

Committee	Sustainable Development Select Committee	Item No. 4
Report Title	Local Development Framework – Lewisham Town Centre Area Action Plan	
Ward	All	
Contributors	Head of Planning	
Class	Part 1	Date: 15 March 2012

1. Purpose of the report

- 1.1 The Lewisham Area Action Plan (AAP) sets out the local planning context for the major town centre of Lewisham. The AAP identifies the vision and strategic objectives for the town centre and establishes a number of policies that will manage the delivery of development and guide interventions by the private, public and third sectors.
- 1.2 The purpose of this report is to inform the Sustainable Development Committee of the progress in producing the AAP and seek the views and comments of the Committee. It should be noted that both the AAP and the accompanying sustainability appraisal (SA) have been reviewed and approved for public consultation by Mayor and Cabinet in February and Full Council on March 3rd 2012. They are both attached as appendices.

2. Recommendation

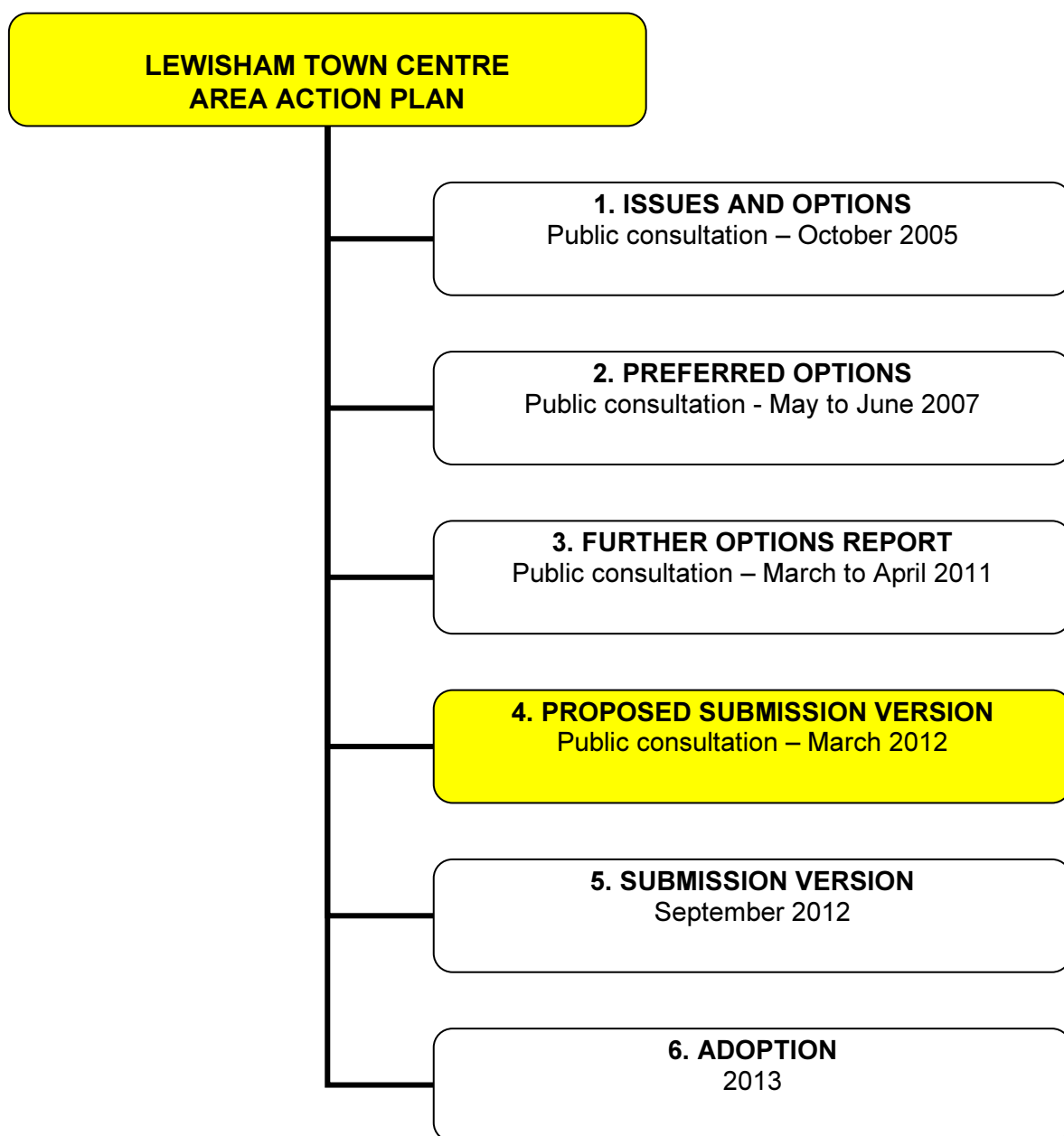
- 2.1 Recommended to note this report.

3. Introduction and background

- 3.1 Members will be aware of the ongoing preparation of the Council's Local Development Framework (LDF), including the adoption of the Core Strategy in June 2011. The Core Strategy Spatial Policy 2 identifies Lewisham town centre as a "Regeneration and Growth Area" which will support major development of residential, retail, leisure and employment uses. It also states that the Council will prepare and area action plan (AAP) to support and manage the forecast growth.
- 3.2 The Lewisham AAP sets out a vision and objectives for the town centre that are guided by the principles of the Core Strategy. Further, it provides a strategy, a series of policies and a delivery framework to guide public and private sector investment over the next 5 – 10 years and facilitate regeneration.

- 3.3 The emerging AAP has already been the subject of three rounds of public consultation.
- Issues and Options (October 2005)
 - Preferred Options (May June 2007)
 - Further Options (March 2011)
- 3.4 Following this the AAP is currently a 'Pre-Submission Plan' which will go through one further round of public consultation in March and April 2012. The document will then be submitted alongside any received comments to the Planning Inspectorate for an independent Examination in Public by a planning inspector.
- 3.5 The contents of this report are consistent with the Council's policy framework and the AAP contributes to the implementation of each of the Council's ten priorities. The AAP will help give spatial expression to the Sustainable Community Strategy (Shaping Our Future) (SCS) 2008 and will play a central role in the implementation of the SCS vision '*Together we will make Lewisham the best place to live, work and learn*'. The AAP will also help implement a range of other Council policies and strategies as well as the strategic aims of the Resources and Regeneration directorate.
- 3.6 The AAP has been prepared so as to be consistent with national planning policies and to be in general conformity with the London Plan and the Core Strategy.
- 3.7 The AAP is based on a number of evidence documents that have been prepared to provide local data and research relevant to the town centre and the wider borough. The evidence relates to a number of topics including, housing, employment land, retail, renewables and energy, waterways and flooding, open space, transport, design and community services.
- 3.8 The steps in preparing the AAP are outlined in Figure 3.1 overleaf. We are currently preparing for Stage 4.

Figure 3.1:



4. Recent progress in the town centre

4.1 A great deal of progress has already been made (or is underway) in the redevelopment of the town centre, including improvements to the built environment, the retail and leisure offer and public open space. These developments are contributing towards the vision and objectives of the emerging AAP.

4.2 Lewisham Gateway

'Lewisham Gateway' – the largest of the various individual town centre regeneration schemes – involves the removal of the roundabout opposite Lewisham station and

replacing it with a development that includes 800 homes, 17,000 sq m retail, 8,000 sqm office / business, 5,000 sqm hotel and 5,000 sqm of leisure.

Since October 2007, when the Council's strategic planning committee approved the outline planning application, legal negotiations have been continuing between the Council, the London Development Agency and the developer. The economic situation of the last few years has added an extra level of complexity to those negotiations, and at this time is not possible to say exactly when the main Lewisham Gateway development works will commence. However, discussions about the scheme's viability are continuing to take place.

In the meantime, all of the sites and buildings needed to deliver the scheme have been purchased and the necessary road closure orders agreed. The disused buildings on the sites to the north of Rennell Street and alongside the bus station have been replaced by temporary landscaping to significantly improve the appearance of this part of Lewisham.

4.3 Loampit Vale

Building work is now well underway on the 'Renaissance' development on Loampit Vale, which includes a new leisure centre, 788 new homes, a series of commercial units, some of which will be used by creative businesses and community facilities including a new venue for the Lewisham Christian Centre.

Some of the development is already completed and occupied whilst the remaining parts will be completed in phases between now and 2015, with the leisure centre due for completion in 2013.

Further, Prendergast Vale is under construction as Lewisham's new three and four-storey all-age school incorporating the former Lewisham Bridge school on Elmira Street, with a two-storey sports hall. The building is due to be completed ready for the autumn 2012 term.

This area has excellent sustainability credentials. The whole 'Renaissance' development, plus the Prendergast Vale School, will receive its heating and power from an on-site CHP and biomass energy centre.

Open space in the town centre was greatly improved by the completion of Cornmill Gardens and River Mill Park in 2007. The park provides access to the naturalised River Ravensbourne and well manicured lawns. Since it opened Cornmill Gardens has won, or been shortlisted for, a number of national design and landscaping awards, as well as a Green Flag award.

4.4 Conington Road

The 'Silkworks' development is now fully occupied while the adjacent 'Silvermill' development is nearing completion. In combination these developments total over 450 apartments. A re-landscaped Silk Mills Path public walkway is also now

completed which provides direct access between the town centre and Elverson Road DLR station (via Tesco's).

4.5 Lee High Road

A new LIDL store has finished construction and is now open at 104-120 Lee High Road. This development also includes three storeys of residential providing 57 apartments.

5. What does the AAP say?

5.1 The focus of the AAP is not to repeat borough-wide, London-wide or national policy, but to add to the existing policy context by dealing with those concerns that are locally specific and of significant importance to Lewisham town centre.

5.2 The Area Action Plan (AAP) is at the heart of regenerating the town centre. It demonstrates what is required to redevelop the area into a vibrant and successful centre, including improvements to shopping, living, working, and spending leisure time in the town centre. Further, the AAP will ensure individual developments support the town centre wide objectives, are well designed and environmentally smart and that relevant infrastructure needs accompany development.

5.3 The AAP has three sections to guide development:

- Firstly, Section 3 establishes the town centre boundary and introduces the spatial strategy for the town centre
- Secondly, Section 4 identifies six 'Town Centre Areas' (TCAs) and a number of key sites within them and provides local policies and guidance for each area and site
- Following this, Section 5 sets out a suite of policies that are relevant across the entire town centre.

6. The spatial strategy

6.1 The opening section of the spatial strategy is to identify the land boundaries where the AAP policies are relevant. It therefore defines the boundary of the town centre, the six "Town Centre Areas" and the 10 sites where development is focused.

6.2 Secondly, the town centre spatial strategy requires developers to demonstrate how their scheme will help deliver the AAP vision and objectives, whilst ensuring it is not a hindrance to the potential development of other sites. It encourages developers and landowners to work together and with public bodies to masterplan and construct a cohesive town centre.

7. Site specific policies

7.1 Much of the town centre has been allocated in to one of six “Town Centre Areas” (TCAs). These TCAs have diverse characters and each present different opportunities to enhance the social, environmental and economic health of the town centre.

7.2 Lewisham Gateway

Lewisham Gateway is identified as one of five strategic site allocations in the Council’s Core Strategy due to its scale and importance in delivering jobs, homes and other benefits. The site is the largest single development proposed for the Lewisham Town Centre and will deliver £250 million of public and private investment. However, a specific AAP policy for the Gateway site is not necessary as it is covered by the Core Strategy. Policy is specifically provided for the Kings Hall Mews site which adjoins Lewisham Gateway to the northeast and is currently occupied by a car yard.

The Lewisham Gateway Town Centre Area will deliver 800 homes, 17,000 sq m retail, 8,000 sqm office/business, 5,000 sqm hotel and 5,000 sqm of leisure.

Key area objectives are to:

- Promote high quality mixed use development befitting a metropolitan town centre
- Provide a safe, pleasant and convenient pedestrian environment connecting the station interchange to the High Street and Lewisham Centre
- Improve the transport interchange between buses, trains and DLR
- Celebrate the confluence of the rivers Quaggy and Ravensbourne

7.3 Loampit Vale

The Loampit Vale Town Centre Area forms the principal approach to the town centre from the west. It is a location of new town centre communities and high quality community facilities including a new public park, new leisure centre and new school. The area benefits from excellent public transport accessibility given its proximity to Lewisham Interchange and there is a major opportunity to provide new jobs, homes and essential community facilities. Key route and public realm improvements can enhance the potential for car-free development in a high quality environment.

Capacity for development exists across several sites and those still to be delivered have capacity for 1,000 homes and 11,200 sqm net retail.

Key area objectives are to:

- Provide new homes, shops, jobs and community facilities
- Complement the Lewisham Gateway development
- Mark the arrival to the town centre from the west
- Create a high quality active boulevard along Loampit Vale
- Improve north-south connections
- Improve pedestrian and cycling environment, particularly along Loampit Vale
- Enhance links with Lewisham station

7.4 Conington Road

Conington Road is immediately to the north of Lewisham transport interchange and is dominated by a Tesco store and a fragmented series of car parks. This is a highly sustainable location with very good levels of public transport accessibility. The River Ravensbourne runs through the area, while the Silk Mills Path provides an important pedestrian and cycle access route to the town centre. A number of developments have already been completed here.

Remaining development capacity in this area falls into the space where Tescos and its car parking are currently. Tescos are known to be keen to expand their store and improve the range of goods and services offered. The Conington Road area has the capacity for 400 homes and 3,000 sqm net retail.

Key area objectives are to:

- Improve links across the site to the Gateway site, Lewisham interchange and the River Ravensbourne.
- Enhance the ecological quality of river environment and ensure the river corridor is also improved to form a valuable public amenity.
- Provide improved retail services for the Borough's residents.
- Provide a balanced, high density neighbourhood.

7.5 Lee High Road

Lee High Road provides the principal approach to Lewisham Town Centre from the east. The nature of this area is distinct from that of the retail core of Lewisham, characterised by smaller retail units and independent specialist retailers. The area already constitutes a mixed and sustainable community, with some affordable housing located alongside more affluent residences.

Lee High Road is a traditional high street with continuous and varied ground floor retail (A1 and A3) uses, typically with several floors of residential above. It has a strong independent character and frontages are relatively short. In 2011, a large supermarket opened at the eastern end with 1,750sqm retail and 57 flats above.

The western end of the Lee High Road character area is still to be delivered and has the capacity for 40 homes and 2,000 sqm net retail.

Key area objectives are to:

- Protect and enhance the retail character and townscape qualities of the area.
- Create a more pedestrian friendly environment.
- Improve the ecological quality of the River Quaggy environment.
- Protect residential amenity for existing residents

7.6 Ladywell

The Ladywell Town Centre Area is the southern most part of the town centre stretching along Lewisham High Street from the end of the Hospital up to the railway bridge and along Ladywell Road from the junction with Lewisham High street up to the Ladywell Station Bridge.

The area is characterised by a historical concentration of civic and community facilities which form part of the St Mary's Conservation Area. Although the whole town centre is part of the Core Strategy 'Regeneration and Growth Area', the Ladywell Town Centre Area has a different nature to the rest of the town centre. The Council has undertaken a conservation area management plan for sections of Ladywell and as such it is in parts unsuited to wide scale growth. However, there are some key and important opportunities in the area that require consideration, in particular the Ladywell Leisure Centre will be surplus to requirements and brought forward for redevelopment once the new leisure centre opens on Loampit Vale.

The Ladywell Town Centre Area has the capacity to deliver 150 homes and 1,400 sq.m. net retail floorspace.

Key area objectives are to:

- Promote the Ladywell Leisure Centre site for redevelopment for an appropriate mix of uses including retail and residential.
- Conserve and enhance the heritage assets and community facilities that are prevalent in the area.
- Encourage further work to champion the area as an environmental champion.

7.7 Central

The Central Town Centre Area forms the core shopping area of the town, including the Lewisham Centre and the street market. The Town Centre Area also comprises land directly adjoining the north and south of the shopping centre, Molesworth Street and Lewisham High Street. Lewisham High Street is the economic heart of the town centre and its most important social space. It is also home to Lewisham's historic street market, and several churches, the clock tower and other heritage assets.

There are opportunities for development of the land adjoining both the north and south ends of the shopping centre, including the Citibank Tower. Development opportunities in the Central Character Area have the capacity for 200 homes and 600 sqm retail.

Key area objectives are to:

- To support and improve the vitality and viability of the Lewisham Centre
- To encourage a sustainable form of development, including an increase in centrally located housing
- To improve the quality and safety of the environment for all users
- To attract investment to Lewisham High Street
- To improve east-west permeability through the area
- To ensure continuation of the market's important role in meeting local needs
- To provide a more convenient trading environment for market traders

8. Area wide policies

8.1 The area-wide policies are a series of policies which are relevant to all the sites and Town Centre Areas, as well as across the wider town centre vicinity. These policies have been grouped into three themes, as follows, to align with the objectives of the Core Strategy.

8.2 Growing the local economy

This section details a number of key policies that are vital in protecting and enhancing the economic prosperity of Lewisham town centre. This includes a number of policies regarding the protection and growth of employment uses, housing and student housing options and the enhancement of the retail offer, including the street market and the evening economy.

8.3 Building a sustainable community

This section details a vital policies that ensure the delivery of redevelopment of the town centre that will benefit both existing residents and users and those for generations to come. Policies cover a diverse range of subjects such as urban design (including the public realm and tall buildings), sustainable transport, community needs and heritage assets.

8.4 Environmental management

This section details two policies that are key to the delivery of a number of the AAP objectives relating to environmental management and climate change. Firstly that of reducing carbon dioxide emissions and secondly the adaptation of the town centre to climate change.

9. Monitoring and Implementation

9.1 The AAP firstly explains the action and involvement the council will have in ensuring implementation. Secondly, the monitoring framework highlights the process for scrutinising the progress of the AAP and how and when monitoring and, if necessary, review of the plan will take place. Thirdly, there is a brief assessment of the main risks to the successful implementation of the AAP and where appropriate mitigatory and adaption measures are identified.

9.2 The list below details the aspects of delivery that the council will take into account to ensure the successful implementation of the AAP over the plan period:

- Site Allocation
- Pre-application Service
- Lewisham Design Panel
- Supporting Documentation
- LBL Owned Property
- Compulsory Purchase
- Infrastructure Delivery Plan

- Community Infrastructure Levy charging schedule.
- Local Implementation Plan
- Partnership Working
- Funding
- Flexibility

10. Sustainability Appraisal

- 10.1 A Sustainability Appraisal (SA) for the proposed submission AAP is included as Annex 2 to this report. The main purpose of the SA is to appraise the social, environmental and economic effects of the plan's strategies and policies. The SA also incorporates the statutory Strategic Environmental Assessment (SEA).
- 10.2 Each stage of the plan making process is accompanied by a sustainability appraisal, so that any potential negative impacts of policy decisions are taken into account at the decision making stage, and decisions can be seen to have been made in accordance with the principles of sustainable development.
- 10.3 The potential direct, indirect and cumulative impacts of the proposed submission AAP have been appraised and identified. The SA details that 'the AAP is likely to result in a number of social, economic and environmental benefits'. In particular, the proposals to provide housing and retail growth will contribute positively to the economic sustainability objectives, while public realm improvements will support both social, environmental and economic objectives.
- 10.4 The town centre is affected by medium and high levels of flood risk creating some conflict with the wide scale of planned development. However, the proposals will provide significant regenerative benefits and help fulfil Lewisham's wider economic and social objectives. The Sequential Test has been applied in accordance with government guidance and found that there are no alternate sites for this scale and type of development, while exception testing and mitigation measures will ensure that all sites are acceptable in terms of flood risk.
- 10.5 Another potential conflict identified was the policies seeking to retain/increase the amount of parking for shoppers in the town centre. This conflicts with the sustainability objectives to encourage sustainable modes of transport. However, easy access to parking is a key advantage to Lewisham town centre which differentiates its offer with other nearby competing retail centres, therefore it is considered essential to **retain** parking where possible.
- 10.6 Two of the key developments proposed in the AAP involve the loss of Metropolitan Open Land (MOL). However, the quality and function of this MOL is limited, and the loss of the land is mitigated through the re-provision of open space. The loss of MOL at these sites has been considered and appraised in detail as a separate process to this work.

- 10.7 It is a legal requirement that the council publish the Sustainability Appraisal alongside the AAP. In accordance with the SEA Directive, the government has designated that the Sustainability Appraisal report must be consulted with the Environment Agency; the Countryside Agency; and Natural England.

11. The Habitat Regulations Assessment (HRA) Process

- 11.1 The EU Habitats Directive (92/43/EEC on Conservation of Natural Habitats and of Wild Fauna and Flora) requires the Council to undertake an assessment of the implications of a proposed plan or project on designated European sites (classified as Special Areas of Conservation, Special Protection Areas and Offshore Marine Sites). The assessment process is known as a Habitats Regulations Assessment or HRA and is a separate (but complimentary) activity to the Sustainability Appraisal.
- 11.2 In the context of the LDF all Development Plan Documents (DPDs) and Supplementary Planning Documents are subject to the Habitats Directive. This includes the Lewisham Town Centre AAP. The purpose of HRA is to ensure that the integrity of European sites are protected through the planning process.
- 11.3 An HRA was carried out for the emerging AAP and concluded that the proposed site allocations were not likely to have significant effects on designated European sites (Lee Valley, Epping Forest, Richmond Park and Wimbledon Common). As such, only Stage 1 (screening) of the HRA process was required to be undertaken. This conclusion was supported by Natural England. Details can be found in the separate HRA Screening Report.

12. Legal Implications

- 12.1 The key stages and requirements in progressing the emerging AAP to adoption and the main legal implications are described in the body of this report.
- 12.2 The procedures which the Council is required to follow when producing a Development Plan Document (DPD) derive from the Planning and Compulsory Purchase Act 2004 (as amended), the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended) and Planning Policy Statement 12.
- 12.3 The function of approving DPDs is shared by Mayor and Cabinet and Full Council. The AAP together with the Sustainability Appraisal of the AAP Further Options Report must therefore be referred to Full Council for approval to undertake statutory public consultation.
- 12.4 The Council has adopted its Statement of Community Involvement (SCI) which sets out the minimum consultation that will take place and it is a requirement of a 'sound'

plan that the standards in the SCI are met. This will include statutory consultees, land owners, community groups and other interested individuals and groups.

13. Crime and disorder implications

- 13.1 The AAP proposes specific objectives and policies to help ensure that new development does not give rise to crime, fear of crime or public disorder and to ensure that the town centre is a safe, attractive and inclusive place. Planning applications for development will need to demonstrate how proposals meet these objectives and policies.

14. Equalities implications

- 14.1 The Equality Act 2010 (the Act) brings together all previous equality legislation in England, Scotland and Wales. The Act includes a new public sector equality duty (the equality duty or the duty), replacing the separate duties relating to race, disability and gender equality. The duty came into force on 6 April 2011. The new duty covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 14.2 In summary, the Council must, in the exercise of its functions, have due regard to the need to:
- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 - advance equality of opportunity between people who share a protected characteristic and those who do not.
 - foster good relations between people who share a protected characteristic and those who do not.
- 14.3 As was the case for the original separate duties, the new duty continues to be a “have regard duty”, and the weight to be attached to it is a matter for the Mayor, bearing in mind the issues of relevance and proportionality. It is not an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations.
- 14.4 The Equality and Human Rights Commission issued guides in January 2011 providing an overview of the new equality duty, including the general equality duty, the specific duties and who they apply to. The guides cover what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guides were based on the then draft specific duties so are no longer fully up-to-date, although regard may still be had to them until the revised guides are produced. The guides do not have legal standing unlike the statutory Code of Practice on the public sector equality duty, However, that Code is not due to be published until later in 2011. The guides can be found at:

<http://www.equalityhumanrights.com/advice-and-guidance/public-sector-duties/new-public-sector-equality-duty-guidance/>

14.5 The AAP DPD was the subject of a comprehensive Equalities Analysis Assessment (EqAA). This assessment was to ensure, as far as is possible, any negative consequences for a particular group or sector within the community are eliminated, minimised or counter balanced by other measures. This is considered to meet and address the strategic equality issues.

14.6 The AAP proposes specific objectives and policies to help ensure that new development complies with inclusive design principles to ensure that the town centre is a safe, attractive and inclusive place. Planning applications for development will need to demonstrate how proposals meet these objectives and policies.

15. Environmental implications

15.1 Environmental issues are at the heart of the planning process and all aspects are reflected in the emerging AAP. The report proposes specific objectives and policies to promote environmental sustainability, protect and improve publicly accessible open space, protect and enhance the Rivers Quaggy and Ravensbourne and ensure that the town centre can mitigate and adapt to the risks arising from climate change. The Sustainability Appraisal process also ensures that an explicit identification of the environmental impact of the proposed policies has been considered.

15.2 The specific environmental implications of the emerging AAP are in accordance with national and regional policy and have been evidenced through local studies assessing (but not limited to) open space provision, biodiversity, flood risk, and transport assessments.

16. Financial Implications

16.1 The costs associated with the printing, publishing and consulting on the AAP and the Sustainability Appraisal will be met from the existing Planning Services budget.

17. Conclusion

17.1 The AAP Pre-Submission version was approved for public consultation by Mayor and Cabinet on February 15th and by Full Council on February 29th. The public consultation period began on March 12th and runs until April 23rd.

Background Documents

Short Title Document	Date	File Location	File Reference	Contact Officer	Exempt
Planning &	2004	Laurence	Planning	Brian Regan	No

Compulsory Purchases Act 2004		House	Policy		
PPS 12	2008	Laurence House	Planning Policy	Brian Regan	No
LDF Regulations	2004 & 2008	Laurence House	Planning Policy	Brian Regan	No

If you have any queries on this report, please contact Brian Regan, Planning Policy, 5th floor Laurence House, 1 Catford Road, Catford SE6 4RU – telephone 020 8314 8774.