from noise and air pollution. Also worried about parking provision.

#### 27 Vicars Hill

Even though he has received a leaflet from a campaign group against the Lewisham Gateway proposals, wanted to email to say that he is in favour of the proposals. He feels that the development will benefit Lewisham (more shops, homes and improved road layout). Does not see how the existing townscape would be spoilt by adding some extra high rise buildings. Also he does not support the argument that more congestion would be caused (with Lewisham being an urban centre which is already congested to the point that car users are deterred).

#### 36 Vicars Hill

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. Is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 38 Vicars Hill

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions

of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 44 Vicars Hill (two letters)

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. She is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 46 Vicars Hill

His property overlooks the town centre and is a user of Hillyfields. She objects to the Gateway because of its impact on the environment. The scheme at ground level will have a poor impact on the shoppers, commuters and residents. There is no evidence that the road scheme will represent an improvement and is concerned about views across Lewisham. He supports QWAGs proposals for the Quaggy and feels that the development will undermine the value of the rivers through Lewisham. The development will do nothing for air quality. The retail units proposed will not attract the retailers that we need to improve the town centre. The site will be blighted with empty properties. We need a thoughtful development that is not driven by a developer's desire to maximise profit.

#### 45 Waite Davies Road

Hope that the development will make going round the area a lot safer as drivers currently take their life in their hands. More needs to be done with the High Street (frightened of knocking over fruit and vegetable boxes and slipping on fruit and vegetables not picked up. Centre is a pick pocket paradise. Fish stall stinks of rotten fish with no refrigeration.

#### 16B Walerand Road

The objector is concerned about the principle of high rise buildings which will blight the local landscape. It is a great shame that Charlettonburg Gardens and Quaggy Gardens will be lost to the development. She sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. She supports QWAGs proposals for the Quaggy and believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 6 Windsor Court, Southlands Grove

It will be a great pity if the full potential of the Quaggy is not realised. The river should be restored with gentle sloping banks and a safe environment.

### 33 Woodyates Way

There should be more emphasis on leisure and the river junction. The river should be given a further 4 metres so that emphasis of river restoration takes place.

### External Organisations

#### Blackheath Society

The Society remains supportive of this major scheme which will expand the range of retail facilities and other town centre uses will provide a more direct link between the station and the existing centre. Would favour the main route being either covered or canopied.

Principle concern is lack of convenient interchange for rail passengers arriving or being picked up by private car. The Council's emerging strategy should identify other drop off areas at the edges of the development. Able bodied passengers should be able to be dropped off during off peak times. The possibility of a new link over the relocated Rennell Street (into the Lewisham Centre) would be a welcome addition to the ground level link.

#### LB Bromley

##### Formal Objection

The proposal represents an overdevelopment and is out of scale with the designation of Lewisham Town Centre as a Major Centre. The proposed development is likely to have an adverse effect on the vitality and viability of town centres in the Borough, in particular Bromley Town Centre and will potentially be detrimental to the Metropolitan Centre status of Bromley Town Centre.

#### CABE

Most recent letter (28 June 2006) states that due to limited resources, they are unable to offer any further assistance on the scheme. Refer to the previous letter (dated 22 February 2006). This letter offered a warm welcome for the aspirations set out by the proposal. CABE support the removal of the roundabout and the improvement of the connections.

It commended the decision to distribute bus stops around the site, rather than concentrate the buses at the bus station. The mix of uses (including the cinema and restaurants was welcomed (with links to the night time economy).



Concerned about whether the quality of Confluence Place will match the importance attached to it. Welcomes the use of water and attempts to engage with the public with the rivers in the square. However there must be commitment in terms of the necessary budget and design time and the on going management of the open space.

Seems to be a tension between the tranquillity suggested by the use of greenery and water as prominent features and the expectation that the area will be heavily used. The design team should be clear about what nature of the space is intended to be and what the patterns of use are likely to be.

CABE thought that the scheme would benefit from greater differentiation in terms of mass in the height of the blocks. The higher building could act as markers for the scheme. The massing should take into consideration issues such as daylight penetration into the public space.

The scheme has the potential, to bring great improvements to this area; its inspirations are laudable. It is important that a scheme for this site is of a very high quality.

#### The Countryside Agency

The application does not affect any priority interests of the Countryside Agency within Greater London and therefore have formally confirmed that they do not intend to make formal representation.

#### English Heritage

The application should be determined in accordance with national and local policy guidance and on the basis of your specialist conservation advice

#### LB Greenwich

##### Formal Objection

Block F is the only building from the Lewisham Gateway development to be shown illustrated in information provided for the proposal. It is therefore considered that there is insufficient information provided in visual form for other buildings situated within the proposal.

The proposal is considered by the Greenwich Borough Council to be unacceptable due to its height, scale and bulk. The height, scale and bulk of the Lewisham gateway development is considered to be detrimental to local views enjoyed from within Greenwich Borough.

#### HSE

The scheme does not appear to meet agreed criteria and therefore the HSE is unable to provide advice on the suitability of the proposed development.

## Ladywell Society

The scheme addresses the present predicament of pedestrians getting to the centre and especially from the station and DLR. Rennell Street is the only road to cross compared with at least three currently.

Bus stops are adjacent to the development with no roads to cross.

Support the mix of uses which should revitalise the area, especially in the evenings. It will either make the centre much safer, or have the opposite disastrous effect.

Limited use has been made of the Ravensbourne and Quaggy as a focus landscape feature for the centre.

If the estimated provision of 800 residential units takes pressure off unsuitable and over dense development in residential areas, the high buildings are acceptable. However, they will be highly visible (from high ground) and will need to be of the highest quality.

## But

The plan seems ambitious when one looks at the size of the whole site

The low H will cause bottlenecks in a major route through the centre Rennell Street will significantly slow down traffic (with a reduction in the number of lanes) and will it take account of the need to keep coach routes free (and a stop for national Express coaches).

The effect of the traffic flow on the access to the 500 space underground car park.

Will the length of bus stopping in Molesworth be enough to accommodate the different bus routes intended.

Appears to be insufficient banks for the rivers and also more rivers will be covered than they are at present.

The height of the buildings will mar the view from many houses that look across the valley in which Lewisham is situated. This is already causing concern in the Ladywell area. Also there is concern that the infrastructure (education, health, social services, sewerage etc) will be able to cope.

Unclear where the access into the Riverdale Centre is going to be as the plans do not indicate detailed changes.

The scheme should not jeopardise Lewisham market and its stallholders.

There appears to be no intention to include cultural activities as part of the development (art gallery, museum or theatre/concert hall within the site, apart from a possible cinema or leisure complex.

Hopes that a compromise can be reached where some of the points raised in the prior consultations have been considered (especially pedestrians) The Society is particularly disappointed that the landscaping of the two rivers is so limited.

### Lewisham Cyclists

Whilst there are some positive aspects of the planning application, such as cycle parking and some re-routing of LCN's and routes, there are a number of major gaps in the assessment that need to be addressed at an early stage, such as the number of cycle spaces for residents, a more rigorous assessment of the dismount policy and a more careful assessment of safety improvements. The plans lack vision and do not appear to fulfil much more than minimum expectations. There needs to be a more progressive approach to cycling.

The proposed cycle facilities do not go far enough. Not clear whether the cycle advance areas will be signal controlled for cycle priority or as simple advance stop lines sharing the same signal as other transport modes. Extra wide bus lanes to allow safe overtaking of cyclists by buses should be considered if they are to share the road. Alternatively, built cycle lanes should be considered at certain stretches on main roads (provided that there is no traffic conflict at junctions). They questions why segregated cycle lanes were not considered in the Transport Document.

The cycle route between Lewisham High Street and Loampit Vale would skirt north-west along Station Road and then south, which will be a long diversion. A westbound cycle route should be provided on the south side of Rennell Street to provide an alternative direct route. Alternatively, a cycle route should be allowed to go east west through the centre of the Gateway to provide a direct and safe route to Loampit Vale.

The crossings appear to have secondary priority to the road in the plans, which go against general UDP approaches. The only toucan crossing mentioned is at the junction of Lewisham Road and Station Road. There is no other mention of toucans to help cyclists access the development from the south west or to other parts of the gateway development. The pedestrian crossing across Rennell Street should be much wider, bearing in mind the volume of people who use the stations. The crossing needs to take account also of cyclists wishing to cross as well as wheelchair users. Tiger Crossings (shared use) should be considered.

Lewisham Cyclists are against a complete ban on cycling within the Gateway development. The dismount policy could be made much clearer in the Transport Assessment. They suggest that shared pedestrian cycle use be made of certain low density routes through the Gateway and the pedestrian flow models suggest that there is some spare capacity to accommodate shared use (south and

northern parts of the development). One should not discriminate against trikes and bicycles (which are considered to be mobility aids).

Support the short and long term cycle parking requirements. Short stay cycle parking should be conveniently located (close to shops and leisure facilities). If dismount policy is followed, there will need to be storage on the margins of the development which will not be conveniently located. The location of cycle parking should be linked to the shared surface strategy. One also needs to consider CCTV within the development.

Requests that the number of residential secure cycle parking is clearly set down as part of the outline planning application (in absolute terms) and included in the plans for the start. As the flats are unlikely to be occupied by single residents the cycle parking standard should be increased to 2 per flat.

### London Cycle Network

The LCN route 143 passes through the Lewisham northern roundabout. As a consequence,, a high standard of route is expected to be developed. Also LCN has a planned route along the A20 (by 2010) through the northern roundabout.

Cycle lanes and cycle track should be provided between the junctions, given the number of vehicles along this route.

Access to and from the transport interchange by bike should be possible without dismounting. Cycle users should be accommodated along Station Road (both directions) – a contra-flow arrangement.

Further guidance on cycle parking should be taken from the London Cycling Design Standards (particularly micro positioning and disability discrimination act).

High priority should also be given to provision of secure cycle parking immediate to the transport interchange. A survey should be carried out to identify secure cycle parking is most likely to be used by commuters using the station.

### Met Police

Met Police is concerned that the development will restrict or stop police vehicles from accessing Lewisham High Street via St Stephens Grove, Cressington Road and Granville Road. The Police are concerned about the installation of barriers at the various junctions outlined above.

Police object on the assumption that the scheme restricts and stops police access.

### PCT

Planning obligations are required for health service to meet the increased need for health facilities to meet the increased need for health services generated by

the proposals. If such support is not provided, health service facilities are likely to be adversely affected.

The health service is currently operating at or above capacity in some/all areas. In order to expand, the PCT requires increased resources. With the time lag between population growth and resources becoming available the PCT is experiencing funding gaps and workforce shortages. In order that development is sustainable, the PCT will need to be assisted with the means to meet the increased need for primary health services and facilities during the funding gap period.

Using the HUDU model (and with reference to Circular 05/05) it is calculated that the proposals would create health needs that would cost £4,835,000 to address. Local practices, Morden Hill, Belmont Hill, Morley Road, Lewisham way are all running at capacity (in terms of list sizes or site capacity).

The letter refers to various policies (London Plan policy 3A.17 and 3A.18) which calls for greater engagement with health providers in order to improve public health and health service provision. It also refers to para 3.84 and 3.85 of the Plan which states that adequate health facilities may often be needed as part of large scale development. Policy 3A.20 requires Boroughs to have regard to health impacts of development. The letter also refers to STR.LCE 1, IRM2 and IRM 3 of the adopted Unitary Development Plan.

In the absence of a clear commitment by the developer to assist in meeting this funding gap, Lewisham PCT has no option but to object to the proposals. It looks to the support of the Council to address these matters via planning obligations and for the opportunity to define the terms of the obligations.

#### Quaggy Waterways Action Group

Object to the scheme as it fails to realise the potential of the rivers, removes existing potential to restore or enhance the rivers and degrades the river environment. In doing this it fails to reasonably take into consideration the consultation carried out by Colin Buchanan and Partners in 2002 which highlighted rivers and green space as the most important feature for users, fails to take into account the priorities identified by the Urban Renaissance in Lewisham, fails to take into account London Plan policy, does not fulfil the Lewisham Gateway Planning Brief and does not fulfil UDP policies.

QWAG would like to see the road system moved away from the river and object to the culverting of the Ravensbourne. They also note that green space along the river corridor would be removed which they feel would remove the potential to improve the river system in the future. They raise issues of loss of daylight and sunlight to the river noting that the Es does not comment on this, an increase in wind in 'Confluence Place' and the degradation of landscape and amenity value of the rivers by bringing buildings and roads closer to the river.

Comments about the selection of the 'H' road arrangement state that during the process the layout was shown without the additional culverting of the river and this prejudiced the selection. They urge a reassessment of the road layout.

In conclusion they state that the proposal would remove two thirds of the current potential to restore the rivers in central Lewisham and that the restoration proposed would only be of 20% of the rivers which would be a loss to the area.

#### Internal Comment/Councillor Comment

##### 85 Ermine Road (Councillor Mike Keogh - Greens)

*A 4 metre extra width for the Quaggy will be an asset to Lewisham (should be designated as Metropolitan Open Land) and should be progressed. Imaginative buildings should take account of this change (on the west side) with buildings overhanging the road to make up for lost floor footprint. The developer should provide for brown roofs wherever possible to ensure compliance with targets contained within Lewisham's Biodiversity Action Plan. Make Lewisham unique and bring back Quaggy wholesale. Traders will pay a premium to operate here, to make up for 4 metre strip.*

#### Councillor Mike Keogh

The bus standing area relocation to Thurston Road has the possibility of being built over with housing, admittedly by a busy railway platform. The 700 dwellings could then be distributed more widely and the block of development within the centre reduced. Flats above the bus layover would be car free and he is sure that technology could create a safe, quiet and clean living block and TfL could gain some rent and income.

#### Councillor Johnson

Councillor Johnson has confirmed that he supports QWAG's proposal to move the road 4 metres from the Quaggy to allow the river to be fully restored and to create a decent riverside environment in the heart of the town centre. Without this, he is concerned that the overall plans would fail to give significant priority to green space and the river.

#### Councillors Johnson, Michel and Phoenix

The Green Group supports the regeneration of Lewisham Town Centre, to improve the links between the station and the town centre, to make the river more accessible and a key feature of the town centre and to provide high density development given the good transport links that make the site suitable for accommodating Lewisham's growing population. We believe that making the town centre a more attractive shopping venue will encourage shoppers to shop locally, thereby reducing the number of car journeys. We also welcome improvements to the bus facilities. However, we have some serious concerns:

- Agree that detailed traffic modelling is required to determine whether the low H shape is appropriate
- Supports Lewisham cyclists in demanding safety improvements, improved cycle routes through and around the Gateway, crossing provision for cyclists and increased secure cycling provision
- Calls for a significant reduction in car parking. We would welcome a car free development with no automatic right to a residents permit. Concerned that the level of on site parking will add to traffic problems and exacerbate poor air quality.
- Calls for exemplary standards of sustainable design and construction and am extremely concerned about lack of ambition and lack of detailed information on renewable energy. Would ideally like to see a carbon neutral development but at the very least would like to see renewable energy targets in the mayors strategy adhered to.
- Concerned about the level of affordable housing provided. Calls for the level of affordable to be significantly increased with an appropriate mix of social and intermediate housing.
- Supports high density housing in principle but this is subject to being convinced by full daylight, shadowing and wind reports. The buildings will also need to be of high quality and sustainable in terms of design. Need to be convinced that the level of density can be accommodated, bearing in mind the range of different facilities planned for this site.
- Supports the removal of concrete channels, placing the rivers in their natural setting but we share the concerns of QWAG. The opportunities to improve riverside access have not been maximised. It is important that there is no overall loss of open space and specifically that levels of accessible green space should at least be comparable with existing levels.
- Supports improved shopping facilities but would not want Lewisham to become a “clone town”. Would want to see start up and small businesses included as part of the plans. We would like to see conditions to ensure diversity of retail units and sizes.
- Very concerned about the loss of children’s play area in the Lewisham Centre space and we support the London mayors demand for provision of children’s play space. Indoor as well as outdoor space is needed.

### Building Control

Only limited details provide as part of the application which makes comment difficult and advises the applicant to consult the fire service at an early stage. Also makes general comments on the storage of solid waste (nature and volume of waste storage capacity, details of waste segregation, hygiene arrangements etc) and the need for early dialogue. Confirms that full disabled access will be necessary.

### Env Health (Contamination)

No objection but recommends the imposition of site contamination condition (amended from standard condition)

Whilst not wishing to make any formal comments, it commends the Council in its efforts to enhance existing open space and also welcomes the links to the London plan Policy 3A.4 in respect of Housing choice and Lifetime Homes.

## Anonymous Responses

### Anonymous Comment Sheet

*“Looking good for Lewisham, go for it”*

### Unaddressed Letter

She objects to the proposals. No proof that the road system will work and will probably get worse, especially given all the other developments planned. A cheaper scheme could improve the roundabout. A simple intersection with traffic lights would be a vast improvement. Should be thinking of ways of remove traffic altogether or allow it to move more freely. She is aware of the problems with the roundabout. She is opposed to moving the rivers, especially to accommodate high rise development. We should preserve natural spaces. She can see no business case for more retail and office space and pulling down Citibank would be a much better start. Major redevelopment of the shopping centre is much more important.

You should make the centre of Lewisham a lovely place to visit, with decent restaurants, a market with permanent stalls and a good range of shops and cafes. Lewisham should not be able to rival Canary Wharf. Should be aimed at young families who bring vitality and growth.

### Unaddressed letter

Why build more offices when Citibank is already empty. Air quality will deteriorate. Lots of small businesses are already suffering a lack of customers and high business rates. Opposed to ‘concrete jungle’ as need more open space and uncovered rivers.



**Comments on Lewisham Gateway received after the submission of supplementary information and revised plans**

18 Algernon Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

91 Algernon Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

107 Algernon Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

129 Algernon Road

Not opposed to improvements to area generally but concerned about the impact of the Gateway development and associated development nearby and additional traffic that would be generated. Gateway would give unimaginative and poorly located tower blocks.

204 Algernon Road

The application should be considered in the context of other major planning applications and consideration also given tot the social impact on residents and small businesses. The Council should set a maximum height including rooftop plant of 30m/10 storeys provided this does not impinge on views from Hilly Fields or harm the adjacent conservation area.

Objects to the loss of MOL and Quaggy gardens. Any road realignment should be within the footprint of the site so open space is retained and no need to culvert rivers and the widening of Rennell street also incorporated within the development site. The privately owned and managed park as part of a pedestrian route should not be used as a trade off for the loss of other open space. The maximum area of housing should be increased and could assist in reaching a 35% target for affordable housing and would reduce the amount of A2 use to ensure banks stay on the existing high street. There is a danger of the existing town centre losing its vitality.

Objects to the provision of parking spaces as Council policy promotes car free schemes close to good transport links. The bus layover cannot be determined until the travellers have been relocated.

### 8 Algiers Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 32 Amyruth Road

Consider the development to fail to address the regeneration requirements of Lewisham Town Centre and takes a piece-meal approach when a comprehensive master plan is needed. This should include the regeneration of existing buildings and should have included the Sundermead Estate. Opposed to high rise development without it being considered in its wider context and the road system which will struggle to cope and will cause increased pollution and volumes of traffic. Objects to moving rivers and the loss of MOL and the disposal of public assets for short term gain by developers. Appalled at the lack of affordable homes contrary to the Government Green Paper 'Homes for the Future.' The Council are being 'seduced by a quick, cheap buck from private developer shysters at the expense of a holistic solution and sustainable regeneration of the wider area.'

### 164 Ardgowan Road (2 letters)

Notes comments from the planning brief regarding the transformation of Lewisham into a stimulating and recognisable environment notable for its creativity and opportunity for a vision as a people's place with improved awareness of rivers. Questions the current scheme which he feels is massively overdeveloped, full of unaffordable housing with chain shops. Would like a tramlink. Awareness of rivers not increased by culverting.

### 16 Belmont Hill

The letter discusses at length the history of development and strategies within the town centre, particularly the Lewisham 2000 project, and the individuals involved with them along with the objectors own involvement. He believes that the Lewisham 2000 project was a 'wasted asset' as it was never completed and the aims of the project not achieved because of overspending which harmed the town centre and the market. Feels that instead of completing Lewisham 2000, more money is being spent on removing the benefits of the scheme, such as Quaggy Gardens.

Concerned that the size of units proposed in the application would not appeal to a department store. The low H road layout is misconceived as car numbers are reducing so no new road layout is required, congestion charging should be considered, spending public money on roads is wrong. The existing environment of Lewisham should instead be enhanced involving people who care about Lewisham in the scheme.

Requests that the decision on Gateway is delayed until proper and full consideration of an alternative way forward has been given.

### 33 The Squirrels, Belmont Hill

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 54 Belmont Hill

Was disappointed that the drop in session did not take place on Sunday as well as the Friday and Saturday. Cannot see that the H road would be an improvement on the roundabout and notes that 4 lanes of traffic would be reduced to one at the Belmont Hill/Lee High Road junction. Air quality in Lewisham is bad and would not improve as part of this scheme so people would not want to use proposed amenity spaces which would also be in shadow from tall buildings. The buildings would also impact on views from Hilly Fields and Blackheath. Does the river need re-routing. Concerned about increasing the risk of flooding. Presumes that the new shops would be similar to those in nearby areas but may harm Lewisham market. Is it really necessary to demolish and rebuild the town centre in order to improve access to the station. The scheme is ill thought out and could put residents through years of inconvenience only to result in a faceless clone or white elephant.

### 22 Boyne Road

Concerned about the lack of analysis for flooding and raising sea levels. The drainage should be capable of handling the exceptionally heavy rain experienced in parts of England. This part of Lewisham has flooded recently (within the last 20 years) with several feet of water, and as the proposed development has basements there must be mechanisms for ensuring no loss of life due to flooding.

The proposal of the H shaped new road layout will increase congestion. There has been no simulation with projected increased traffic flows (except a 40% increase of busses). This new proposed layout will not only increase journey times through Lewisham (based on current traffic volumes) which will increase delays in emergency services trying to help sick or injured people, but the proposed design of the new road layout will increase personal injuries.

New developments do not provide enough parking for residents and workers. It is only reasonable to provide 1 residential parking space per flat in the proposed development. Assuming planning permission is given to this proposed development, what is to stop a single local resident from halting the development (permanently) due to the "right of light" law? This development does infringe this law. Can the council ensure that there is

an insurance policy in place that will pay for the removal of this development and restore Lewisham Town centre to a useable area? This policy may also be required for other reasons: for example the developer going bust, the foundations becoming unstable and the development requiring demolition, etc.

TV reception is going to be disrupted / removed by many local residents due to this proposed development. Will the provide free cable TV in perpetuity to the affected local residents?

The artist's impression is totally misleading, drawn from favourable positions and not showing rubbish being blown about 20 feet in the air due to the wind tunnelling effect of the proposed development. The original pictures show 13 stories when 20 are intended and the sun (when it does shine) will be blocked by the buildings, apart from at sunset.

People living in the shadow of this development are going to be blighted and St Stephens church will be obscured by this development.

Air pollution is going to be significantly increased by this development and increased traffic jams. High rise, high density accommodation has many social problems. The Quaggy is effectively a storm drain, and could have health implications to opening it up. Have there been any toxicology reports on this river recently?

The developer was offering the council 20% of the accommodation. This is above the legal requirement and seems like bribery.

In favour of the re-development of this part of Lewisham and of shops, green space, bars, homes, restaurants, cinema, green spaces, etc. but perhaps 6 storeys not 20.

#### 43 Boyne Road – Friends of the Earth representative

Additional comments to supplementary information welcomes car sharing and requests that 500 car parking spaces are reduced. The taxi rank on Station Road is also welcomed. Cycle lane on Molesworth Street needs to be extended and one introduced on Lewisham High Street.

Solar photovoltaic cells, solar heating panel or wind turbines need to be reconsidered and have been successfully implemented in other schemes. Rain water harvesting also needs to be reconsidered.

Support QWAGs proposals to open up the Quaggy. Air quality would be poor and less polluted air from the top of buildings should be introduced into the dwellings.

#### 95 Breakspears Road (2 letters)

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 83 Brockley Rise

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 9 Brookbank Road

The buildings are ghastly, hideous and prison like. Please don't let this happen.

#### 67 Brookbank Road

No proof that road system would work and fears traffic would get worse. Concerned that B&Q may move in before and during road works. Noted that at an exhibition of the scheme officers could not locate landmarks on maps which were unclear. Objects to the lowering of air quality. Appalled at the lack of affordable housing in such a huge development which is her main objection. This coupled with high rise, high density buildings is a greedy development. Parking issues have not been addressed. The travellers site should be located within any development that would be low rise and near to the local school.

#### 113B Brookbank Road

The development would be a blot on the landscape. Find it hypocritical that the Council attempts to maintain period features on buildings in Brookbank Road whilst building high rise buildings next to a conservation area. See no proof that the road system would work and fear traffic would get worse given the other developments proposed. Opposed to moving rivers especially if it is to accommodate high buildings. Objects to lower air quality and fully supports QUAG's proposals for improvements to the River Quaggy. Appalled at the lack of affordable housing in such a huge development and the replacement of Mol with a road. Can see no business case for building more offices and retail units and believes a cheaper scheme could improve the roundabout. Don't see any positive benefits of the development and has yet to see any convincing responses to concerns from the developers. Doubts any residents would support the application.

#### 43 Caterham Road

Air pollution will increase and the new road layout would cause congestion. The large development would not be beneficial to Lewisham and would turn the area into Croydon, a 'very ugly looking wind tunnel.' Does not believe the centre of Lewisham needs more offices and retail units which because of the vagueness of the application could look like existing units on Thurston Road.

#### 38 Chudleigh Road

Concerned that the plans keep changing as what starts off as appealing is cast aside for less favourable options. This has already happened with the loss of Debenhams, the swimming pool not being refurbished but instead replaced, a reduction in affordable housing, a bigger/busier road layout, less open space and a less people friendly, community orientated Lewisham.

#### 6 Church Grove

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 18 Church Grove

Concerned about the issue of pedestrian access and not convinced by that improvement claims of proposal stand up because of reduction in crossings and width of road. Arrangements for cycles poorly conceived and concern about pedestrian/cycle conflict. Main tower blocks are high and would dominate the view from a number of directions and would spoil the aesthetics of the area. Confluence place would also be surrounded by high buildings which would cast shadow over the park. The traveller site has to be relocated and should be included within the scheme.

### 2 Cliffview Road

The Low H road network has been designed to create a large area for development, rather than a road system to improve on the current roundabout. The figures given in the supplementary transport assessment show unacceptable levels of congestion e.g. 96% saturation on Rennell St (AM peak) , 94% saturation on Loampit Vale (PM peak). Can see no evidence in the supplementary transport assessment of current bus movements along Loampit Vale into Jerrard Street being compared to future movements due to the relocation of the bus layover and the possible 40% increase in services. I believe this will seriously add to the congestion on Loampit Vale. Much is made of the improved interchange between bus to train/DLR, yet some relocated bus stops will add 144 metres and 67 metres to the train/DLR to bus interchange (due to the relocation of bus stop G).

The loss of green space will increase surface water run-off. Increasing the local population whilst at the same time reducing the already limited amount of green space in the local area is a retrograde step. The proposed housing mix is unacceptable. There should be at least 35% affordable housing and a broad mix of tenure.

The pedestrian experience is likely to be overcrowded, in shadow and high levels of pollution. The environment statement also shows that many walkways will be excessively windy. The building of the Gateway will prevent the Quaggy and Ravensbourne rivers from being further opened. It will also make future public transport improvements – such as extending the DLR to Catford and beyond – impossible.

### 36 Cliffview Road

Wish to re-confirm objections. Cannot believe on seeing the artists impressions that the scheme is being considered. The blocks are too large and would dwarf the park alongside the Quaggy. Does not object to high rise buildings in principle if they are elegant buildings that would allow more ground area free for parks and landscaping but this scheme crams too much into the site.

The development is out of context and has no regard for listed building and conservation areas. Rivers should not be moved or culverted to enable development. Also concerned

about the lack of affordable and family housing. Believes a more considered scheme could enhance Lewisham.

### 38 Cliffview Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 60 Cliffview Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 43 Cressingham Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 10 Darling Road (2 letters)

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 1 Drake Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. There is an opportunity not to degrade the area for financial gain. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the

QWAGs proposals and can see no business case for more shops and offices and would like to see a simplified business case that can be understood. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 19 Eastern Road

Objects for following reasons:

Height of the buildings would ruin views, severe lack of green space, centre of Lewisham would become nothing more than a transport hub and the use of the buildings is unknown.

#### 21 Eliot Park

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 36 Embleton Road (2 letters)

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 99D Embleton Road (2 letters)

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 106 Embleton Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and



offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

## 28 Ermine Road

### Letter dated 7 August from Lewisham Gateway Action Group

Detailed planning permission for the roads and rivers should be refused because:

a) Traffic congestion is proven to get worse. Traffic speeds through the area of the site will decrease by 20%, causing still greater increases in tailbacks along approach roads. Loampit Vale, already close to saturation point, will be especially affected, although the models still do not take into account the other developments planned for the area and recently agreed by the Council, namely the new school and swimming pool, let alone all the development envisaged in the Area Action Plan. It is urgent that a cumulative assessment be made of all future transport needs for central Lewisham *before* any specific permission is granted for the proposed changes to the road layout at the Gateway site.

No viable strategy exists for encouraging greater use of public transport, even though the developers themselves pin their hopes for the Low H on such a 'modal shift'. There are no segregated cycle paths, bus lanes peter out at various points, and no new extensions to the DLR or tramlink can now take place. Increased numbers of buses are described in the supplementary material as 'aspirational' only. There is insufficient capacity on the trains to cope with the additional 5,000 plus residents planned for the immediate area, most of whom the developers expect to be commuters. Unrealistic and out-of-date data on rail capacity is still being used in the Supplementary Transport Assessment.

Air quality will deteriorate as a result of the operation of the proposed road layout. The data submitted shows that concentrations around the site will increase by up to 4%. Again, data on this remains unreliable while the traffic model and the impact on traffic flows is unverified. The estimates on air quality in the 'Environmental Statement Addendum' Appendix E do not appear to take into account increased congestion along approach roads which must result from the decrease in speed established in the 'Supplementary Transport Assessment'. The area is in an Air Quality Monitoring Zone, and air quality already breaches EU guidelines. A town centre park, new residential housing, a major new school, as well as open food stalls are immediately adjacent. In regard to these sites, air quality figures are given only for the school, and these show a 14% increase in the number of exceedences within a 24 hour period.

The Low H road layout remains deeply controversial. It was adopted without properly considering the alternatives, especially as regards the comparative impact of these on air quality and other environmental factors. In adopting the Low H, Urban Renaissance Lewisham appears to have contravened EU directive 97/11/EC of 3 March 1997 paragraph 7 (3) which states that *'information to be provided by the developer in accordance with paragraph 1 shall include at least ....an outline of the main alternatives studied by the developer and an indication of the main reasons for his choice, taking into account the environmental effects.'*

There was no proper traffic modelling done for alternative layouts, no estimates of air quality in different scenarios, nor of the development of additional sustainable transport solutions for the area. Information given to the public when they were asked to choose was incomplete and different from the current proposal.

Pedestrian routes around the site are 'pinched'. Connections between buses, DLR and rail are currently rated as very good and this development makes no improvements to this rating. However, with the development, it will take pedestrians longer to go from the stations to bus stops for buses out of Lewisham and gaps between some bus stops are increased. Claimed savings of 20% in pedestrian journey times between transport nodes within the Gateway (para 10.11 of the Environmental Statement Non-Technical Summary) are not substantiated in Table 8.1 of the Supplementary Transport Assessment.

Improvements in pedestrian connectivity and the overall pedestrian environment is one of the key objectives of the 'Development Brief'. Not only will routes be crowded but air quality will be worse especially at some bus stops while, as a result of the high-rise development the site is 'excessively' windy in key retail and leisure areas: sunlight and daylight within the site has not been modelled at all.

Rivers are not naturalised, and, in violation of all guidelines on culverting, the Ravensbourne is pushed completely underground for 40m. The effects of this on wildlife habitat have not been assessed in the application. A major opportunity for making the most of the confluence of the two rivers as a unique element in Lewisham's identity will be lost forever.

Flooding and drainage remains a concern. The area falls in the Environment Agency's 1 in 75 year event indicative flood plain, but the models used by the developers test only for a 1 in 100 year event. Figures for surface water run-off do not appear to have taken into account the loss of 72% of the current green space which the development involves.

Also urge the Strategic Planning Committee to refuse outline planning permission for this application for the following reasons:

To submit outline planning application for tall buildings is contrary to all existing guidelines – in the London Plan and those published by CABE and English Heritage.

Claims that the development will lead to 'regeneration' are false because:

Job creation is minimal and incorrectly cited in the documentation.

"Affordable housing" is well below any guidelines and is not guaranteed but will be made dependent on the developers' profit levels.

No social, rented housing is provided. The Council refuses to make an estimate of the impact of the scheme on existing traders and the street market. This appears to contravene EU directive 97/11/EC which requires that a description be provided of the "material assets" "likely to be significantly affected by the proposed project".

We reiterate that a retail impact assessment should be made, as it is difficult to see how a development of this size would fit within any town centre without ripping out its heart. Until we have better estimates of the impact of the new retail provision on existing retail provision we will not have a clear idea of the overall economic costs and benefits of the scheme.

All other amenities are subject to a profit being made from their provision – 'market favourability'. Given the huge and rising costs of the development, profits will need to be very high to secure their provision. At a time of uncertain economic trends this makes the whole project financially risky for the developers, Lewisham Council and the people of Lewisham.

The supplementary material makes clear that economic benefits will not accrue from this development at all but from the further investment it may or may not encourage.

However, it should be noted that further investment will magnify all the negative effects detailed, but these have not been addressed. Positive benefits are purely speculative while, as the next paragraph shows, negative impacts are real and significant.

In addition to the traffic gridlock and loss of open rivers the following major negative permanent impacts will obtain (*italics indicate quotes from the application documents*):

*“Increased noise level as a result of the operation of building services plant;”*

*“Noise levels would put development in NECs A-D for which planning permission would normally be refused;”*

*“Without development annual mean limit for NO<sub>2</sub> is likely to be exceeded in 2012. The development will further enhance these levels by up to 4%. No mitigation measures available other than... measures to encourage to sustainable modes of transport.”* But para (b) above shows there have not actually been provided. Increase in pollution levels is a basis for refusing planning permission;

Windy conditions created by high-rise blocks in the maximum scheme means that *“to the north of block A, in Confluence Place, along the main retail area between blocks C and D and along Rennell Street, conditions would no longer be acceptable for their intended use “*. This uncomfortable pedestrian environment is against all the intentions of the development and makes refusal of planning permission for the maximum scheme imperative. Loss of green space and Metropolitan Open Land specifically protected in Lewisham’s UDP, Local Development Framework and the London Plan. Likely de-watering of Palaeolithic deposits and burial ground and removal of pre-historic stone which was the foundation stone of the Lewisham medieval bridge;

*“Urbanising effects at night time likely to give rise to generally adverse effects”*

There is loss of views from all the surrounding areas; and conservation areas and a listed building are overshadowed and their surroundings blighted. The new ‘Outline Planning Energy Statement’ shows that the crowded, high density development on the site inhibits the use of certain types of renewable energy such as wind turbines and solar photovoltaic cells. The scheme fails to address the urgent need not just for reduced carbon emissions, but for carbon neutral development – the developers give a nod in the direction of environmental concerns rather than making these intrinsic to the conception;

In conclusion, in spite of all the detail submitted in April 2006 and June 2007, there is no indication that the application addresses the aspirations expressed by Lewisham people in 2002, nor those stipulated in the Development Brief approved by Urban Renaissance Lewisham

#### Letter from resident of 28 Ermine Road

There are no clear benefits to the public from this scheme at all. The only benefits appear to accrue to the developers, who gain a parcel of land with outline planning permission. Even they will have marginal profits, as close reading of the application documents shows, because of the enormous infrastructure costs of moving the roads, river and underground utilities. They are therefore likely to seek revised planning permission, to negotiate lax section 106 agreements in order to bolster the otherwise weak profitability of the scheme

We face an environmental disaster which requires immediate action by government across the world and at every level to secure a sustainable future for the planet. It is therefore completely unacceptable to even contemplate a scheme which will *increase* pollution, and that in an area which already breaches EU guidelines. Further, all building these days should be aiming at zero carbon ratings. This scheme tacks a few, unassured, suggestions for providing just 10% renewable energy. Further, felling of mature trees, destruction of valued open space, underground culverting of rivers goes against all recommended best practice from the Mayor of London, the Environment Agency and any other organisation concerned with protection of the environment.

Place great emphasis on the importance of older buildings in assuring people's sense of place and heritage. Again these are dealt with shabbily in this development, conservation areas, a listed building and a lovely row of Victorian shops with historic importance are blighted. Views from Hillyfields, fought for 110 years ago by far-sighted philanthropists, will begin to be eroded, and, once the skyline is breached, we can expect a swathe of tall buildings through to Catford which will obliterate the sense of space in the view to Shooters Hill. Any assertions to the contrary in the application are simply unsupported.

Appalled at the money poured into just the pre-development of this scheme. While Lewisham Council, and other bodies spend this on speculative gains from the Gateway, many other parts of Lewisham are being run down. In Ladywell, a fraction of the money spent so far on the Gateway could have saved the Coroners' Court and the Playtower, giving these lovely buildings modern uses. A similar picture could be painted for many local neighbourhood shopping parades, not to mention our parks.

#### 42 Ermine Road (2 letters)

The objector notes similarities with the Green Man PH planning application in which she feels the Council are taking an opposing to view to Lewisham Gateway. In particular she notes that the density is higher for Gateway, would block views of the listed St. Stephens Church, right turning traffic would be unsafe and the buildings would be excessively large and out of character with surrounding development. The creation of jobs should not be used as an argument as minimal new jobs would actually be provided. The scheme should be refused for the same reasons as the Green Man.

Gateway scheme based on a modal shift which assumes public transport has the capacity to take on the extra population, which it does not. Questions reliability of averages taken for train capacity which in experience the objector notes is higher than 17 people standing, instead being 37 on some days. Average should be taken over 7.30 to 8.30 rather than up to 10. Average statistics will also include Victoria trains which are not as busy as London Bridge services. Would like confirmation that rail capacity modelling has included increases in passenger numbers from development further down the line and that only trains travelling to London have been counted. Additional uses not an attractive alternative due to grid-lock from low H road system. DLR is also not attractive alternative. The modal shift will not happen and proper capacity modelling must be taken into account before any development is approved.

#### 47 Ermine Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. She is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings and the close proximity of people living together, is opposed to reductions of air quality which should be counteracted by more tree planting,

is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land which is twinned with Charlottenburg in Berlin and has a tree commemorating this which has recently disappeared, supports the QWAGs proposals and can see no business case for more shops and offices. Believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 69 Ermine Road (2 letters)

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 79 Ermine Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 91A Ermine Road

Opposed to the scheme because of the high rise blocks which would result in the loss of Lewisham's individual character. High scale developments of the 60s and 70s had detrimental social effects. Troubled that old buildings would be demolished and the Ladywell Swimming Baths replaced with a basement pool. Does not seem to offer any additional public amenities and would involve the loss of green space. Will have an adverse impact on jobs and businesses, including the market. Not against a sensible development that would preserve and enhance the area but does not believe that Gateway would benefit local people.

#### 7 Fossil Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way. Does not wish to see Lewisham turned into Croydon style wasteland. Such developments on the south-east are being pulled down now.

#### 12 Fossil Road

Lewisham Gateway should have a pedestrian and cycle path along the rivers as part of longer term aim of linking Catford and Hither Green with Deptford. The respondent has provided a diagram of how cycle routes could link up.

### 21 Fossil Road (2 letters)

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 35 Foxberry Road

It would be impossible to get a bus or direct route to the DLR station. There is already insufficient green space in the town centre and the blocks would blight an already overcrowded area. Suggest that Lewisham and Lewis Grove are made one way towards Lee High Road. Other vehicles would turn to Molesworth Street to turn left into Loampit Vale with a turnaround point opposite the car park entrance. The roundabout should be replaced with traffic lights and an underpass put in direct to the DLR. The precinct side of Molesworth Street could be used for all vehicles as an exit out of the town centre.

### 73 Foxborough Gardens

While generally in favour of removing the roundabout and redeveloping the town centre, objects to the current proposal because of the height of the buildings which would foster anonymity rather than community, lack of dedicated cycle lanes, density, loss of open land, inadequate pedestrian crossings. The number of buildings should be reduced in favour of more recreational area. Not enough consideration given to families with type of units geared towards young professionals.

### 19 Gilmore Road

The public consultation is less than transparent in how it describes the final outcome of development with illustrations across wonderfully landscaped parks which are not connected to the development. Illustrations also fail to show overshadowing from buildings and show useable space which because of wind effect it is unlikely to be.

Concerned about isolation of the Quaggy. Supports QWAG's proposals and objects to the loss of MOL. The road system would not improve the current situation and would harm air quality further because of congestion. Danger of building so close to rivers because of potential for flooding. The scheme should be scaled down and cheaper improvements made to improve the roundabout.

### 35C Gilmore Road

Yet to be convinced of the value to Lewisham. Strongly opposed to high rise buildings especially as they would change the rivers and not enhance them. Supports QWAGs proposals. Objects to the replacement of Metropolitan Open Land and can see no business case for more shops and offices

Believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 14C Granville Park

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 16D Granville Park

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 72C Granville Park

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 5 Chesterfield Court, 76 Granville Park

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 28 Hither Green Lane

High density development would increase congestion with underground car parking harming the pedestrian environment, no identified employment gains and questions the need for more business space as Citibank is empty. No assessment of the impact of the plan on the rest of Lewisham and feels that the peripheral areas of Lewisham may decline if people move into the development. Horrified with the height of the buildings which would spoil the opening up of the rivers. Need a sustainable development.

Lack of flexibility in the plans and will increase congestion thereby lowering air quality. Affordable housing provision inadequate and not geared towards families. Renewable energy seems tokenistic and should be a central part of the scheme and a showcase for a zero carbon footprint development. Scheme involves unnecessarily complicated changes to infrastructure which has to be compensated by over dense development.

#### 55 Ladywell Road (2 letters)

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

Building of homes for 2000 people with no guarantee that any would be affordable, will lead to overcrowding on trains. The Council's own experts have concluded traffic would worsen and therefore more pollution. There would be a loss of green space and missed opportunity to open up the rivers. Has seen protected species in neighbours gardens.

#### 57 Ladywell Road

consider the development to be a gross overdevelopment of the area and so many tower blocks are unacceptable. Also believes that the road system would make congestion worse. Putting more lengths of the river in culverts is against policy. The suggested design of the tower blocks does not indicate that the housing will be affordable and suitable for families which is what Lewisham most needs.

#### 6 Lewisham Hill

Supports the objections of the Lewisham Gateway Action Group but emphasised particular objections relating to absence of segregated cycle paths or extensions to the DLR or tramlink, insufficient train capacity, absence of credible plans for flooding or drainage, absence of any 'eco-architecture' or green roofs, no social housing, no consideration of increased noise levels, detraction in sunlight and daylight and increase in wind, no wildlife impact evaluation, the loss of the confluence of the rivers and culverting of the Ravensbourne, loss of green space and loss of views and overshadowing from high buildings. She is appalled that Lewisham appears as a 'poor relation' in architecture terms to the rest of London and is stuck in a planning ethic of brutalism and scrupulous meanness. Finds the proposal's lack of civic values, good business sense and simple respect for the community despicable.

#### 23a Lewisham Park

Had previously supported the scheme but had not fully realised the implications of the development and feels that she has been misled about the scale of buildings and loss of green space. Now opposes the scheme. Concerned about traffic problems increasing and feels that the Council should be aiming to improve the environment, preserve green space and open up the rivers, encourage people to cycle and use public transport. No evidence that the new development would encourage a thriving local arts and social scene, especially as the cinema is not a definite commitment. An alternative scheme could improve the area.



### 85 Morden Hill

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 12 Oakcroft Road

Disappointed that the revised details confirm there would be no set down for Station Road as much needed for the elderly and those with children or luggage.

### 68A Overcliff Road

The supplementary material does not change previous objections and has made the scheme even more vague. Much of the material relating to further highway modelling work has not been made available to the public. There is no evidence that the concerns of Hyder Consulting regarding the fact that buses had not been included in the TRANSYT models has been addressed and appears that the request by TfL that traffic models should be extended to include the junction with Loampit vale and Jerrard Street has not been acted on. Even with omissions, the TRANSYT models show that east bound traffic at the junction with Loampit Vale and Molesworth Street will reach 94% saturation. Seems clear this is gross underestimate and the low H system will cause traffic to reach a standstill making surrounding streets a rat-run. With a 94% saturation, the proposed development to Loampit Vale including the swimming pool would not be feasible and any development there would push the system beyond capacity.

The mix of units could be entirely 1 and 2 beds with 20% affordable, well below local and national guidelines, contrary to PPS3. The development is ill conceived, will not regenerate Lewisham town centre but will result in an oppressive unworkable eyesore that will blight the surrounding area for years.

### 14 Romborough Gardens (2 letters)

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 27 Sandy Hill Road

The site would become a building site for 7 years if approved which would harm local businesses. No-one would want to visit the completed scheme because of the high rise buildings, worsening of the traffic system and poor air quality. No guarantee of affordable housing. Plan does not improve access between the transport interchange or improve the general environment. Reduction in green space at odds with results if public

consultation. Artists impression of confluence place does not show the effect of tall buildings on light and wind intensity and would not be a comfortable place to sit out in, even in the summer. Application destroys Lewisham as a locality and a simpler scheme would be better for Lewisham. Restoring the rivers within a parkland setting would be more appropriate. The focus should not be on high density in urban areas and green policies would still enable the centre to grow economically.

#### 1 Somerset Gardens

Acknowledge the need for extensive regeneration and redevelopment in this area the objector is concerned about the scale and mass of the development as well as the lack of design detail. The mass and scale appear to be out of keeping with the density in this area, both with regard to the existing urban grain and impact on local resources. The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. Opposed to moving rivers especially to accommodate high rise buildings. The rivers should be the principal focus for the development, exposed and a key part of a generous public domain. Would like to see clarification that the development will adhere to GLA guidelines on affordable housing. In favour of high quality offices and retail as well as units that favour local start-ups and would like to see this as an integral part of the development. Concerned that the plans are to be on show to residents after the deadline for objections. The proposals should have been better presented to the public as in the seven months the objector has lived in the Borough, the main information has come from a campaign group against the scheme.

#### 4 The Orchard

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

#### 48 The Woodlands

The Borough needs low rise affordable housing rather than profit making high rise blocks. Concerned about the capacity of sewers and impact of additional electricity and water use on global warming. Question the capacity of trains. Improve rivers but do not move them to place buildings, The Council should consider a cheaper scheme and improve the roundabout rather than wasting money on high rise buildings that benefit developers and shareholders only.

#### 68 The Woodlands

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and

offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 31C Tyrwhitt Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way. The objector has lived in SE London for their whole life and this is the worst development they have seen proposed.

### 54 Tyrwhitt Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 6C Vicars Hill

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 36 Vicars Hill

See no proof that the road system will work and fears traffic would get worse, especially given other developments planned. Only objective seems to be making money but Lewisham would be blighted. Vicars Hill is in a poor state of repair and instead of spending money to repair it traffic on the road would increase during development. Pollution would increase and there is not enough affordable housing. Believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### 44 Vicars Hill

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land,

supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way. The Council have not given residents a fair and balanced view of the development and have sought to cover up unpalatable aspects of it trying to conceal their incompetence with the roundabout scheme. The only reason the land is being made available is because they cannot fund the corrections needed to the roundabout.

### 80 Wearside Road

The objector sees no proof that the proposed road system will work and fears that traffic will get worse, especially given all the other developments proposed. He is opposed to moving rivers, especially if it is to accommodate high buildings is concerned about the principle of high rise buildings, is opposed to reductions of air quality, is appalled about the lack of affordable housing, objects to the replacement of Metropolitan Open Land, supports the QWAGs proposals and can see no business case for more shops and offices. He believes that a cheaper scheme for replacing the roundabout should be promoted without blighting the area in such a permanent way.

### External Consultees

#### English Heritage

The application should be determined in accordance with national and local policy guidance and on the basis of own specialist conservation advice.

#### Hilly Fields Park User Group

Increased concentrations of people would put the park under greater pressure due to its proximity to the site. Concerned about views from the park which are protected in UDP policies. This would erode the sense of place and undermine amenity.

#### Land Securities

Support the development as owner of the neighbouring Shopping Centre. Consider the development of the site as a vital enhancement to the linkages between the transport interchange and town centre and therefore a positive benefit to the long term future of retail and the vitality and vibrancy of the town centre. Believe the increase in retail will serve to increase the draw of Lewisham as a shopping destination.

#### LB Greenwich

Acknowledgement of additional details.

#### London Cycle Network

A TfL study by WSP, issued in July 2006, consultants along the A20 corridor identified options and recommended measures to address the needs for cycling on LCN+ Link 143 (A20 New Cross to Yorkshire Grey Roundabout, via Loampit Vale and Lewisham High St). This document is not included in consultation information. These measures should be included as part of the planning application proposals for this section of TfL highway.

Section 5 of the design guidance there is no inclusion of measures required for cycle users to be able to access the proposed development. Recommends the following measures should be provided to ensure the LCN+ is catered for along this section:

Cycle lanes or cycle tracks should be provided on 30mph roads where traffic flows are greater than 8000 vehicles per day (based on two way flows).

Toucan crossings are required to connect the existing cycle track on Molesworth Street to Lewisham High Street to provide safe and direct connection for eastbound cycle users onto Link 143 and also to the new Lewisham Gateway development. Also westbound cycle users from the new connecting road, between Loampit Vale and Lewisham High Street, should have the opportunity to access the existing cycle track on Molesworth Street. LCN+ recommend drop kerb (2.7metres wide) and shared area on the western footway at the junction of Molesworth Street junction with Loampit Vale.

No dimensions are shown on the plans. LCN+ recommend bus lanes along Lewisham High St are minimum of 4metres width. Particularly through pinch points.

There is no facility along the southbound side of Loampit Vale (towards Molesworth Street junction) to protect cycle users from been squeezed between the proposed traffic lane and bus lane along this section. LCN+ recommend a further review of this section, an example of good practise for this type of arrangement can be taken from bus and cycle facilities on Waterloo Rd on northbound approach to junction with York Road

Recommend cycle parking be provided at easily accessible and strategic locations, including outside the entrance to Lewisham DLR. Also on the road connecting Loampit Vale with Lewisham High Street LCN+ recommend cycle parking be provided along the southern footway either side of the proposed pedestrian crossing.

### The Green Party

Support in principle the regeneration of Lewisham Town Centre to improve the pedestrian links from the rail station to the town centre; to make the river more accessible and a key feature in the town centre; and to provide high-density housing given that good public transport links make this a suitable site for accommodating Lewisham's growing population. We believe that making Lewisham a more attractive shopping venue will help encourage more people to shop locally and reduce the number of journeys to other town centres and out of town shopping centres. We also welcome plans to improve bus facilities to help accommodate the expected increase in bus usage. However, they have a number of serious concerns about the current proposals that need to be addressed.

- Concerned that currently only 20% of housing is proposed to be affordable;
- The plans need to ensure the provision of safe cycle routes around the Gateway;
- Concerned that the Supplementary Transport Assessment is underestimating the number of cycle trips in its predictions;
- Given the air quality monitoring reports and future air quality projections for the site a development with extensive car parking provision will merely add to traffic problems and exacerbate the already poor air quality in the area. Therefore call for a significant reduction in the 500 private parking spaces;
- Call for exemplary standards in sustainable design and construction
- Ideally, a zero carbon development but at the very least the Mayor's London Plan policy of at least 10% on-site renewables (due to be increased to 20%) must be

delivered.

- Support high density housing on this site in principle but this is subject to being convinced by full daylight, shadowing and wind reports and the buildings being of high quality and sustainable design. Planting and other mitigation measures such as terracing to deal with excessive windiness must be required in the Confluence Park. Also require further clarification about whether the proposed level of housing density can all be accommodated given the range of different facilities planned for this site;
- Concerned by the loss of the children's play area in the Shopping Centre
- support improved shopping facilities but do not wish to see Lewisham just becoming more of a "clone town";
- Support proposals to remove parts of the rivers from concrete channels and place them in a natural setting but we share the concerns of the Quaggy Waterways Action Group that the opportunities for improving riverside access have not been maximised and the plans need to be modified to improve upon this. It is important that there is no overall loss of public open space, and specifically that levels of accessible green space should at least be comparable to existing levels

### The Ladywell Society

The Gateway scheme should not be considered in isolation from other proposed developments in the area. Parts of the application seem to be at odds with policy which would set a dangerous precedent. A decision can only be made when the Travellers have been relocated. The site is adjacent to the St. Stephens Conservation area which would be severely harmed.

The Society object to the outline nature of the application which they state is contrary to CABE/English Heritage guidelines. They are concerned that the exact heights of buildings have not been confirmed because of the nature of the application which has minimum, optimum and maximum scheme. They are concerned about views from Hilly Fields of the tall buildings.

They object to the loss of open space, part of which is MOL, and feel Confluence Place should not be seen as a 'trade off.' They object to the culverting of the river to enable the changes to the road system. They note that the development may be at risk from flooding.

Concerns have been raised about the road layout and effect increased traffic congestion and gridlock would have on air quality. They therefore oppose the road configuration.

The Society question the pedestrian safety of the route from Rennell Street into Molesworth Street from right turning traffic as it may be unclear if cars were wishing to turn into the development, Rennell street or do a u-turn back to Molesworth Street. They feel that the single crossing in the centre of Rennell Street could become blocked by standing traffic and question whether one crossing only is adequate. They consider people would wish to cross at the ends of Rennell Street to access the shopping centre.

### QUAG

The eastern part of the River Quaggy was split off from the main site and is to be the subject of a separate planning application. These applications are inextricably linked and should be considered together but the application is yet to be lodged. Planning Services agreed that this must happen and should honour this agreement.

## APPENDIX A3: RELEVANT PLANNING POLICIES

### LB LEWISHAM UDP (ADOPTED JULY 2004)

The following are considered the principal policies of relevance in the determination of the planning application for Lewisham Gateway

#### **URBAN DESIGN AND CONSERVATION**

##### **URB 1 Development Sites and Key Development Sites**

The Council wishes a high standard of design and townscape quality to be achieved on all development sites. Also sites that contribute to the image of the Borough, by reason of their location or size, are identified as Key Development Sites.

##### **URB 3 Urban Design**

The Council will expect a high standard of design in new development or buildings and in extensions or alterations to existing buildings. Schemes must also be compatible with or complement the scale and character of existing development and its setting.

##### **URB 5 Design and Location of High Buildings**

The Council will consider applications for high buildings, and applications should be of outstanding architectural quality and should comply with the various stated criteria.

##### **URB 7 Access to Buildings for People with Disabilities**

Development of buildings, open to the public and used for employment and education purposes should provide suitable access for people with disabilities.

##### **URB 12 Landscape and Development**

Applications for development should, where appropriate, include landscape proposals for all areas not occupied by buildings, and be based on a landscape appraisal which takes note of the relevant site features, such as trees or protected or rare species.

##### **URB 18 Preserving Listed Buildings**

The Council wishes to preserve and enhance Listed Buildings and their features of architectural or historic interest.

##### **URB 21 Archaeology**

The Council will promote the conservation, protection and enhancement of the archaeological heritage of the Borough.

##### **URB 22 Important Local Views and Landmarks**

Development which impedes or detracts from Local Views or obscures existing views of Local Landmarks will be assessed against the criteria in the Conservation Area and Listed Buildings policies, but will generally be resisted.

#### **OPEN SPACE**

##### **OS1 Metropolitan Open Land**

The open character of MOL will be preserved. Planning permission will be granted only for appropriate development or change of use where this preserves the open nature of the land.

## **OS2 Land Close to Metropolitan Open Land**

The Council will consider any development proposal on land fringing, abutting or otherwise having a visual relationship with MOL on the basis of their detrimental impact on visual amenity, character or use of the MOL.

## **OS 6 River Corridors**

The Council will seek, where appropriate, to protect, enhance and restore the natural elements of the river environment.

## **OS 12 Nature Conservation on Designated Sites**

Development on or within Sites of Nature Conservation Importance, will not be permitted if it is likely to destroy, damage or adversely affect the protected environment.

## **OS 13 Nature Conservation**

The Council will seek to protect and enhance the nature conservation value of all sites, through the imposition of planning conditions or through ensuring alternative equivalent new habitat provision nearby.

## **ENVIRONMENTAL PROTECTION**

### **ENV PRO 7 Environmental Impact Assessment**

Where a development is considered to have significant likely effects upon the environment by virtue of factors such as its nature, site and/or location, a statutory environmental statement will be required to be submitted with the application.

### **ENV PRO 8 Air Quality Management Areas**

Any significant development proposed within an Air Quality Management Area (AQMA), as identified by the Council, will be required to include an assessment of its likely impact on air quality.

### **ENV PRO 11 Noise Generating Development**

The Council will resist development that could lead to unacceptable levels of noise. A noise impact survey maybe required, outlining possible attenuation measures.

### **ENV PRO15 Sustainable Surface Water Drainage in New Development**

Where appropriate surface water should be disposed of as close to source as possible, or be attenuated before discharge to a watercourse or surface water sewer.

### **ENV PRO 19 Energy Efficiency**

Developments should have regard to the principles of energy and natural resource efficiency through their design, orientation, density and location.

## **HOUSING**

### **HSG 2 Housing on Previously Developed Land**

In the interests of achieving sustainable development the re-use of previously developed land will be promoted. The Council will normally consider housing as its preferred alternative land use.

### **HSG 3 Provision of Housing Sites**

The Council will aim to exceed the Governments target of 8,400 dwellings between 1992 and 2006 and will work towards providing a minimum of 11,000 units between 1997 and 2016.



**HSG 4 Residential Amenity**

The Council will seek to improve and safeguard the character and amenities of residential areas throughout the Borough.

**HSG 5 Layout and Design of New Residential Development**

The Council expects all new residential development to be attractive, to be neighbourly and to meet the functional requirements of its future inhabitants.

**HSG 6 Dwelling Mix**

The Council will seek a mixture of dwelling sizes in the case of residential developments of 15 units or more. The mix will be determined by reference to the housing needs of the area, the nature of the development and its proposed relationship to the surrounding area.

**HSG 13 Affordable Housing**

The Council will continue to work with housing associations and private housing developers to provide a minimum of 2,800 affordable units between 1997 and 2016.

**HSG 14 Provision of Affordable Housing**

The Council will negotiate for an element of affordable housing to be provided on any site of 0.5 hectares or more or capable of accommodating 15 dwellings or more that comes forward for housing development and including mixed use sites.

**HSG 15 Creating Viable and Balanced Communities**

The Council will seek, in agreement with developers, for the affordable housing contribution to be provided in a way which assists in securing a more balanced social mix.

**HSG 16 Density**

New residential development should normally be built within a density range of 180-210 habitable rooms per hectare. Higher densities may be acceptable within specific criteria.

**HSG 22 Consultation on Housing Developments**

The Council will consult the public, the Design Conservation Panel, the Amenity Societies Panel, landowners, developers and where appropriate adjoining boroughs in the preparation of Planning Briefs, other planning studies including Conservation Area designation, and on development applications for housing development.

**SUSTAINABLE TRANSPORT AND PARKING****TRN 1 Location of Development**

Proposals that generate a large volume of traffic or person movement must be located close to good public transport facilities or where this can be provided as part of the proposal.

**TRN 2 Travel Impact Statements**

The Council will require Travel Impact Statements, which assess the likely travel movements by all modes and their impact on congestion, safety, and the environment of the surrounding area.

**TRN 3 Developer Contributions**

Contributions to highway improvements or traffic management measures and to public transport services or facilities or other measures to improve accessibility by pedestrians or cyclists will be sought from developers.

**TRN 4 Access for Public Transport**

Developers of major schemes should provide road and footpath access that takes account of the requirements of public transport providers.

**TRN 5 Green Travel plans**

The Council encourages business or organisations that either employ or attract a large number of visitors to draw up Green Travel plans. An S106 may be sought on this matter.

**TRN 10 Protection and Improvement of Public Transport**

The Council will support the provision of public transport by assessment of specific criteria.

**TRN 14 Cycle Parking**

The Council will negotiate provisions for cycle parking.

**TRN 15 Provision for Cyclists and Walkers**

Developments should make good provision for users and visitors to cycle or walk to and from the development including cycle parking and storage facilities.

**TRN 16 Developing Pedestrian and Cycle Networks**

The Council will implement the Strategic Cycle Network and the Strategic Walking Routes as shown on Map 6.3.

**TRN 26 Car Parking Standards**

The Council will require the provision for off street parking in accordance with specific standards.

**EMPLOYMENT**

**EMP 1 Land and Premises for Employment Purposes**

The Council will aim to ensure a satisfactory supply of land and premises for employment uses.

**SHOPPING AND TOWN CENTRES**

**STC 2 Location of New Stores (Sequential Test)**

The Council will grant planning permission for additional retail use, and in particular substantial additional retail in the Major and District Town Centres.

**STC 12 Mixed Use Development**

The Council welcome development proposals which involve appropriate mixed use schemes or a compatible mix of uses within close proximity to each other and are well served by public transport.

**LEISURE, COMMUNITY FACILITIES AND EDUCATION**

**LCE 4 Places for Children to Play**

The Council will seek to provide attractive, safe and accessible places for children to play.

## **IMPLEMENTATION, RESOURCES AND MONITORING**

### **IRM 3 Community Benefit and Planning Loss**

Where appropriate, the Council will expect planning applications for built development to include proposals which:

- (a) deal with the fair and reasonably direct and indirect infrastructural requirements of the development;
- (b) will ensure that there is not a consequential and significant planning loss to the existing community subject to; :
- (c) it being understood that the proposals for community benefit can vary according to the impact of the proposed development;
- (d) the effects of development being assessed, where relevant, in combination with those from other related proposals;
- (e) the proposals being secured by a planning condition or obligation, or other legal agreement or undertaking