

Appendix 5: Issues raised from the consultation exercise

Surrey Canal Triangle SPD

Summary of Stage two Consultations

03/01/2020

Organisation - Statutory		Comment	Response
GLA	1	Supportive of much needed growth around the Surrey Canal Triangle area and recognises the positive contribution it can make to delivering development across London for industry, jobs and genuinely affordable housing.	Noted
	2	The draft SPD provides a comprehensive contextual analysis which is welcome.	Noted
	3	The area's relationship with London's central activities zones and opportunity areas could be set out and explored more clearly and fully, it is important that it links and responds to these too.	Noted. Pg 16 to include text on Lewisham, Catford and New Cross opp. areas - taken from the London Plan.
	4	It should be recognised that that the Mayor's strategic approach to London's industrial land has changed since the 2012 granted planning permission for mixed use employment. The London Industrial land study of 2017 says there will be a positive net demand over the period 2016 to 2041 and based on this evidence, the new London Plan identifies Lewisham as a 'retain capacity' borough in table 6.2. Lewisham should therefore be seeking to intensify industrial floor space.	In response to points 4, 5 and 6; Noted. The SPD seeks to increase the overall employment floor space offer, as part of a mixed use scheme. The site was designated through the appropriate routes and also identified as a housing zone by the GLA. Mixed use was accepted through the GLA's SHLA and identified as a key site contributing towards Lewisham's housing targets.
	5	Lewisham is also identified as being in the Central Services Area and boroughs in this area are expected to recognise the importance of providing essential services to Central Activities Zones eg. 'last-mile', administrative, printing and food related.	
	6	The Mayor recognises that the area has been allocated for mixed-use development and has extant planning permission but strongly encourages Lewisham to follow and implement, 'retain capacity' status due to it's location in within the Central Services Area.	

Appendix 5: Issues raised from the consultation exercise

7	The Local plan also sets out a requirement for 50% affordable housing where there is net loss of industrial floor space and this will inform the threshold for fast-track route status.	Noted
8	The Mayor welcomes that the draft SPD responds positively to strategic views set out in the LVMF. Sectional analysis or 3D modelling would give an indication as to the maximum heights. Guidance as set out in the London Plan policies should be followed.	The SPD sets out the key high level considerations. Lewisham does not consider it appropriate to be giving detailed guidance on height, this is for the planning process to assess when detailed designs are provided.
9	There then follows a tabulated description of more specific comments on pages of the SPD. Highlights are as follows;	
9a	Pg 7 - The role of the SPD within the hierarchy of planning policy should be set out more clearly. A vision for the area would be useful and should be included here.	Noted - planning hierarchy chart can and will be added in this section.
9b	Analysis of land ownership/ long leaseholds would be useful in providing evidence for delivery.	The SPD is a design document and as such describes a vision for the area, technical issues such as land ownership have been considered when forming and describing the vision, but the finer detail forms part of the planning process considerations.
9c	Pg 16. Clarity of status of and aspirations of pedestrian and cycle routes along with access through railways would be useful as this informs potential quantum of development.	High Level Principles are set out to inform development potential, Detail would form of the planning application process.
9d	Pg 19. Cross Boundary development with Southwark should be considered, along with opportunities for linking space. Should include area specific planning documents. Local neighbourhood areas/ forums should be identified and discussed.	The document has been developed in consultation with Southwark. Section 4.3 of the SPD deals with surrounding context in relation to the development of over-arching principles.
9e	Clarity on building height limits would be useful and should be identified using Policy D8 of the new London Plan. Specific locations and associated heights should be identified using policy D8	Response as per point 8
9f	Pg 24. Strategic planning objectives should indicate quantum's i.e. Numbers of affordable homes, jobs and industry etc.	The SPD is a design based document and provides further guidance on Policy SSA3 which in turn sets out the agreed development criteria

Appendix 5: Issues raised from the consultation exercise

	9g Pg. 32 - key objectives are vague and neighbouring developments/ public realm beyond the boundary should be included for consideration in the SPD and to capitalise on opportunities.	Policy SSA3 sets out the objectives. Section 4.3 of the SPD deals with surrounding context in relation to opportunities and over-arching principles for those.
	9h Clarity of heights across the site might be useful - heat map does not currently reflect what is consented in outline.	The consented outline envisaged clusters around a new station and South Bermondsey station with additional marker buildings along the Surrey Canal Road. We feel the heat map broadly aligns with this approach.
	9i The SPD should clearly identify the specific requirements for Stadium access. Clarity of requirements over space and priority eg. For broadcasting would also be useful.	The SPD is a design framework setting the general parameters for design in order to ensure a comprehensive approach to the development of the Surrey Canal Triangle. Specific requirements for access will be established via forthcoming planning applications. The space and possible location for outside broadcasting for the football club are identified.
	9j Mitigation measures eg. SELCHP should be illustrated	To be addressed in the detail of planning applications coming forward.
	9k Character areas should include existing plans and photo's of the sites and opportunities/ 'retain capacity' status due to it's location in within the Central Services Area.	Noted - the level of historical detail provided within the SPD is considered appropriate.
	9l Development phasing should be considered.	Delivery and Phasing is dealt with in section 6.1 in sufficient and appropriate depth at the level of an SPD design document
TFL	1 TFL generally supportive but in order to ensure delivery of the good growth agenda, Lewisham may wish to add greater detail to the SPD to ensure a stronger influence on developments coming forward for the area.	Noted. Lewisham feels that the level of detail provided is appropriate for this SPD. The focus of an SPD is essentially strategic, not a detailed design or technical document.
	2 There are a number of references to the Lewisham Core Strategy 2011. Is it possible that these are now out of date /in the process of being updated to reflect current circumstances and/or need to reflect current aspirations of the Local Plan 2016. Confirmation and clarity would be useful. Similarly to the development policies and site allocations - now 5 years old.	All documentation referred to is in-date. Policy SSA3 in Lewisham's core strategy is the defining overall policy for this SPD. It is noted that the GLA are at the stage where they intend to publish a new London Plan. The SPD will be reviewed and assessed against any new policy that might be considered relevant - and on an ongoing basis.

Appendix 5: Issues raised from the consultation exercise

3	TFL would support the use of a healthy living streets diagram.	Noted - this will be included in the access and movement section.
4	Suggest guidance on Vision Zero in the SPD	Noted - this will be included.
5	The area has a low PTAL currently, improvements to bus services will be required and this will also support the healthy living streets agenda. The previously secured agreements for a new bus interchange for example will need to remain.	Noted, the detail will be considered as development comes forward through the planning process.
6	The SPD must also be dependent on improvements to train frequencies and a new station.	Noted, discussions are taking place and HIF funding for a new station has been secured
7	Any improvement works around the station and surrounding infrastructure are not part of the current HIF fund so the Council should discuss with TFL any additional works and secure funding for these additions.	Agreed. This will form part of detailed follow-up discussions as development comes forward and through the planning process
8	It is recommended that references to policies are updated for those in the new draft of the London Plan.	References to the Mayor's 'intent to publish' will be added where appropriate and in relation to Policy references in the SPD
9	It is important that development is configured to maximise accessibility to both new and existing stations and bus stops within the area of pedestrians and cyclists to include those also with disabilities - and within the SPD area and beyond including Southwark.	Noted. Principles of access, movement and connections are set out and the detail will be considered as development proposals come forward.
10	TFL is supportive of the vision. It would help to incorporate references to the importance of public transport within the area to support forthcoming development and the need to create strong and attractive walking and cycling routes.	Reference to this is made in the access and movement and in the overarching principles sections. The Healthy Living streets diagram has also been added to the former section.
11	An additional potential opportunity for a route exists between Millwall Stadium and LoveLinch Close via the Renewal site.	Noted - this to be investigated and any amendments made.

Appendix 5: Issues raised from the consultation exercise

12	In general the document needs to allow flexibility to maximise local connections and permeability and prioritise pedestrians and cycling. Some figures could be updated to reflect this.	SPD does this in the setting out of its key principles. The Healthy Living Streets diagram will be added to further reinforce.
13	Access and movement chapter should include the Mayor's strategic modal shift target and should be more specific on what constitutes a route.	Agreed. Target to be included and Healthy Living Streets diagramme to be provided here.
14	It would be useful if the section on Public Realm and Spaces commented on ownership and types of activity encouraged or discouraged in these spaces.	Lewisham will assess as detailed proposals come forward and through the planning process long with all statutory bodies concerned.
15	In the Character areas section it would be useful to clarify that cycle parking and entrances should not be hidden from view or other means of securing surveillance. The area is within an opportunity area and should be car-free this should be reflected within the character areas along with approach to parking.	Noted. Detail will be considered as proposals come forward.
16	The Stadium area - it is recommended that principle 5 be amended to ensure public access at all times and details of coach and other parking are set out.	Noted, access to be amended. Coach and other parking arrangements would be dealt with in the detail of proposals coming forward.
17	Principle 3 - the development of a link beneath the East London Line is welcome, further discussion with appropriate stakeholders including TFL is advised.	Agreed
18	Excelsior - the proximity to the new London Overground station should be considered in greater detail, particularly on how the train to bus interchange would work. Given that development coming forward should be car-free, the creation of links between Rollin St and Surrey Canal and the other north-south routes and east-west routes should be signed as 'access and bus only'.	Agreed - to be considered as details emerge on actual proposals, Access comment to be inserted into SPD.
19		Noted

Appendix 5: Issues raised from the consultation exercise

		Timber Wharf - Vehicular access to the plot should be obtained from Rollins St and/or Lovelinch Close - as per above comments re: westward routes.	
	20	Stockholm & Senegal -Stockholm Road will be a pedestrian priority route, only providing access to the plot itself - for vehicles. Cycle routes that are incorporated should be described with greater clarity.	Agreed - although to be considered as details emerge on actual proposals
	21	Bolina Gardens - Facilitating access as shown is welcomed.	Noted
	22	Surrey Canal Road - clear delineation of modes of transport should be designed into the route. Changes in level need to be addressed.	Agreed - although to be considered as details emerge on actual proposals
	23	It is noted that Transport is a requirement for section 106 obligations. However could the requirements be more specific and detailed, clearly prioritising sustainable transport modes. Clarification over 106 and CIL arrangements might be useful along with timings.	The SPD sets out design principles. Details mentioned here are for discussion when actual proposals emerge and as part of planning process.
	24	Infrastructure - could there be a caveat to say the list of requirements is not exhaustive and that there may be additional requirements.	Agreed - text insert to be added
	25	The SPD states that the station will be delivered by TFL using developer contributions etc. - TFL would like to discuss and agree the exact wording for this element and so that it reflects the HIF position.	Agreed - forms part of the detail in the planning process
London Port Authority	1	Given the location of the area in proximity to the River Thames, The Port of London Authority (PLA) has no comments to make.	Noted
Thames Water	1	Consider that the SPD should include a policy relating to water supply and treatment and in the context of considering the whole of the development's needs so as to ensure piecemeal upgrades are not delivered with each phase or that capacity is not impacted elsewhere off-site. A recommended paragraph insert is provided.	Agreed - insert to be added

Appendix 5: Issues raised from the consultation exercise

	2	Flood risk and SUDS could be mentioned to include sewer flooding. Thames Water request an insert that they have provided to ensure developers provide appropriate provisions.	Agreed - insert to be added
	3	Sustainability and water efficiency could be referenced and proposed text to be inserted is provided.	Agreed - insert to be added
	4	Housing Allocations - the scale of development is likely to require upgrades to water and drainage infrastructure. It is recommended that developers and the Local Authority liaise with Thames water at the earliest opportunity.	Noted. Lewisham will advise developers to contact service providers to agree connection and any mitigation details as detailed proposals come forward.
Sport England	1	The document could be more specific on what new facilities will be provided and around meanwhile uses - if they are retained or re-provided elsewhere off site.	Noted and agreed, text to be inserted.
	2	Sport England currently objects however officers have spoken with Sports England and they have indicated that subject to the appropriate wording, they will withdraw their objection. Discussions are progressing well and officers are in the process of agreeing the appropriate text.	
National Grid	1	National Grid identifies underground electricity cable BR1704 66KV CABLE as falling within the development area. From the information provided the cable does not interact with any of the proposed development area.	Noted

Appendix 5: Issues raised from the consultation exercise

		Gas - There are no High pressure apparatus but there may be medium to low gas distribution networks, developers should contact the National Grid for any further information and to discuss development impacts on National Grid infrastructure.	Noted. Lewisham will advise developers to contact service providers to agree connection and any mitigation details as detailed proposals come forward.
CBRE on behalf of Millwall Football Club	1	Millwall Football Clubs over-riding comment is one of support.	Noted
	2	MFC has a long established presence in the area and is strongly supportive of the area's regeneration where this supports the needs of the football club and local community.	Noted
	3	Ask to consider that new and emerging documentation including the extension of the Local Plan should be acknowledged and that previous quantum's for example may no longer apply given the emergence of new documentation. The principle of review should be considered.	Lewisham is aware of the Mayor's intent to publish a new Local Plan. The SPD will be monitored on an ongoing basis to ensure that it is relevant and accounts for new relevant Policy. The Council's core strategy sets out policy for SSA3 which remains unchanged.
	4	MFC would like to place more flexibility on the Lion Centre so that in the future, if this requirement were no longer needed then land could be re-purposed.	The Lion's centre provided valuable community facilities and services to Lewisham and Southwark communities. Any loss would need to be justified in Policy terms.
	5	MFC is supportive of the overall approach to height as illustrated	Noted
	6	MFC seek clarification on height and the type and range of uses that would be possible on the Stadium Land Parcel.	Height constraints and opportunities are identified in the SPD. Detail would need to be considered as part of the planning process and proposals emerge. The site is allocated for mixed-use, Policy SSA3 of the Borough's core strategy document sets out the over-arching requirements.
	7	Reference should be made under the 'Sports Facilities' section that this does not include the MFC stadium but refers solely to Timber Wharf.	Agreed
Southwark	1	LB Southwark supports the strategic planning objectives of the SCT SPD.	Noted

Appendix 5: Issues raised from the consultation exercise

- | | | |
|---|---|--|
| 2 | LB Southwark supports the vision defined in the SPD which shares a boundary with Southwark, in particular opening up and stitching the area back to the wider urban grain and neighbourhoods. | Noted |
| 3 | Suggest that in the Over-arching principles diagram, that the former gas cylinder site and continuation of the linear park are highlighted also. | Noted - diagram to be amended |
| 4 | Encourage effective connections to Southwark's transport network and emerging linear park | Noted, the access and movement section describes these principles at high level. |
| 5 | Supportive of land uses identified and for intensification | Noted |
| 6 | Supportive of approach to height but Please also consider Southwark's locally important views | Noted - SPD to include these |
| 7 | Supports the delivery of a new station but suggest mention of the BLE as a crucial piece of infrastructure which will unlock development potential. | Noted - BLE to be added to the wider strategic context section. |
| 8 | Conclusion - the SPD would form a key part of comprehensive and well considered planning guidance that shapes the Borough's borders, providing certainty and direction. | Agreed |

Historic England

The main concerns are around scale of development and testing heights in respect of views and settings.

Noted. The SPD sets out the opportunities and constraints around these themes. HE will be consulted as detailed proposals emerge and through the planning process.

Web survey - 8 respondents

Question 1 Summary

(Are there any important existing Characteristics that should be incorporated)

- | | | |
|---|---|---|
| 1 | Retain characteristics of being a former Canal. | Noted. The SPD seeks to retain and enhance Surrey Canal Road and enhance cycling /pedestrian links. Plans for a new station also provide opportunities for further enhancement. |
| 2 | Maintain links to docklands heritage. | Locally significant buildings such as Rollins House will be retained. |
| 3 | Access to green space and views across London from BridgeHouse Meadows. | The SPD seeks to secure improvements for BridgeHouse Meadows through developer contributions. Important views are referenced in the SPD and any other views will be assessed as part of the planning application process as proposals come forward. |
| 4 | There is a small Artist's community in the area, to maintain this and provide space for them would be positive. | Within the Character areas; the SPD sets out opportunities for various uses and forms of activity which include those for the creative industries. |

Appendix 5: Issues raised from the consultation exercise

- 5 No, the defining quality of the area is one of neglect.

Noted. The SPD is intended to guide and define development that provides a high quality environment with character and sense of place.

Question 2 Summary (What improvements could be made the area)

- 1 The area needs regenerating.
- 2 There are some important community organisations but facilities and the area generally is run down.
- 3 The walkway from Folkestone Gardens along Surrey Canal Rd to the new development and station needs to be made cleaner and safer, it is a very highly trafficked /unpleasant for cyclists and pedestrians.
- 4 There is a lack of facilities/ shops and amenities such as gyms in the area
- 5 The nearest stations are a long walk away and feel unsafe. Better transport links and improved public realm are needed.
- 6 Surrey Canal Road is dangerous at night - cars speed along it.

Noted. The SPD is intended to guide and define a high quality environment with character and sense of place.

Within the Character areas the SPD sets out opportunities for various uses and forms of activity which include those for community uses.

Noted. The SPD seeks to retain and enhance Surrey Canal Road and enhance cycling /pedestrian links. Plans for a new station also provide opportunities for further enhancement.

Policy SSA3 sets out the requirements for development. The SPD seeks to further encourage mixed use development which includes new public amenity and facilities which will serve the wider area.

Pedestrian and Cycle improvements for existing links and connections are a requirement of the SPD and a new train station at Surrey Canal Road is planned. Detail will be considered through the planning processes development comes forward.

The SPD seeks to make improvements to Pedestrian and Cycle routes along Surrey Canal Road along with introducing new and improved crossing points. Details of traffic management will be considered as development comes forward and through the planning process.

Question 3 Summary (Would you like to make any other comments)

- 1 The quiet way is a fantastic asset and should be incorporated to include safe pedestrian crossings along it.
- 2 The planning guidance looks great but do not leave it another 10 years.

As detailed development plans come forward, the Council and other statutory bodies will consider the detail of access and movement. The key principles are set out in the SPD and include the quiet way.

One of the purposes of the SPD is to set out expectations and provide all (including developers and land owners), with the confidence and assurance necessary, to know what is expected. This will help speed up the regeneration of the area.

Appendix 5: Issues raised from the consultation exercise

- 3 The housing crisis is happening now, do not leave this any longer to be tied up in speculation or planning.
- 4 Existing safety concerns along Grinstead Road (boarders Deptford Park) Inwen Court who would like to see a 7 foot barrier constructed with CCTV surveillance and mid-height lighting.
- 5 Concern from existing creative community around current facilities and threat of CPO's.
- 6 Concern over retention of Rollins House and context.

As per point two in question three above.

Noted. Existing concerns around safety will be passed on to the relevant agents. This does fall outside of the immediate SPD area however it would be inappropriate for the Council to construct anything that causes severance of communities.

Noted, the Council will work to ensure concerns are addressed or mitigated through the detail of the planning process.

The SPD states that Rollins House will be retained. Context will be assessed as detailed development plans come forward as part of the planning process.

Drop in session - 5 visitors

Comments on amenity and transport and general /overall development plans

- 1 All very supportive of a new station - and as soon as possible
- 2 Keen for there to be swimming facilities
- 3 There are some points along Surrey Canal Road around the potential station area on the opposite side, where cycling can be hazardous due to blind spots, this should be considered.
- 4 Match day traffic needs to be well planned.
- 5 Plans look great to start with - very optimistic
- 6 Phasing, station should come first, along with improved public transport generally and bus routes for example.
- 7 Concern over how SELCHP waste would be dealt with.

Noted. The HIFF funding defines the timescales for this. The station is an important proposition in the SPD and to a degree; development is dependent on the station coming forward.

Policy SSA3 in the core strategy defines the requirements which have been consulted upon and agreed , the Council will work to secure these requirements and any additional benefits for the community.

Noted. Principles of access and movement are set out in the SPD. Detail will be considered as development comes forward in the planning process.

High level key principles around access and movement are set out in the SPD, the detail will be considered as part of the planning process as development is proposed.

Noted. The intention of the SPD is to set the standards and expectations for development so that key principles and good quality design are carried through.

The HIF funding defines timescales for the station however this would mean that the station will come forward very early on in development. The planning process would seek to secure improvements and additions to other forms of public transport as development proposals are submitted.

Noted. This will be dealt with in the detail of any planning application submissions

Appendix 5: Issues raised from the consultation exercise

8	Please incorporate bike storage at the station.	Noted. The Council will work to ensure this provision is incorporated in the detail of proposals for a new station as a planning application.
9	Lighting along routes to stations should be considered.	Noted. Principles of safe and 'liveable' streets are now covered in the SPD. Details will be considered in any planning application coming forward. (Healthy Living streets).
Other Contextual comments		
10	Old and new could look a bit odd, could there be any improvements to the Windslade Estate housing and the general area /public realm?	The SPD seeks to identify opportunities for enhancing the character and amenity of the local area. Contributions will be required by developers to support local area improvements.
11	The banking of Surrey Canal Road and the entrance/ exit and sides to the station are important characteristics of the area.	Noted. As part of the approach, the SPD seeks to promote and enhance local character and distinctiveness. Details will be considered in the planning process.
12	There are currently no shops or amenity nearby.	The SPD seeks to encourage mixed use development which includes new public amenity and facilities which will serve the wider area. (Land uses diagram and set out in Policy SSA3)
13	The arches could be enhanced with activity.	Noted. The SPD defines key routes, in the access and movement sections, these will be required to conform to the principles of healthy living streets, this includes active street frontages. A diagram setting these principles out will be inserted into the SPD
14	There is some illegal dumping.	Noted, the healthy living streets principles will be incorporated into the SPD and CCTV will be introduced where appropriate in the detailed design stages of any proposals coming forward.
Comments on Height		
15	How tall will the development be - it seems very tall.	The SPD highlights the constraints and opportunities around height and massing, it is not appropriate for Lewisham to dictate exact parameters, but exact detail around height and massing will be considered as development proposals come forward and through the planning process
Comments on ownership		
16	Concern over potential CPO's from existing businesses	The Council will work with existing land owners and businesses to ensure that their needs and requirements are considered within the development process