

Lewisham Town Centre Area Action Plan

Further Options Report

January 2011

Copy for Mayor and Cabinet



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1. INTRODUCTION

1.1 Background and process

1.1.1 What is the Lewisham AAP?

Lewisham's emerging Core Strategy Development Plan Document (DPD) sets out a spatial strategy for the whole of the Borough. Spatial Policy 2 identifies Lewisham Town centre as Regeneration and Growth Area and the Lewisham Gateway Site as one of five Strategic Sites that are considered to be central to the achievement of the Strategy. It also aims to ensure that by 2026 the town centre achieves Metropolitan status, accommodates up to 40,000sqm of additional retail space, improved leisure space and 2,500 additional homes.

The Lewisham Town Centre Area Action Plan (AAP) will be one of four further proposed DPDs that will set out new local planning policies, supplemented by guidance in the form of Supplementary Planning Documents. These documents will supersede the UDP, including 'saved' policies and allocations specific to Lewisham Town Centre in the UDP and adopted guidance, including the Lewisham Gateway Planning Brief (adopted as Supplementary Planning Guidance in 2002).

The Mayor of London's Spatial Development Strategy (the London Plan), with which all DPDs need to be in 'general conformity', sets out London-wide policies, supported by Supplementary Planning Guidance.

The AAP, together with other adopted DPDs and the published London Plan, will form the 'development plan'. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 makes clear that determination of planning applications must be made in accordance with the development plan unless material considerations indicate otherwise.

The proposed policy framework is summarised below. Whilst the Core Strategy sets out a strategy for the next 15 years up to 2026, the AAP will focus on the shorter timescale of 5-10 years (the 'plan period').

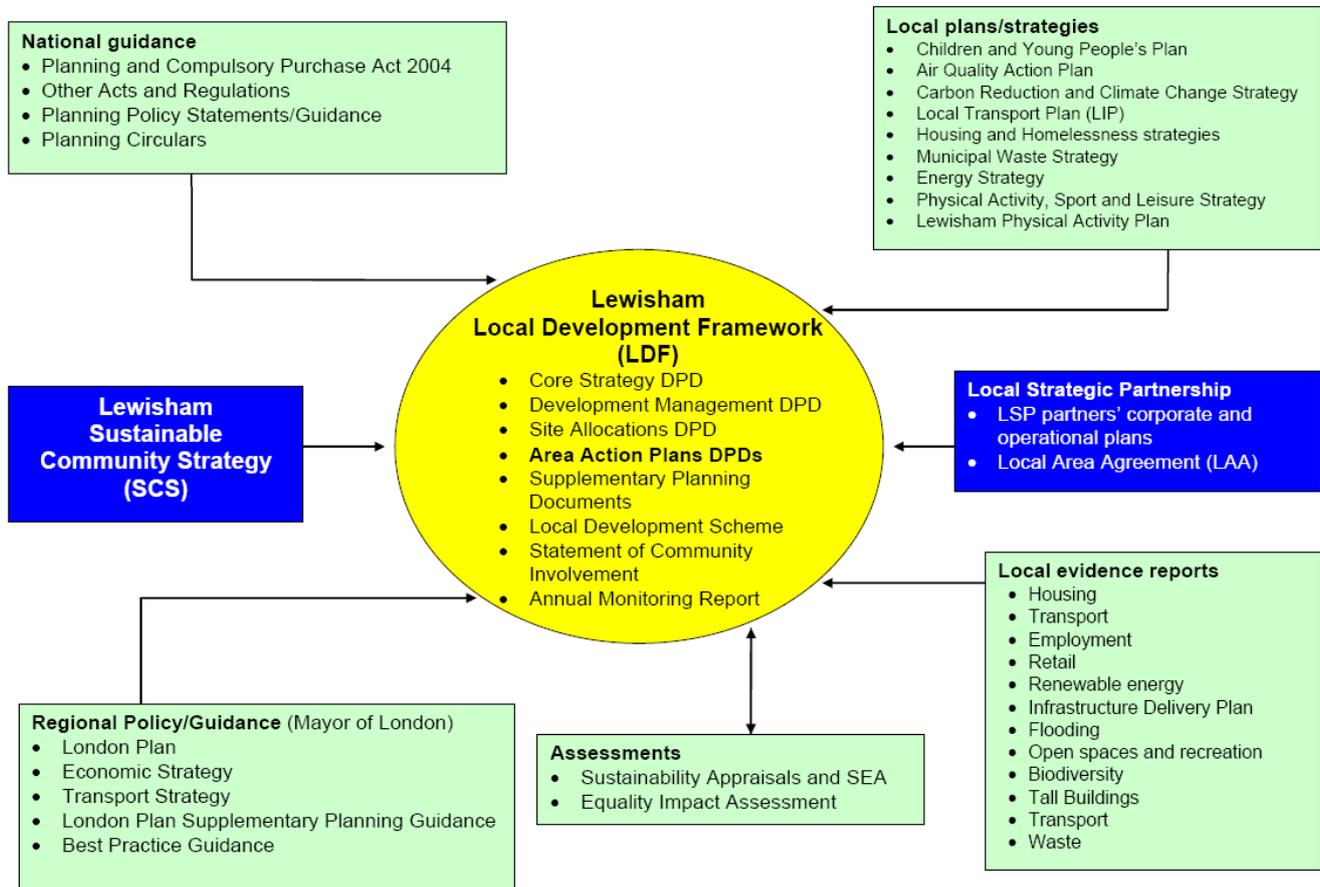


Figure 1: The position of the AAP within the policy framework

1.1.2 What is the purpose of this document and the AAP?

The overall purpose of the AAP is to deliver the vision and strategic objectives identified for the town centre by managing development and guiding interventions by the private, public and third sectors. The following diagram summarises the process of preparing the AAP.

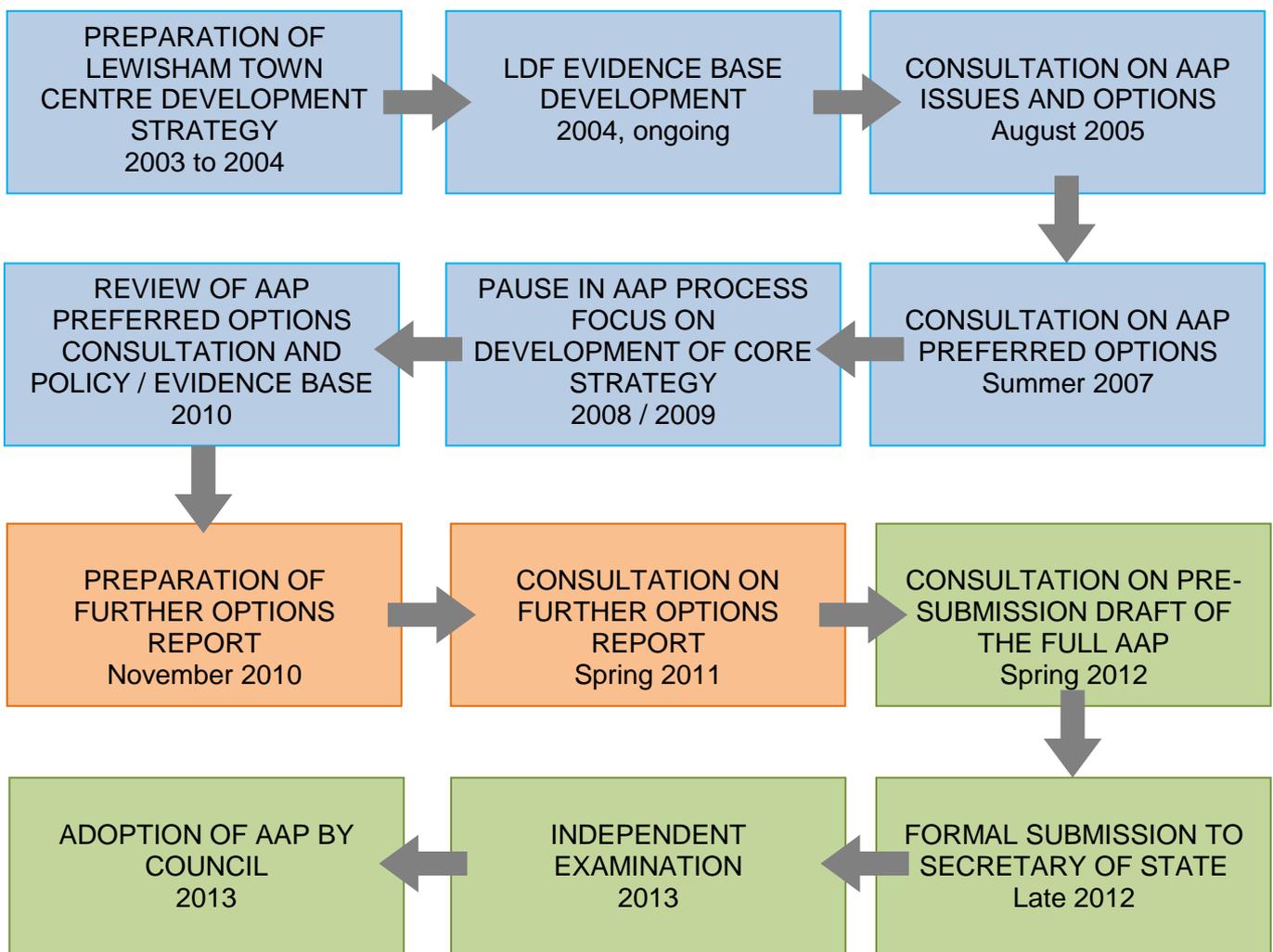


Figure 2: Where we are in the process

This document bridges the gap between the Preferred Options Report which was subject to public consultation in 2007, and the pre-submission draft of the full AAP which is targeted for publication in spring 2012. The following table summarises the scope and purpose of the Further Options Report and the final AAP.

Further Options Report	The AAP
To re-engage with local residents, businesses and other stakeholders over the future of the area	To set out a vision for the Town Centre that is consistent with Spatial Policy 2 in the Core Strategy.
To take account of comments received in response to the Preferred Options consultation	To provide a focused implementation and delivery plan for achieving this vision and for monitoring progress.

<p>To respond to changes in circumstances (legislation, policy, guidance, development activity, recession etc.)</p> <p>To provide a bridge between the Preferred Options Report and an AAP</p>	<p>To effectively manage growth in retail, leisure, employment uses and new homes,</p> <p>To ensure that physical, social and green infrastructure provision keeps pace with the envisaged change.</p> <p>To provide clear policies and guidance for land owners and prospective developers, so that they bring forward high quality development.</p>
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Figure 3: Scope of Further Options Report in comparison to AAP

The preparation of the AAP is being informed by an iterative process of Sustainability Appraisal to assess the emerging proposals from a sustainability perspective. This process is established in the Sustainability Scoping Report which was updated in October 2010 to ensure that the sustainability framework is based on an accurate understanding of key issues and policy objectives. The process is also being informed by an Equalities Impact Assessment, which considers the likely effect proposed policies would have on different groups in the community.

1.2 From Preferred Options to AAP

1.2.1 Key areas of feedback from consultation

The following points highlight the principal feedback on the preferred options consultation which took place in June 2007.

- Comments on the scope of the AAP and overlap with other documents in the LDF including the Core Strategy. For example, the lack of a specific policy position on affordable housing within the LTC AAP.
- There is potential to include a Lewisham town centre specific flooding policy.
- Clarification is required in relation to the delivery and implementation of the key sites, many of which are coming forward as schemes, or benefit (in part at least) from planning consents.
- Objections to what is perceived as a relaxed approach to employment land and Metropolitan Open Land.

- Opportunities for decentralised energy networks and de-centralised power need to be investigated further as the AAP progresses.
- Sites policies are considered to be over-prescriptive by some consultees. In addition, there was an objection in relation to the use of the term 'Opportunity Area' which is already established in policy terms at the sub-regional scale.
- Requests to review the approach to Conington Road, Engate Street and the Lewisham Centre.
- Update references to Lewisham Gateway scheme which now has consent.
- Greater detail sought in relation to the approach to developer contributions in Lewisham which is now set out in the Planning Obligations SPD. Specific requirements on a site by site basis will be set out in the AAP.
- Need to strengthen the approach to the evening economy.
- A number of specific and detailed objections or statements of aspiration in relation to the Lewisham Gateway scheme.

A full schedule of consultation responses and associated resulting actions can be found in Appendix 2.

1.2.2 Principal policy changes

The following aspects of the planning policy framework have altered since the publication of the Preferred Options document in 2007:

Legislation:

The Planning Act 2008 introduced a number of alterations to the planning system including a new Community Infrastructure Levy. The CIL Regulations 2010 set out a new tariff for raising funds from developers to help deliver infrastructure (but not affordable housing) that the Council could use which would scale back the use of planning obligations.

National planning policy guidance and designations:

Planning Policy Statement 4 (PPS4) - Sets out the Government's comprehensive policy framework for planning for sustainable economic development. This replaced PPG4, PPG5 and PPS6.

Planning Policy Statement 5 (PPS5) – PPS5 and associated guidance sets out new advice on how the historic environment and heritage assets should be protected and enhanced for the current and future generations. This replaced PPG15 and PPG16.

Planning Policy Statement 12 (PPS12) – PPS12 was updated in 2008 and sets out the Government's policy on the preparation of LDFs.

Planning Policy Statement 25 (PPS25) – PPS25 sets out Government policy on development and flood risk and identifies the need for a proactive approach to the management and mitigation against the risk of flooding and adoption of a robust approach to avoiding inappropriate development in high risk areas. The advice was revised in 2010.

Lewisham Bridge Primary School has been added to the statutory list of buildings (Grade II) that are of architectural and/or historic interest.

Spatial Development Strategy:

The London Plan (consolidated with alterations since 2004) was re-published in February 2008. The London Plan identifies Lewisham Town Centre as part of the Lewisham-Catford-New Cross Opportunity Area which is earmarked as having potential for intensification, regeneration and redevelopment in the context of good public transport accessibility. Mayor of London, has reviewed the London Plan and a replacement Plan is due to be published in late 2011. The draft consultation version of the replacement plan retained the Opportunity Area.

Lewisham Local Development Framework:

Following significant strengthening of the local evidence base, the London Borough of Lewisham submitted its Core Strategy to the Secretary of State for formal examination in October 2010. The Council also published its Site Allocations Further Options Report in October 2010 for public consultation, which ran to 6 December 2011. This recommends that the former Watergate School site in Church Grove be allocated for a Gypsies and Travellers site to encompass five pitches and that Lewisham Bridge Primary school be allocated for redevelopment to cater for both primary and secondary education levels (an all-through school).

Wider policy context:

The Local Strategic Partnership published an updated Sustainable Community Strategy (Shaping Our Future) in 2008. In 2009, an updated set of improvement indicators and targets was published for Lewisham's Local Area Agreement, 'Opportunity and well-being for all'. It should be noted that the Coalition Government has recently abolished Local Area Agreements and associated indicators, effective from the end of the 2010-2011 monitoring period. In response

the Council is currently reviewing the situation to ensure it maintains a suite of appropriate and local indicators within a monitoring framework for future years.

The government's aspiration to create zero carbon new buildings started with the 'Building a Greener Future' document in 2007. This document contained a proposed timeline of incremental policy amendments, to be implemented via Part L of the Building Regulations, culminating in the requirement for all new homes submitted to Building Regulations approval after 2016 to be 'zero carbon'. The sustainability policy context continues to evolve and there is an increasing realisation that decentralised energy is a suitable policy option for urban areas.

In line with guidance associated with the preparation of plans, the Council is placing greater emphasis on delivery and implementation to ensure that LDF documents are sound, and capable of realising the spatial policy objectives.

1.2.3 Character areas and key sites

The Preferred Options report (2007) identified a number of key opportunity sites within Lewisham Town Centre. Some of these sites have since progressed to implementation, some remain key development opportunities whilst some new sites have emerged as tangible development opportunities. The individual sites (sometimes themselves a collection of sites in different ownership) fall within a number of character areas as follows:

Gateway Character Area

This character area is dominated by the northern roundabout, roads and open and cleared spaces that make up the Lewisham Gateway site. This site is identified in the Council's emerging Core Strategy as one of five strategic sites across the Borough under Spatial Policy 2 and Strategic Site Allocation 6.

Loampit Vale Character Area

- **Loampit Vale South** – comprising the new Lewisham Leisure Centre and related mixed use development (under construction) and the proposed Prendergast Vale College through school. The Site Allocations Further Options Report (October 2010) recommends that the Lewisham Bridge Primary School site be safeguarded for the proposed through school.
- **Loampit Vale North** – comprising the land bound by the two converging railway lines to the north, west and east and Loampit Vale to the south. Planning permission has been granted for the redevelopment of the Thurston Industrial Estate. The area also includes the MFI and Allied

Carpets sites, the land identified for a bus layover as part of the Lewisham Gateway proposal and other buildings.

Conington Road Character Area

- **Tesco site** – comprising the existing store, its petrol filling station and its associated surface car parks.
- **Venson site** – to the north of the Tesco store and benefitting from planning permission for redevelopment for new housing and some commercial development.

The Silk Mills Path site to the north-west of Tesco has been developed for new housing with some ground floor commercial space and will therefore no longer be identified as an opportunity site within this character area.

Lee High Road Character Area

- **Former Hartwell Ford site** – planning permission has been granted for mixed use development on this site comprising a new retail store on the ground floor together with flats above. This scheme is currently under construction.
- **Other Lee High Road sites** – a series of other smaller sites nearer the town centre have planning permissions and are being promoted by a number of investors.

Ladywell Road Character Area

- **Ladywell Leisure Centre site** – this site will become available in 2013 following the opening of the new Lewisham Leisure Centre on Loampit Vale. The site presents a major new development opportunity not explicitly identified in the Preferred Options report (2007). A number of development options are being considered as the AAP is prepared.
- **Ladywell Road** – a collection of sites on the south side of Ladywell Road present a major opportunity to combine new infill development and investment with the refurbishment of listed buildings and other heritage assets.

Central Character Area

- **Lewisham Shopping Centre and adjacent land** – unlikely to come forward for comprehensive redevelopment in the foreseeable future but opportunities exist for retail led mixed use development at the northern and southern ends of the centre.

There are a number of places within the core of the town centre which may present opportunities for redevelopment and/or environmental enhancements. These include the existing Lewisham Library, the town centre's key surface car parks and the street market and surrounding public space.

1.2.4 Economic climate

There have been significant changes in the UK property market in recent years, largely in response to the impact of the "credit crunch" and recent period of recession. Public spending, as set out in the Government's Public Sector Spending Review (October 2010), is also going to be severely constrained within the next 5-10 years. It is important that the AAP policies are reviewed to ensure that they remain robust and credible in the context of the current property market and public sector spending regime.

1.2.5 Evidence base

The council have undertaken a number of new and updated evidence base studies since 2007 in support of the wider local development framework process. The following summary of strengths, weaknesses and opportunities draws on a number of these evidence base documents to provide a summary of the key results. The studies include Lewisham Employment Land Study January 2009, Lewisham Housing Market Assessment February 2010, Lewisham Retail Capacity Study 2004, Lewisham Retail Capacity Study 2009, Lewisham Strategic Housing Market Assessment, South East London Strategic Housing Market Assessment 2009, London Strategic Housing Land Availability Assessment, and Housing Capacity Study October 2009.

Strengths

- Lewisham is the largest and most important retail centre in the Borough and provides the main opportunity to improve comparison goods shopping.
- The Lewisham Shopping Centre has a very strong occupational market with good demand by retailers for space. This is the key focus of retail activity in the town.

- Overall Lewisham has a relatively low retail vacancy rate which implies that the local retail market is strong.
- There is much residential development being planned or about to be constructed in Lewisham. Much of this residential space is due to come onto the market in 2011/2012.
- Although residential property prices have fallen since the credit crisis, they have since re-bounded. Lewisham is a popular location for young professionals to live hence the large number of 1 and 2 bedroom apartments. Lewisham also has a strong private-rent market which has remained so over the last 2 years despite weaknesses in other markets.

Weaknesses

- Lewisham has a high proportion of residents who are classified as unemployed, requiring benefit or are vulnerable being either homeless or older persons with health problems
- There are a high number of residents employed locally in Public Sector institutions. Although this area of employment was once secure, this position has changed and it is likely that employment cuts will be made throughout the Public Sector during 2010-2011 and for several subsequent years.
- The layout of Lewisham's busy roads which circulate the shopping centre, inhibit access to it by both foot and car.
- Retail development in the UK has slowed since 2007 with a number of planned schemes being shelved. This uncertainty will not help Lewisham's aspirations for development of retail floorspace.
- Although the Lewisham Shopping Centre is reportedly trading well, retailers located on secondary and tertiary streets may find trading hard in the present financial climate. There is a risk that some retail units on the outskirts of Lewisham Town Centre with low levels of foot flow, may become vacant.
- Some of the retail units located inside the Lewisham shopping centre are too small to satisfy modern retailers requirements.
- There are only a small number of leisure facilities in Lewisham therefore residents tend to travel out of Lewisham for facilities such as the cinema. There are plans for leisure development but these have yet to come to fruition.
- Lewisham has no critical mass of existing office space and a number of factors mean that it is unlikely that further large occupiers will be attracted to the town in the short to medium term.
- There is an over supply of 1 and 2 bedroom apartments in Lewisham which has created an imbalance between this type of housing and family housing.

Demand for family housing is relatively strong but supply is poor.

- The buy to let market has faltered somewhat since 2008 due to the difficulties for investors to raise finance.

Opportunities

- The population of Lewisham grew by 3% between 2001 and 2008. It is forecast to increase by almost a quarter (64,300) between 2006 and 2031 which will benefit the property market's ability to grow and for development of retail, office and residential space.
- There are a high proportion of individuals in Lewisham categorised as educated young professionals who work in Central London and who have relatively high levels of disposable income.
- There is demand from a number of major retailers located in Lewisham Town Centre for larger amounts of retail space. Due to the lack of supply and the high demand for space in the shopping centre, rents have remained constant from 2008 levels. There is also significant forecast retail capacity.
- The Lewisham Gateway development scheme is a major opportunity for Lewisham which will assist in bringing the town closer to its Metropolitan status and which, as well as providing new retail, and residential space will also address some of the issues associated with the existing road layout.
- There is a requirement over the next five years for 12,685 social rented homes in Lewisham Borough. The delivery of affordable housing in Lewisham is a key target for the Council and it is important that this is carefully managed so that development remains viable.

1.2.6 Town centre focus

The Preferred Options report (2007) identified a detailed range of draft policies which reflected the comprehensive coverage the issues, options and preferred options identified by the AAP process.

Following revised Government guidance and more detailed work on other Local Development Documents, including the Core Strategy, there has been an acknowledgement that the AAP should be more focused on addressing specific town centre issues. As such, the Further Options Report has a reduced number of draft policies to ensure that the AAP has an appropriate scope and focuses on town centre specific issues only.

The reduced scope does not mean that topics that have been left out are no longer

important. It means that these topics are or will be adequately addressed in other parts of the 'development plan'.

1.2.7 Scope of document

Taking account of comments received in relation to the Preferred Options Report and the changes in circumstances that are set out above, the remainder of this document sets out the proposed changes in approach to preparing the AAP. In doing so it:

- a. Proposes an amended vision and amended objectives
- b. Identifies revised and additional issues and options taking account of:
 - Advances in the understanding of flood risk and climate change adaptation including the policy requirement to maximise decentralised energy
 - The future of Ladywell Leisure Centre
 - The provision of social infrastructure
 - Implementation and monitoring
- c. Sets out a new, smaller number of town centre-wide spatial policies
- d. Identifies amended sub-areas (now called Character Areas), with Engate Street longer being identified as a sub-area and Ladywell Road being identified as a new sub-area.
- e. Proposes revised policies for each of the sub-areas
- f. Proposes new implementation and monitoring arrangements
- g. A detailed review of how identified issues and options and proposed objectives and policies have changed since the April 2007 Preferred Options stage is set out in Appendix 3.

1.3 How can you comment?

The Council would like you to get involved with the production of the Lewisham Town Centre AAP by telling us what you think about the options and preferred options contained in this Further Options consultation report. All comments received, alongside feedback that has already been given on the earlier versions, will be considered in the development of a draft AAP.

Key questions we are asking are:

1. Are there any additional issues needing consideration by the AAP?
2. Do you have any comments on the recommended or alternative options put forward?
3. Do you support the recommended options for inclusion in the AAP?
4. Are there any other alternative feasible policy options?
5. Do you think that details included are incorrect or need updating?
6. Do you have any other comments on this document?
7. Do you have any comments on the accompanying Sustainability Appraisal?

How do I get involved?

Web

Ideally we would like you to provide your comments on-line against the relevant sections of this document at the following address

<http://consult.lewisham.gov.uk/portal>

OR

E-mail

planning@lewisham.gov.uk

with 'LDF AAP Further Options Report' as the subject.

OR

Post

Planning Policy
London Borough of Lewisham
5th Floor, Laurence House
1 Catford Road
Catford, SE6 4SW

If you would like to speak to the Planning Policy Team about this report, please telephone us on 020 8314 7400.

Please send comments by: 5pm on (To be confirmed).

It may not be possible to take account of comments that are received after this date.

2. THE STRATEGY

2.1 Geographical context

The London Borough of Lewisham covers around 13.4 square miles, located in south east London. It is a vibrant and ethnically diverse borough, home to more than 260,000 people.

The borough is made up of a collection of diverse neighbourhoods and strong communities ensuring that while the borough and its localities develop, they maintain their unique identities and preserve Lewisham's rich natural and architectural heritage. Adjoined by four other London boroughs, Lewisham occupies a key position on important transport routes (radial and orbital) within London and between central London, Kent and Sussex.

Strategically, the north of the borough forms part of the Thames Gateway, a nationally recognised growth area stretching east to the Kent and Essex coasts along the Thames Estuary. Lewisham, Catford, New Cross and Deptford are identified as opportunity areas in the London Plan and are expected to be able to accommodate substantial new jobs and or homes.

Lewisham Town Centre is especially well connected to central London by rail and the DLR and benefits from high PTAL of 6b and 6a. It has developed as an important dynamic and strategic retail and service hub and is designated as a Major Centre within the London Plan. Lewisham offers a variety of appeal including the historic street market, comparison goods retail in the Riverdale Shopping Centre and independent specialist retail along the Lee High Road. Employment in the town centre is largely split between Distribution, Hotels and Restaurants (largely retail) providing 30% of total jobs, Banking, Finance and Insurance providing 27% and Public Sector (administration, education and health) accounting for 26%.

The Indices of Multiple Deprivation show that the area covering Lewisham town centre is among the 20% most deprived areas within England. While educational and health factors demonstrate a mid-table ranking, the indices relating to crime, environment and those affecting children and old people remain in the bottom quintile.

The borough is the 15th most ethnically diverse local authority in England where 130 different languages are spoken. This diversity is apparent in the town centre with the proportion of the overall population from a black and/or minority ethnic

origin at 47%.

The town centre has 3 primary schools within and close to its boundary including Lewisham Bridge Primary School, which is currently being transformed into the Prendergast vale all-through school, and a total of 23 primary schools in the two Primary Places Planning Localities (PPPLs) that cover the town centre. There are also 2 secondary schools nearby which have benefitted from the Building Schools for the Future (BSF) Programme to rebuild or refurbish every secondary school in the borough within the next decade. Health facilities are provided by 6 GP's and 4 dentists close by and the Lewisham University Hospital located immediately south of the centre providing acute services and a children's centre. In supporting the area Lewisham has a number of community and leisure facilities, while there are also many independent faith group facilities.

The borough has a wide portfolio of parks and green spaces, whilst within the town centre open space is provided through a mix of green and hard landscaping. Additionally, there is a Site of Importance to Nature Conservation and a number of green corridors that permeate the outskirts of the centre. The River Ravensbourne and the River Quaggy flow north and west respectively through the town centre surrounds converging adjacent to the railway station and continuing north towards the River Thames. The paths of both rivers are affected at points by culverts and channeling, while other sections accompany open space (including the Waterlink Way). In September 2010 the Council completed a final draft of the River Ravensbourne Corridor Improvement Plan which seeks to support opportunities to enhance the river and provide specific and general design guidance. Large parts of the town centre are at some risk of flooding from these sources although importantly most of the area is protected by flood defences, including the Thames Barrier.

A number of key historical assets exist in Lewisham, including listed and locally listed buildings (some of which are considered to be at risk) and local landmarks as well as the historic street market. The centre also falls within a wider Area of Archaeological Priority.

2.2 Key issues

2.2.1 Economy

Retail growth: Lewisham Town Centre has a relatively poor level of retail growth. In the context of predicted population growth there is a need to enhance the vitality of Lewisham town centre, to improve the local economy and reduce the need to

travel outside the borough for goods and services. There is also a major opportunity to enhance the quality of the street market which is constrained by issues associated with refuse which has a negative impact on the overall street environment in Lewisham High Street.

Employment and training: It is important that the AAP ensures a good range of job opportunities and supports business enterprise. Sufficient employment land will need to be protected and new sites identified for mixed use development - including employment generating floorspace - to improve the overall economy of the town centre and the borough. Employment prospects should be enhanced by supporting and improving local training opportunities.

Evening economy offer: Lewisham Town Centre currently lacks a strong evening economy offer. Opportunities to nurture the range and quality of bars and restaurants should be grasped with a view to enhancing the vitality of the town centre beyond peak shopping hours, whilst strengthening the centre as an inclusive family friendly place.

2.2.2 Environment

Protection and enhancement of biodiversity and habitats: Brownfield sites are important habitat for local species. Species such as the stag beetle, house sparrow and black redstart are local to this area but numbers have suffered marked declines. The naturalisation of Lewisham's rivers offers the potential to reduce flood risk, boost local biodiversity and improve river water quality through biological filtration.

Flood risk: The Rivers Quaggy and Ravensbourne run through the heart of the AAP area increasing the risk of flooding as outlined in the Strategic Flood Risk Assessment. Climate change is predicted to increase adverse weather patterns, leading to more intense and severe flooding in flood risk areas and as such there is a need to reduce flooding and manage risk.

CO2 Emissions and Climate Change Adaptation: Climatic change due to greenhouse gas emissions from fossil fuel use is likely to affect the natural environment. The built environment will need to adapt to these changes and find ways of reducing carbon emissions, including developing viable decentralised renewable energy networks to supply energy to new and existing developments and the provision of on-site renewable energy technologies. Sustainable design and construction will also be needed to reduce the heat island effect and provide landscaping, public realm and buildings that are better suited to the changing climate.

Traffic congestion and car dependence: A growing population will increase movement, placing pressure on the road network and existing public transport. There is a need to locate development near existing transport links and improve walking and cycling routes and public transport; and adopt a managed and restrained approach to car parking.

High levels of air pollution due to traffic: Lewisham is exceeding pollution levels for road transport as set out in the Lewisham Air Quality Action Plan. With predicted population growth there is a current and future need to increase the use of sustainable modes of transport and reduce carbon emissions.

Aging building stock and poor levels of insulation: The existing building stock will require updating with improvements in energy efficiency and increases in building Standard Assessment Procedure ratings.

Carbon Dioxide emissions reductions: Lewisham's Energy policy requires a reduction in a buildings overall Carbon Dioxide (CO₂) emissions by maximising efficiency gains through each stage of the Mayor of London's energy hierarchy.

Recycling and waste production: There is a need to reduce waste generation and improve the existing low level of recycling and composting rates.

Inclusive Design: There is the continuing need to ensure that new inclusive design principles inform the design of new buildings, public realm areas and facilities to ensure that the town centre is accessible to everyone.

2.2.3 Social

Housing demand and population growth: The population is forecasted to rise. The Core Strategy sets a target of 1,500 additional new homes by 2016 and a further 1,100 additional new homes by 2026 in Lewisham town centre. The average income of the majority of households is insufficient to buy a house. There is an issue with access to affordable housing in Lewisham, highlighted by Lewisham Housing Commission.

Decent and accessible homes: The percentage of homes that do not meet decent homes standards is falling, however there is still a need to improve this. There is also the continuing need to ensure that new residential development provides homes that meet Lifetime Homes Standards and, where car parking can be provided, includes at least 10% of homes that are wheelchair accessible or easily adaptable to be so.

Improved access to health care, education and community facilities: Ensure that improved and accessible health, education and community facilities are provided to accommodate existing needs and those arising from new developments. There are a number of unauthorised churches in the town centre that exhibit a demand for such accommodation.

Low levels of educational attainment: There is a need to improve the educational attainment of students in primary and secondary schools as previous years. Although improving, Lewisham is ranked in the worst third of Local Authorities for National Indicator 75 (Achievement of 5 or more A*-C grades at GCSE or equivalent English and Maths).

Addressing deprivation, social exclusion and health inequalities: The Indices of Multiple Deprivation show that the area covering Lewisham town centre is among the 20% most deprived areas within England. While educational and health factors demonstrate a mid-table ranking, the indices relating to crime, environment and those affecting children and old people remain in the bottom quintile. In Lewisham Central residents have reported higher levels of limiting long term illness and lower than average food health levels. There is a strong link between deprivation levels and health inequality, with residents in deprived areas suffering disproportionately high levels of health problems.

General perception of high crime rates in Lewisham: Though Lewisham has relatively low levels of crime compared to other inner London boroughs, the perception of crime is high. There is a need to provide a safe and well designed urban environment with adequate natural surveillance. Lewisham town centre is vulnerable to crime due to the high volume of people using it, therefore creating a safe environment and improving the perception of crime in the area is essential in achieving the objective to improve the retail performance of the centre.

Provision of open space and recreational facilities: Additional housing will result in a lower proportion of open space per 1000 population. Opportunities to provide additional open spaces from potential developments must be maximised and the role of the public realm enhanced to provide amenity space, better walking and cycling environments and play and recreation opportunities. Previous community consultation suggests that access to open and green space is a key issue for local residents.

Noise: Road traffic and road works noise are the most problematic types of noise for Lewisham residents. Lewisham town centre hosts key busy radial and orbital roads.

Road safety: The results of stakeholder consultations have identified problems with pedestrian safety, particularly in the High Street, where there are problems with conflict between traffic, buses and pedestrians. The number of road accidents although reducing could still be improved.

Protect and enhance local heritage assets: Lewisham has two Grade I listed buildings, a number of Grade II buildings and many locally listed buildings and four conservation areas in or around the town centre, St. Stephen's, Belmont, Mercia Grove and St. Mary's. The borough has its own architectural identity and character which should be preserved or enhanced, and incorporated into development proposals.

2.3 Vision

Lewisham Strategic Partnership, of which Lewisham Council is a part, has adopted the following vision for the Borough, as set out in the Sustainable Community Strategy (SCS) 2008-2020 called Shaping our Future:

“Together we will make Lewisham the best place in London to live, work and learn.”

The Core Strategy takes forward the SCS vision by setting out a detailed spatial vision for the whole Borough. In terms of Lewisham Town Centre, it sets out the following:

“Lewisham Town Centre will have been transformed into a shopping and leisure destination of exceptional quality, offering a strong focus for community identity and cohesion. The centre will benefit from the Lewisham Gateway site delivering easier and better pedestrian routes between the bus and train stations and the high street, a new road layout and new commercial, retail and residential development. New high quality residential developments will help to increase the number and diversity of people using the centre and support its Metropolitan Town Centre status. The street market will continue to provide an extensive range of goods and its overall contribution to the quality of the urban environment will be improved. The Quaggy and Ravensbourne Rivers will be celebrated by the provision of a network of public green spaces and parks including Cornmill Gardens. A new landscaped public plaza where these two rivers meet will consolidate the identity of Lewisham as a river valley town and provide an enhanced sense of place and focus.

The vision is proposed for amendment by adding the following:

“Buildings, streets and spaces will be designed and managed to take account of climate change and incorporate on-site clean and renewable energy technologies, including a decentralised energy network.”

2.4 Objectives

Objective 1 - Retail and town centre status: To support and improve the vitality and viability of Lewisham town centre by enhancing distinctive features such as the street market and achieving Metropolitan Centre status by 2026 through the delivery of 40,000 sqm of additional retail floor space and improved leisure floorspace

Objective 2 - Housing: To deliver up to 2,300 additional new homes by 2016 and a further 800 additional new homes by 2021 to create a sustainable and mixed community of private and affordable housing in line with the Core Strategy with highest densities focused in locations with the highest level of accessibility.

Objective 3: Sustainable Design: To apply consistently high standards of sustainable urban design and construction to individual sites to ensure that developments make the best use of natural resources, enable people to easily make environmentally aware choices and are carefully phased and co-ordinated to create a cohesive place and a sustainable community.

Objective 4 – Employment and training: To maximise job opportunities by retaining/re-providing employment generating uses, the redevelopment of key sites throughout the centre for a range of non-residential uses, including offices and the enhancement of training opportunities.

Objective 5 - Open space/recreation: To encourage healthy lifestyles through the maintenance, protection and improvement of the supply of publicly accessible open space (including public realm and the town centre streetscape), and incorporation of additional recreational and open space as part of new developments.

Objective 6 - Transport: To encourage patterns of development which support walking, cycling and the use of public transport, reduces the need for private car travel, maintains and where possible improves the high levels of public transport accessibility of the town centre and knits the centre in with the surrounding area.

Objective 7 - Environment: To 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 by focusing on protecting the area against extreme weather conditions, mitigating heat island effects and delivering energy efficient and low carbon development.

Objective 8 - Community: To create a place that enables and promotes the adoption of healthy lifestyles and delivers appropriate levels of educational, community and leisure facilities that keep pace with proposed growth.

Objective 9 - Implementing and monitoring the AAP: To ensure that partners in the public, private and third sectors continue to work together to ensure that the forecast growth in the town centre is carefully monitored, managed and delivered throughout the plan period.

2.5 Summary of proposals

The following plan summarises the key AAP proposals as detailed in chapters 3 and 4.

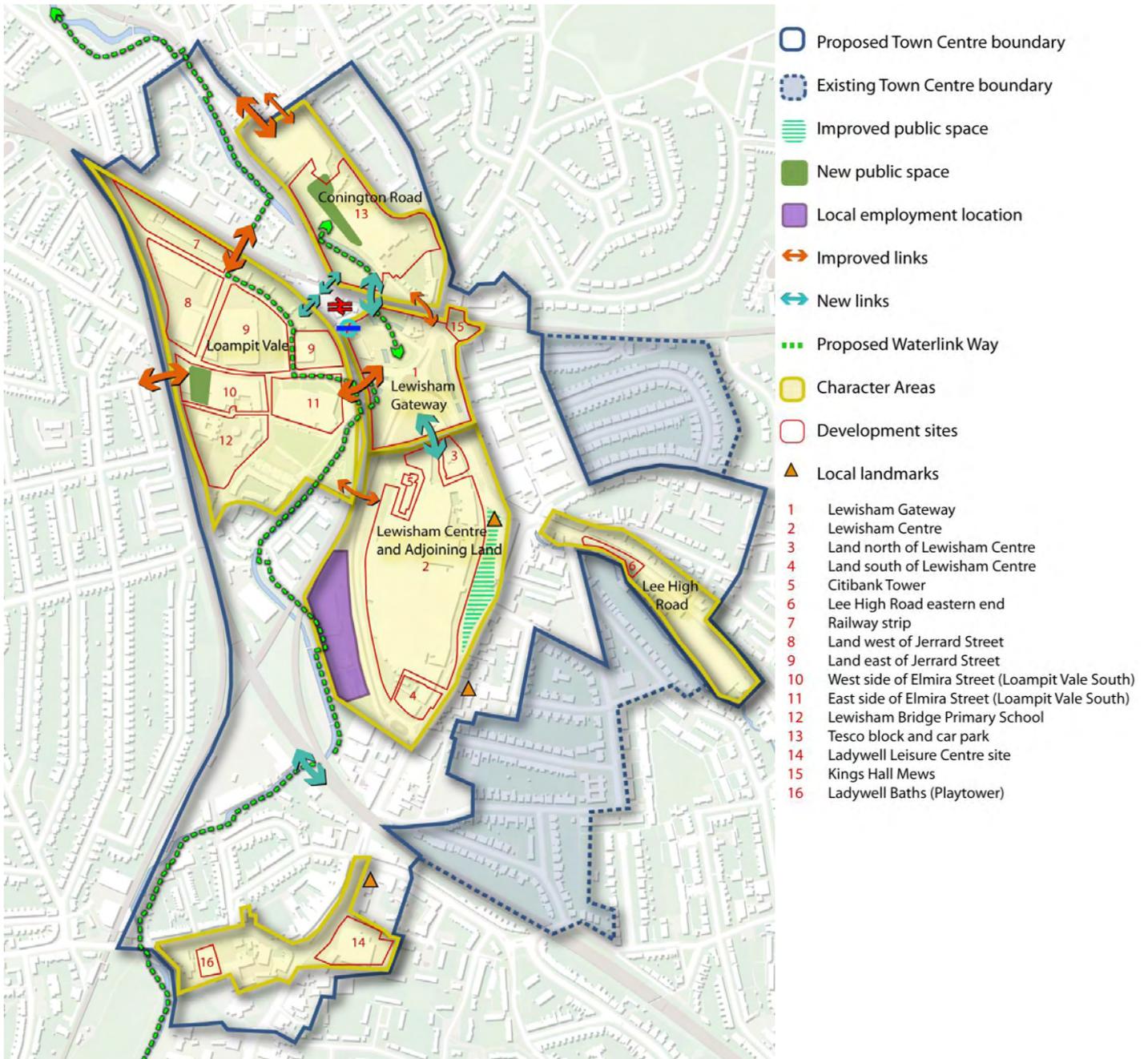


Figure 4: Summary of AAP proposals

3. AREA-WIDE SPATIAL POLICIES

3.1 Scope of the area-wide spatial policies

The purpose of this chapter is to review the process of options identification and preferred options selection. This process has enabled the identification of an updated list of options and emerging policy statements which will form the basis of the pre-submission AAP in Spring 2012.

It is important to note that the Further Options Report should be read in conjunction with the Preferred Options Report (2007) to get a full picture of the options / preferred options process.

The following headings make a distinction between the following:

- A** - Preferred policy options which are retained from the preferred options 2007 report or retained with minor amendment;
- B** - New policies based on new issues, options and preferred options; and
- C** - Policies included in the preferred options 2007 report which have been deleted from this version.

Appendix 3 provides a detailed summary and rationale for the retention, amendment or deletion of draft policies.

It is important to note that the omission of a previously proposed policy does not mean that the issue it relates to is considered to be unimportant. In the majority of cases, the removal of draft policies is because it repeats a general borough-wide policy principle which is established elsewhere in the LDF.

A. Retained or amended policies

3.1.1 Overview

A number of policy topics in the Preferred Options Report have been retained without change or subject to relatively minor amendment or refinement. Each of the following policy topics is structured as follows:

- Statement of the preferred option articulated as a draft policy statement;
- Reasons for selection of preferred option; and
- Justification of policy retention / amendments.

Each of the retained policies should be read in conjunction with the Preferred Options Report (2007). The Preferred Options Report provides a detailed narrative that tracks the development and justification of each preferred option in relation to issues, options and consultation.

Please consider the key consultation questions set out in section 1.3 in relation to each of the draft policy options set out from section 3.1.1 to section 3.1.9. In particular, we would ask you to regard the following matters:

- Are there any additional area-wide issues needing consideration in the AAP?
- Do you have any comments on the new options, preferred options or proposed policies put forward?
- Do you support the recommended options for inclusion in the AAP?
- Are there any other alternative feasible policy options?
- Do you have any other comments?

3.1.2 Housing (Issue LTC1)

Preferred option

The preferred option was a composite of all three options relating to issue LTC1 (the borough has a target of 9,750 additional dwellings to be built by 2016. How can housing need best be met in the town centre?). Option LTC1B proposed a policy which encouraged the redevelopment or conversion of existing sites with residential uses as part of a mix which formed the basis of draft policy LTC HSG3.

LTC HSG3 – CONVERSION OF EXISTING BUILDINGS [Retained without amendment]

The Council will encourage the conversion of existing buildings such as vacant offices or premises above shops for residential purposes provided that:

- a) A satisfactory living environment can be provided;
- b) There is no conflict with existing land uses; and
- c) The proposal complies with policy LTC EMP1.

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** All options received support through the issues and options consultation process with no single option identified as a favoured approach.
- **Planning policies:** The preferred option conforms to national planning policy statements (PPS1, PPS3 and PPS4) and the London Plan (policy 3A.2 and 3A.5).
- **Wider policies:** The preferred option conforms to objectives in the Sustainable Community Strategy.
- **Other planning reasons:** Housing has a major role to play in supporting the commercial vitality and viability and environmental quality of the town centre.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

Although the principle of conversion is established elsewhere within the national and regional planning framework, there is a need to provide specific policy for Lewisham town centre to clarify the circumstances in which conversion is acceptable and appropriate. Policies 2.15 and 3.3 of the draft replacement London Plan (2009) continue to support the delivery of housing through brownfield development including town centre locations.

No specific feedback was received on draft policy LTC HSG3 during the Preferred Options consultation and as such it has been retained without amendment.

3.1.3 Shopping and town centres (Issue LTC6, LTC8, LTC9 and LTC10)

Vitality and viability (Issue LTC6)

Preferred option

Issue LTC6 asked “How can Lewisham town centre’s vitality and viability be best supported?” The preferred option adopted a composite approach which drew on all eight options identified at the Issues and Options stage. In addition to an overarching policy supporting vitality and viability (LTC SH2), the Preferred Options report also identified a specific policy which highlighted the importance of supporting the vitality and viability of the market.

LTC SH2 – VITALITY AND VIABILITY [Retained with amendment]

Development should sustain and enhance the vitality and viability of the town centre in the context of the strategic development of Lewisham Gateway. To ensure this, the Council will encourage the following:

- a. Implementation of Lewisham Gateway proposals (see Core Strategy Strategic Site Allocations Policy 6);
- b. Public realm enhancements (see LTC URB6);
- c. Retail and mixed use allocations on key development sites (LTC URB4);
- d. A greater mix of uses including cafés, bars and other evening economy uses to support vitality of retail offer (see LTC SH8);
- e. Incorporation of design principles such as a mix of uses, active frontages and effective street lighting with a view to making the town centre a safer place (see LTC URB4, LTC URB5 and LTC URB6);
- f. Shopfront improvements and funding programmes (see shopfront Supplementary Planning Document);
- g. A greater component of residential development within the town centre within the overall mix of uses (see Core Strategy and London Plan targets);
- h. Provision of community and leisure facilities (see LTC COM1 and LTC COM2);
- i. Retention and/or reprovision of employment and office uses in the town centre (see LTC EMP1 and LTC EMP 2); and
- j. Creation of a secondary focus of activity at the southern end of the pedestrianised High Street, incorporating a mix of uses to address the change in the centre of gravity that is likely to result from the Lewisham Gateway development

LTC SH3 – LEWISHAM MARKET

[Retained with amendment]

The Council will continue to promote Lewisham Market as an essential part of the retail centre and encourage ancillary facilities in order to maintain its viability. The Council will investigate, in consultation with market traders, retailers and other town centre stakeholders, ways in which the Market can be improved including temporary use of the Market space for alternative activities (e.g. street food stalls or informal leisure activities) in the evenings and other times when the Market is not in use).

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** Consultees were supportive of all options.
- **Planning policies:** The preferred option conforms to national planning policy statements (PPS4) and the London Plan (policy 3D.1).
- **Wider policies:** The preferred option is in conformity with the Sustainable Community Strategy and the Local Implementation Plan.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

There is a clear need for a specific policy that focuses on vitality and viability as the health of the town centre and growth potential is a major strategic planning priority for Lewisham. LTC SH2 received support during the Preferred Options consultation process including a positive representation from the GLA. A number of amendments have been made to LTC SH2 as follows:

- Specific reference to the strategic Lewisham Gateway proposals to reflect the strategic importance of this site in terms of retail growth and the overall impact of vitality and viability.
- Greater emphasis on the importance of community and leisure facilities and employment and office uses in enhancing vitality and viability.
- Promotion of the southern end of the High Street as a focus for mixed use redevelopment. The purpose of this is to address the changing gravity of the town centre resulting from the Gateway development (this final point replicates and subsumes draft policy LTC SH4).

LTC SH3 was supported by the GLA and did not receive any other consultation comments. The draft replacement London Plan (2009) places a major emphasis on vitality and viability through a number of policies including 2.15, 4.7 and 4.8. An additional principle has been identified for LTC SH3 in relation to the potential use of the market area for alternative uses outside of trading hours. This relates to an ongoing Council initiative to promote the innovative use of public spaces for recreational use.

Shopping frontages (Issue LTC8)

Preferred option

Consideration of issue LTC8 (What approach should the AAP take to the designations of core and non-core shopping frontages?) led to the identification of three draft policy statements. These statements were based on a hybrid approach to the preferred option which proposed a review of the existing allocation of core and non core frontages (option LTC8B) and the introduction of a geographical basis for designating retail zones with scope for integrating a more diverse mix of uses including evening economy activities (LTC8C).

LTC SH5 – PRIMARY SHOPPING AREAS **[Retained with amendment]**

Within the Primary Shopping Areas, as defined on Figure 4, the Council will strongly resist any change of use involving the loss at ground floor level of Class A1 shops. The following factors will be taken into account when considering exceptions:

- (a) Whether the proposal harms the retail character of the shopping frontage, with an over-concentration of non-retail uses (normally 3 consecutive non A1 uses and 70% maintained in A1 use);
- (b) Whether the proposal will generate a significant number of pedestrian visits; and
- (c) Whether the proposal uses vacant units (having regard both to their number within the centre as a whole and the Core Area and the length of time they have been vacant).

All proposals for non retail development within Core Areas, including where relevant changes of use, should:

- (d) Not harm the amenity of adjoining properties, including that created by noise and disturbance, smell, litter and incompatible opening hours (all of which may be controlled by appropriate conditions); and
- (e) Where appropriate, provide attractive display windows and entrances that are compatible with adjoining shop units.

LTC SH6 – SECONDARY SHOPPING AREAS
[Retained with amendment]

Within the Secondary Shopping Areas, as defined on Figure 4, proposals for development or change of use from an A1 shop will generally be acceptable provided:

- (a) It is to another A use class, community use or amusement centre where such a change does not result in an over-concentration of non A1 uses (normally 3 non A1 uses);
- (b) It does not harm the amenity of adjoining properties;
- (c) It does not harm the retail character (with reference to Policy LTC SH7), attractiveness, vitality and viability of the centre including unreasonably reducing the percentage of A1 units; and
- (d) It is considered appropriate in relation to the area's specific retail character.

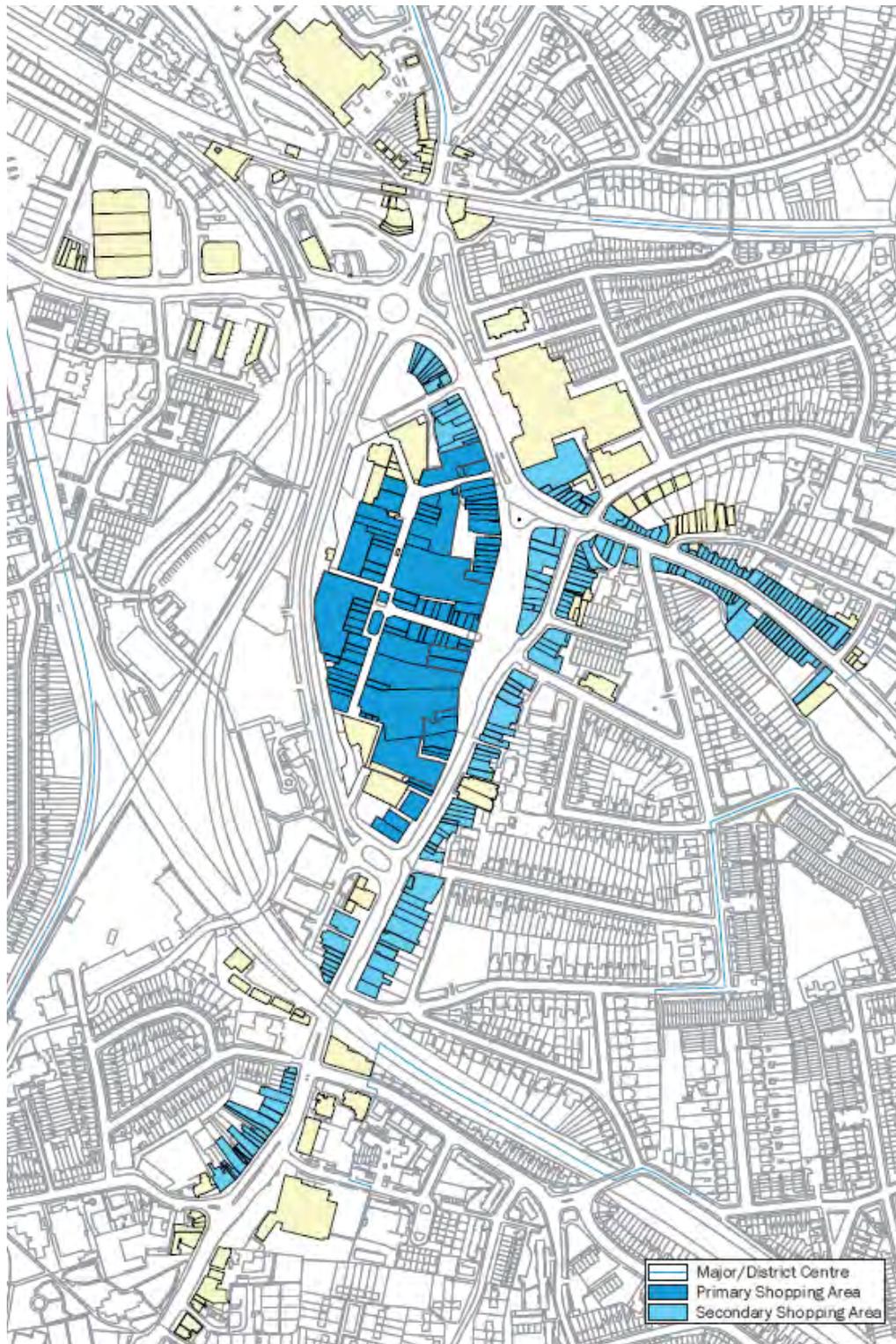


Figure 5: Primary and secondary shopping areas as defined in emerging Core Strategy (source: Retail Capacity Study 2010)

LTC SH7 – RETAIL CHARACTER AREAS

[Retained without amendment]

The town centre benefits from areas of discrete retail character which, individually and collectively contribute positively to the vitality and viability of the centre. There are also areas where major retail led developments are anticipated and the retail character that they create will be an important consideration.

Development proposals should take account of, not compromise and seek to complement existing and anticipated retail character of specific parts of the town centre as follows:

1. Lewisham Gateway

The retail character that should be aspired to in this area is a mixture of retail and leisure uses. Creation of an open space at the confluence of rivers provides opportunity for cafes, bars and similar uses.

2. Lee High Road

The western end of Lee High Road is a mixed use traditional high street with retail (A1 & A3) at ground floor and flatted accommodation above. Retailing on Lee High Road has a strong independent character and frontages are relatively short. There are already high concentrations of take-away and other non-retail uses and care will need to be taken to ensure over concentrations are not established.

3. Loampit Vale North

The retail character that should be aspired to at this 'edge of centre' location is for large retail units, with parking, to support primary shopping.

4. Ladywell Road

Ladywell is a mixed area with a good range of secondary retailing providing everyday servicing needs of the local area. Most commercial premises have shopfronts of traditional character. Ladywell Road is more residential in character, with several community uses and a limited number of commercial uses.

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** Option LTC8C was supported by the majority of consultation respondents, including the GLA.
- **Planning policies:** The preferred option conforms to national planning policy (PPS4) statements and the London Plan (policy 3D.1).

- **Wider policies:** The preferred option is conforms to the Sustainable Community Strategy.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

The frontage policies (LTC SH5 and LTC SH6) have been retained as the Council has specifically identified an intention to identify primary and secondary areas within paragraph 6.93 of the Core Strategy. The Further Options Report replaces “Core” and “non-Core” shopping areas with “Primary” and “Secondary” shopping areas to reflect the terms used in the Core Strategy.

The GLA objected to policy LTC SH5 due to the lack of an integrated approach to managing the evening economy. It should be noted that the policy LTC SH6 makes a clear link to LTC SH7 in relation to retail character. Policy LTC SH7 (alongside LTC SH8) provides a context for the introduction of evening economy uses in secondary retail areas. It is important to note that policy 2.15 of the draft replacement London Plan (2009) promotes the identification of town centre boundaries and primary / secondary shopping areas.

Draft policy LTC SH7 has also been retained reflecting the need to create a more subtle, character based approach to defining priorities for the different parts of the town centre.

Evening economy (Issue LTC9)

Preferred option

The preferred option for issue LTC9 (How should the town centre’s potential for a more vibrant evening economy be managed?) is based on options LTC9C and LTC9D. As such, draft policy LTC SH8 seeks to encourage evening economy uses as part of a mix of uses in specified locations and concentrate evening economy uses in a particular zone.

LTC SH8 – CRITERIA FOR EVENING ECONOMY USES **[Retained with amendment]**

Overall approach: The Council will encourage proposals for new uses that would positively contribute to the evening economy of the town centre where the following criteria are met:

- (a) The retail character of the area is not harmed (with reference to LTC SH7), and in particular the retail character of the primary shopping area;
- (b) The proposal would contribute positively to the character of the particular area, as outlined in the LTC SH7; and
- (c) The cumulative impact of the proposal does not unreasonably harm the living conditions of nearby residents, including that created by noise and disturbance from users and their vehicles, smell, litter and unneighbourly opening hours.

Suitable town centre locations: It is considered that the following areas would be suitable locations for evening economy uses, as part of a wider mix of uses:

- (a) Lewisham Gateway
- (b) Lewisham High Street between Limes Grove and Morley Road
- (c) Ladywell
- (d) Lee High Road

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** Respondents supported the promotion of evening economy uses in Lewisham town centre with responses showing support for options LTC9C and LTC9D.
- **Planning policies:** The preferred option conforms to national planning policy statements (PPS4) and the London Plan (policy 3D.4).
- **Wider policies:** The preferred option is in conformity with the Sustainable Community Strategy.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

The promotion of evening economy uses continues to be a priority for Lewisham town centre and it is important that the AAP defines a context for delivering this objective. The GLA objected to draft policy SH8 during the Preferred Options consultation and suggested it needed further detail of development management criteria. The council is preparing a separate Development Management DPD and proposes to include detail of such criteria through that process. Paragraphs 4.34 and 4.35 of the draft replacement London Plan (2009) highlight the importance of

supporting and managing the night time economy. No further feedback of concern was received on the draft policy and as such it has been retained without amendment.

Town centre boundary (Issue LTC10)

Preferred option

Consideration of issue LTC10 (should the town centre boundary be altered) resulted in the identification of a new town centre boundary which removed areas LTC10B(iii) and LTC10B(iv) from the town centre boundary.

LTC SH9 - TOWN CENTRE BOUNDARY [Retained without amendment]

The AAP boundary is defined as set out in the following plan:



Figure 6: Town centre boundary (solid line indicates existing boundary; dashed line illustrates amended boundary)

Reasons for selection of preferred option

The areas removed include the north-west corner of the town centre west of the DLR and north of the railway and the Conington Road area east of the DLR and north of the railway.

This preferred option was selected for the following reasons:

- **Consultation:** The preferred option is not consistent with the preference of the majority of consultees who declared a preference for maintaining the existing town centre boundary. The GLA stated that any change to the boundary of the town centre should be the result of a thorough review which would need to justify any changes to the current designation.
- **Planning policies:** The preferred option conforms to national planning policy statements (PPS4).
- **Other planning reasons:** These areas are predominantly residential and therefore are considered not to contribute positively to the centre's vitality and viability. As such the removal of the two areas will result in a tighter, more logical and defensible town centre boundary.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

Identification of the town centre boundary is a part of the core remit of the AAP. Feedback from the GLA to the Preferred Options consultation confirmed that there is no objection in principle to redefinition of the town centre boundary. Policy 2.15 in the draft replacement London Plan highlights the importance of reviewing and identifying town centre boundaries through the LDF process. In this context there are no further alterations to the boundary.

3.1.4 Urban design (Issue LTC11)

Preferred options

The key issue identified at the Issues and Options stage related to the approach to the location and design of tall buildings in Lewisham town centre (issue LTC 11). The criteria-based preferred option has subsequently been removed from the scope of the AAP as it repeats guidance which is identified elsewhere within the planning framework. However, a number of additional urban design policies were identified at the Preferred Options stage which expand upon the preferred options associated with other issue topics as follows:

- Mixed use (LTC URB4): LTC URB4 expands on principles “c” and “e” under policy LTC SH5 (vitality and viability). It relates to option LTC6G in response to issue LTC6.
- Urban enclosure, grain (LTC URB5): LTC URB5 expands on principle “e” under policy LTC SH5 (vitality and viability). It relates to option LTC6G in response to issue LTC6.
- Public realm (LTC URB6): LTC URB6 expands on principle “b” under policy LTC SH5 (vitality and viability). It relates to option LTC6A in response to issue LTC6.
- Enhancing Lewisham’s waterways (LTC URB7): LTC URB7 provides urban design principles that relate to LTC OS2 (Waterlink Way and Celebrating the River Confluence) and LTC ENV1 (Protect and enhance the environs of the Rivers). As such LTC URB7 relates to options LTC13C and LTC16A in response to issues LTC13 and LTC16 respectively.

LTC URB4 – MIXED USE **[Retained without amendment]**

An appropriate mix of compatible land uses will be encouraged both vertically and horizontally in Lewisham Town Centre. In particular, high density residential development above ground floor retail and commercial uses will be encouraged. Wherever possible, new development should be designed to accommodate active uses at ground floor level, with significant amount of window display and entrances.

LTC URB5 - URBAN ENCLOSURE, GRAIN**[Retained without amendment]**

Urban enclosure and urban grain play a critical role in creating good quality environments and the following principles should be considered in any proposals for development:

- (a) Public spaces should be strongly defined by the built edges that surround them and groups of building should be designed to form unified urban 'backdrops'.
- (b) Existing street patterns should be respected and where possible extended in areas of new development. Single-use and overly long blocks should be avoided.
- (c) Buildings should front public spaces, and on major streets and public spaces 'backs' of properties should be avoided wherever possible.

LTC URB6 - PUBLIC REALM**[Retained with amendment]**

Public spaces in Lewisham should be designed to be attractive, safe and robust through consideration of the following factors:

- (a) Unnecessary street clutter should be avoided, and where it is useful and functional, street furniture and lighting should be designed to delight.
- (b) The provision of public art in association with all major development in the town centre will be encouraged and should be considered at the early stages of the design process.
- (c) Development should enhance community safety through the overlooking of entrances and exits and clear definition of public and private space. Developers should show how they have taken 'Secure by Design' into account with a view to 'designing out crime'.
- (d) New development and public space improvements should be designed to improve connections into and through the town centre, particularly for pedestrians, and where possible, create new public routes. Enhancements to connections between the town centre and surrounding residential communities are particularly important.
- (e) The Council will promote opportunities to make innovative use of existing and

additional public realm areas as publicly accessible open space that can be used for recreation purposes and events and footways and civic spaces need to be generously sized, designed and managed accordingly.

(f) Development should ensure that the public realm and development projects incorporate inclusive design principles. The Council will also seek to make provision for shopmobility initiatives.

LTC URB7 – ENHANCING LEWISHAM'S WATERWAYS

[New policy]

The Council will seek to protect and enhance the environs of the River Quaggy and the River 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, in terms of public amenity and environmental quality, the provision of natural habitats, enhancement of biodiversity and the provision of effective flood defences. Where appropriate, the Council will support the de-culverting of rivers and programmes of naturalisation of riparian environments. Proposals should also respond positively to waterway heritage.

The Council will seek to safeguard Waterlink Way and the East London Green Grid network, identify opportunities to improve the continuity of the route through the town centre, and will be proactive in obtaining agreements from relevant landowners in consultation with the Environment Agency and the GLA.

The Council will also encourage the celebration of the confluence of the River Quaggy and River Ravensbourne within the redevelopment of the Lewisham Gateway site. Proposals which promote the creation of a Confluence Park will be encouraged including proposals for a new avenue linking Conington Road Area to the new Confluence Park as shown in Figure 3.

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** Consultees were supportive of the options that informed policies LTC SH5 (vitality and viability), LTC OS2 (Waterlink Way and Celebrating the River Confluence) and LTC ENV1 (Protect and enhance the environs of the Rivers)
- **Planning policies:** The preferred option conforms to national planning policy statements (PPS1, PPS4, PPG17, PPS25) and the London Plan (policies 3D.1, 3D.7, 4C.3, and 4C.31).

- **Wider policies:** The preferred option is in conformity with the Sustainable Community Strategy and the Local Implementation Plan.
- **Other planning reasons:** In relation to LTC URB7, the two river channels are both heavily degraded and currently have little amenity or ecological value. Restoration of the river environment, funded by developer contributions, would provide Lewisham town centre with a new focal point and amenity space for recreational purposes to be used by visitors and residents alike. This is particularly important as residential densities rise and pressure on existing open spaces is increased.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

Consultation feedback on the Preferred Options report indicated a high degree of support for the draft policies. In particular the GLA identified support for LTC URB4, LTC URB5, LTC OS2 and LTC ENV1. In this context, LTC URB4 and LTC URB5 have been retained without amendment.

The GLA and the Environment Agency identified two omissions which have been incorporated as follows:

- Additional references to “designing out crime”, inclusive design principles and shopmobility schemes within LTC URB6; and
- Reference to waterways heritage within LTC URB7.

Point “e” has been added to LTC URB6 to reflect the ongoing Council initiative to promote the innovative use of public spaces for recreational use and consultation feedback as highlighted above.

The Metropolitan Police asked for Secure by Design principles to be referred to in LTC URB6 – which has been done.

The Environment Agency highlighted a need for more explicit reference to flood risk and Planning Policy Statement 25. This is dealt with under the new policy heading in section 3.3.

The replacement draft London Plan (2009) continues to place significant emphasis on the importance of design excellence in relation to architecture and the public realm as set out in policies 7.4 and 7.5.

3.1.5 Employment and business (Issue LTC12)

Preferred option

The preferred option for LTC12 (What policy approach should be taken to existing established industrial areas and business uses in the town centre?) embraced two draft policy statements (LTC EMP1 and LTC EMP2). This position was based on a balanced approach which incorporates all of four options considered.

LTC EMP1 – EMPLOYMENT USES IN LEWISHAM TOWN CENTRE [Retained with amendment]

Molesworth Street will be protected as an employment site in line with the site's designation as a Local Employment Location in Core Strategy Policy 2.

In general, the Council will seek to retain or re-provide existing employment uses in the town centre (uses falling within the category of Use Class B).

In recognition of the opportunity to enhance vitality and viability of the town centre, the Council will consider redevelopment or conversion of other employment sites/buildings for a mix of uses. It is envisaged that redevelopment proposals will enable the intensification of sites and as such there is an opportunity to re-provide employment floorspace as part of a wider mix of uses, including residential. Employment sites which will be considered for redevelopment include the following:

- (a) Former Beatties building (offices over ground floor retail);
- (b) Engate Street;
- (c) Thurston Road and Jerrard Street;
- (d) Conington Road; and
- (e) Citibank Tower.

The conversion of other existing employment sites to a mix of uses including residential may be considered acceptable where:

(a) The building has been vacant for at least 2 years and appropriately marketed for that length of time, and evidence is provided to this effect; and

(b) The scheme will considerably assist in meeting other regeneration objectives such as:

- Improvement to the vitality and viability of the town centre;
- Meeting the Borough's housing priority needs; and/or

- The provision of community and leisure facilities within an accessible and socially inclusive location.

(c) The design is capable of longer term adaptation

LTC EMP2 – OFFICE USES IN LEWISHAM TOWN CENTRE [Retained with amendment]

Lewisham Town Centre is the preferred location for large scale office development in the Borough and the Council will seek to promote new office development where appropriate. The Council will resist the loss of office space in the town centre with reference to the criteria identified in LTC EMP1. Where redevelopment entails the loss of office uses, proposals will be encouraged to re-provide this office space in a modern format.

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** Options C and D were the options favoured most by consultation respondents, and are incorporated in the preferred option.
- **Planning policies:** The preferred option conforms to national planning policy statements (PPS4) and the London Plan (policies 3B.3).
- **Wider policies:** The preferred option is in conformity with the Sustainable Community Strategy.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

Office and employment uses play a key role in contributing to the overall vitality and viability of Lewisham town centre and as such both policies are retained in the Further Options Report.

However, both the GLA and LDA objected to LTC EMP1 stating that the approach was too relaxed and did not provide sufficient restrictions to the loss of employment land. The objection stated that the Council should ensure the criteria in the Mayor of London's Industrial Capacity SPG are addressed. Areas for release should be specifically identified through the Area Action Plan process rather than through allowing loss of employment land after proof of vacancy. The

submission also noted that if any release of employment land is permitted, the period of which buildings need to be vacant and marketed should be extended to two years in line with the adopted Industrial Capacity SPG.

Policy LTC EMP2 has been updated to strengthen the position in relation to employment. The policy now distinguishes between designated employment sites (i.e. Molesworth Street which is a Local Employment Location) which are protected accordingly, and general town centre sites which do not have a formal employment designation. The policy now places greater emphasis on re-provision of employment uses which contrasts to the previous version which implied loss of office uses. The wording of LTC EMP2 has been updated to reflect the strengthening of LTC EMP2.

Policies 4.2 to 4.4 of the draft replacement London Plan (2009) outline the emerging policy position in relation to employment and office uses and the management of designated industrial sites. This guidance resonates with the approach of the Further Options Report.

3.1.6 Transport (Issue LTC15)

Preferred option

The preferred option for issue LTC15 (In the context of potential significant growth in retail floorspace in Lewisham town centre, what approach should be taken to the provision of public/shopper parking spaces in the town centre?) is based on option LTC 15B which promotes the retention of the existing levels of public parking.

In addition to the preferred approach to public / shopper spaces set out in LTC TRS2, the Preferred Options report also identifies draft policy statements relating to cycling and walking (LTC TRS3) and mitigation against the impact of roads and roundabouts (LTC TRS4).

LTC TRS2 – EXISTING PUBLIC / SHOPPER PARKING SPACES IN THE TOWN CENTRE

[Retained with amendment]

The Council will seek to retain the quantum of existing public /shopper parking spaces in the town centre as a minimum level. The Council will, where possible, also seek to broadly maintain the existing ratio of parking spaces to retail floorspace through a moderate increase in provision in line with an expansion in retail floorspace. The development of the following opportunity areas and sites are expected to involve a significant amount of new retail floorspace and all existing

and any new associated parking spaces should be publicly accessible.

- (a) Hartwell Ford site
- (b) Conington Road Opportunity Area
- (c) Loampit Vale Opportunity Area
- (d) Ladywell Leisure Centre

LTC TRS3 – CYCLING AND WALKING ROUTES

[Retained without amendment]

Opportunities should be maximised to enhance routes such as Waterlink Way, and to connect other parts of the town centre into the wider cycling and pedestrian network that links with surrounding areas should be maximised.

LTC TRS4 – MITIGATING AGAINST THE IMPACT OF ROADS AND ROUNDABOUTS

[Retained with amendment]

The Council will support measures to improve the visual, and pedestrian and cyclist experience of the town centre, including at the following locations:

- (a) Northern roundabout;
- (b) Loampit Vale;
- (c) Lee High Road and Belmont Hill;
- (d) Lewisham High Street;
- (e) Molesworth Street;
- (f) Southern roundabout; and
- (g) The junctions at Ladywell Road / Lewisham High Street / Courthill Road.

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** The most popular options were the rationalisation of existing provision to encourage increased use of public transport (option LTC 15A) and the retention of existing levels of parking (option LTC 15B). The GLA and TfL both stated support for option LTC 15A. Consultation support for the encouragement of public transport (option LTC15A) as well as wider support for public realm enhancements (option LTC 6A) necessitated the identification of specific policy statements to provide a context for an improved street environment for walking and cycling (LTC TRS3 and LTC TRS4).

- **Planning policies:** The preferred option conforms to national planning policy statements (PPG13 and PPS4) and the London Plan (policy 3C.23).
- **Wider policies:** The preferred option is in conformity with the Sustainable Community Strategy.
- **Other planning reasons:** Notwithstanding the response received from the GLA, the preferred option indicated that existing levels of public parking in Lewisham town centre should be retained in line with option LTC15B. It is important to maintain the existing level of public parking, and to allow a moderate increase in line with a growth in retail floorspace with a view to maintaining and enhancing the competitive position of the town centre.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

The GLA registered support for LTC TRS2, LTC TRS3 and LTC TRS4 during the Preferred Options consultation. Chapter 6 of the draft replacement London Plan (2009) identifies a series of policy priorities which provide a supportive context for the emerging AAP policies above.

In addition, the rationale for the preferred option continues to apply. If Lewisham is to achieve Metropolitan Town Centre status it must continue to be competitive with other comparable Inner London town centres. The AAP promotes a context for enhanced public transport accessibility, but the centre must be attractive for car borne shoppers as well. The Council's public parking strategy is a pragmatic one. The existing Clarendon and Slaithwaite surface car parks are retained and continue to serve traffic arriving from the east and south respectively. Development of the Ladywell Leisure Centre site has some potential for further public parking for traffic coming from the south, development of sites in Thurston Road provides some public car parking for traffic coming from the west and existing car parking associated at the Tesco store continues to provide public car parking for traffic coming from the north. All of these car parks should prioritise disabled drivers and those with children. The provision of public parking at these key gateways into the town centre, coupled with improved signs and real-time information on the availability of spaces, should help enable drivers park at the first available parking area and help prevent through-traffic from those circling to find a parking space. In support of the edge of centre provision, the Lewisham centre multi-storey car park and the Molesworth Street surface car park will continue to provide central parking.

The principal amendment to LTC TRS2 relates to the identification of specific sites for publicly accessible car parking. In response to representations on the

Preferred Options report and further analysis of deliverability, the Engate Street site is no longer identified as a location for additional car parking. Since the publication of the original report, the Ladywell Leisure Centre has come forward as a potential development site and may be appropriate for some public car parking as part of a wider mix of uses.

3.1.7 Community and leisure

Preferred option

Previous stages of the AAP process identified a specific approach to options and preferred options as informed by wider Council decision-making issues which were progressed outside of the planning process.

The key issue was the identification of the location of a new secondary school in the town centre. Following detailed process of options development and appraisal, Lewisham Bridge School was selected as a preferred option. As identified in section 1.2.3, proposals for Prendergast Vale College have now received planning consent and construction is targeted to commence in early 2011 which removes the need for a specific preferred option policy position in relation to secondary school provision.

In a similar context, the need for a specific policy position relating to leisure centre provision has also been removed following confirmation that a new leisure centre will be delivered on the Loampit Vale site which will replace Ladywell leisure centre. In line with option LTC 6G, the Preferred Options Report also recognised the need to promote a mix of uses to support overall vitality. In this context, the following draft policy statement has been identified:

LTC COM3 – RANGE OF COMMUNITY, LEISURE AND ENTERTAINMENT SPACES

[Retained with amendment]

In order to contribute to town centre vitality, the Council is supportive of the provision of a flexible community spaces along with a range of leisure and entertainment uses in Lewisham Town Centre. In particular, the Council will be supportive of proposals for a cinema in the town centre, and a site at the northern end of the centre, such as the Lewisham Gateway site, is considered to be an appropriate location.

The AAP is proactive in identifying opportunities for additional community and leisure facilities as follows:

- Refurbishment of the Playtower building on Ladywell Road into a multi-use community asset
- Potential for further enhancement of the Leemore Resource Centre on Lee High Road.

The Loampit Vale Leisure Centre will provide a significant improvement in the provision of indoor sports and leisure facilities in the town centre, enabling the development of the Ladywell Leisure Centre site for other uses. The redevelopment of other existing community, leisure and entertainment spaces for alternative uses will only be permitted if it can be demonstrated that:

(a) the facility is no longer needed or an equivalent facility can be replaced at an alternative site with an equal or improved level of accessibility;

(b) the locational requirements for the facility are not met;

(c) the facilities need updating which cannot be achieved at a reasonable cost; and/or

(d) alternative provision of equivalent benefit to the community is made.

Opportunities also need to be maximised for the provision of enhanced/additional leisure and sports facilities in and around the town centre.

Justification of policy retention and amendments

There continues to be a need to promote community, leisure and entertainment uses within the town centre to contribute to overall vitality in line with PPS4. It should also be noted that the GLA registered support for LTC COM3 which continues to be reflected within chapter 3 of the draft replacement London Plan (2009).

Government Office for London highlighted an opportunity to make the policy more specific to the town centre. The policy statement above has therefore been altered to provide a clearer and more positive overview of proposals for community, leisure and entertainment facilities proposed within the town centre.

The Council is working with Voluntary Action Lewisham, a local church group and others to develop a project for the refurbishment of the Playtower Building on Ladywell Road into a multi-use community asset. This would involve establishing

a trust and transferring the building out of Council ownership. Further needs for community premises, including the apparent demand for additional churches (as evidenced by the number of unauthorised churches in the Thurston Road area) will be informed by the Council's emerging Community Premises Strategy.

Additional options associated with social infrastructure provision are outlined in the new options section in 3.3.

3.1.8 Monitoring

Preferred option

Government guidance outlines a clear requirement for monitoring as part of the plan-making process. As such the following policy was prepared at the Preferred Option stage without the need for specific issues and options.

LTC IMP1 – MONITORING **[Retained with amendment]**

The Council will facilitate the monitoring of the AAP through the monitoring framework and the following interventions:

- (a) Adherence to PPS4 recommendations for town centre healthcheck monitoring;
- (b) Monitoring progress on planning applications;
- (c) Reporting progress on infrastructure delivery to the Asset Management Board and Sustainable Development Partnership; and
- (d) The inclusion of a town centre specific section in the Annual Monitoring Report (AMR)

The full monitoring framework including indicators, targets, trends and indicator sources, can be viewed in Appendix 4.

Justification of policy retention and amendments

The requirement for a clear and effective approach to monitoring continues to apply and the draft policy statement has been subject to minor updates to reflect the approach taken to monitoring within the Core Strategy. LTC IMP1 received support during the preferred options consultation. The identification of the preferred option has also been tested through the Sustainability Appraisal/SEA.

B. New options, preferred options and policies

3.1.9 Overview

The Further Options Report draws on a detailed review of consultation comments, the updated evidence base, alterations in the planning policy framework and changes in the wider policy position, recent development activity and changes in the economic and public sector spending climate. In this context, new options, preferred options and draft policy statements have been identified for the following planning issues:

- Decentralised energy;
- Social infrastructure; and
- Implementation.

Each of these new policy topics is structured using the same comprehensive approach as utilised in the Preferred Options report as set out below. In replicating the structure of the Preferred Options report for these new policy topics, the Further Options Report ensures that all policy topics have been subject to a consistent and equivalent process of review.

- Issue – concise overview of the issue in question;
- What do other plans and programmes say?
- Options – overview of the alternative options available;
- Consultation – feedback through consultation to date;
- Preferred option – summary of the preferred option;
- Draft policy – articulation of the preferred option as a draft policy; and
- Reasons for the preferred option.

Please consider the key consultation questions set out in section 1.3 in relation to each of the draft policy options set out from section 3.1.9 to section 3.1.11. In particular, we would ask you to regard the following matters:

- Are there any additional area-wide issues needing consideration in the AAP?
- Do you have any comments on the new options, preferred options or proposed policies put forward?
- Do you support the recommended options for inclusion in the AAP?
- Are there any other alternative feasible policy options?
- Do you have any other comments?

3.1.10 Energy strategy

Issue

The Energy Strategy is one of the key areas that has moved on since the preparation of Preferred Options Report in 2007. As part of the Further Options process, the Council has initiated a focused study (Low Carbon and Decentralised Energy Strategy Recommendations, December 2010) to examine the CO₂ reduction agenda in the context of Lewisham Town Centre with a view to informing the development of a specific policy for the AAP. The full study report, which has informed the strategy outlined below, is available as part of the evidence base to the Further Options Report.

LTC 17:

What are the major opportunities for CO₂ emission reduction in Lewisham Town Centre? What role, if any, should DE play in minimising CO₂ emissions in Lewisham Town Centre? Is DE realistic and if so what options are there for delivering it?

What do other plans and programmes say?

The London Plan

The London Plan has been a driver of energy policy and its evolution is therefore of relevance when considering the future of energy in the built environment for the capital, particularly the energy requirements placed on developers of new sites and the energy solutions that therefore may emerge.

In relation to energy policy, emphasis on specific renewable targets appear to be disappearing in favour of an overall CO₂ emissions reduction target, with a suggested figure of 44% reduction from Part L 2006 for the first 3 years to 2013. However the requirement to consider decentralised energy is expected to still remain. There is some uncertainty whether this figure is to apply to the 'total' emissions (including appliance load) or whether it only applies to the regulated load that is covered by the Building Regulations. If the latter applies then the new targets appear to be lower than those that are currently set.

Lewisham Core Strategy Policies

These emerging policies support the Council's ambition for Lewisham to play a leading role in responding to climate change - locally, regionally and nationally as outlined in the Lewisham Climate Change Strategic Framework.

Emerging Core Strategy Policies 7 and 8 endorse the use of the following energy hierarchy:

- Use less energy ('Lean')
- Supply energy efficiently ('Clean')
- Use Renewable Energy ('Green')

Emerging Core Strategy Policy 8 states that proposals for major developments (with a floorspace of 1,000 sq.m or 10 residential dwellings or more) will be required, amongst other things, to:

- Submit a Sustainability Statement and Energy Statement that show how the requirements of London Plan policy and the London Plan SPG on Sustainable Design and Construction, or any subsequent document, are met and demonstrate what steps have been taken to minimise the environmental impacts of the proposed development maximise the energy and water efficiency measures of the building
- Connect to an existing or approved decentralised energy network, safeguard potential network routes, and make provision to allow future connection to a network or contribute to its development, where possible within the Regeneration and Growth Areas
- Integrate on-site renewable energy generation into the design of a building to ensure CO₂ emission reductions are maximised
- Fully contribute to CO₂ emission reductions in line with the regional and national requirements, and make a financial contribution to an offset fund if this cannot be adequately achieved on site.

A focus on demand reduction should always be the first step in CO₂ emission reduction

Options

For new buildings and major refurbishment the improvement in energy efficiency of buildings is being driven through the Building Regulations and for the existing stock improvements will come through other national policy. The AAP needs to facilitate good practice in the Clean and Green steps of the hierarchy.

Options

'Clean' and 'Green' carbon emission reductions can be achieved through application of the following list of low carbon and/or renewable energy technologies:

- **Option 17A:** Solar thermal (ST);
- **Option 17B:** Photovoltaics (PV);
- **Option 17C:** Wind turbines;
- **Option 17D:** Gas-fired CHP;
- **Option 17E:** Biomass or bio-fuel fired CHP;
- **Option 17F:** Air source heat pumps (ASHP);
- **Option 17G:** Ground source heat pumps (GSHP); and
- **Option 17H:** Decentralised energy

The Energy Strategy Recommendations report summarises the suitability of the various technologies outlined above in relation to achieving the AAP aspirations in relation to CO₂ emissions reduction.

Consultation

During the Preferred Options consultation, the GLA indicated that the Area Action Plan should give greater consideration to decentralised energy options. The draft policy set out below will be reviewed in response to consultation on the Further Options Report.

Preferred option

A coordinated strategy is required to inform specific energy strategies within different parts of the town centre and on specific sites or clusters of sites. In this context, the following observations are relevant:

- PV technologies are best placed to offset electrical load.
- Gas-fired CHP and solar thermal are effective at offsetting heat load (together with electricity in the case of CHP).
- The CHP option can be implemented at either a building or a community scale.

Based on this analysis, the Energy Strategy Recommendations report indicates that whilst a range of technologies are potentially suitable, the following measures are the preferred options in relation to the town centre:

- Solar thermal (Option 17A)
- Photovoltaic panels (Option 17B);
- Gas-fired CHP (Option 17D); and
- Decentralised Energy (Option 17H)

The fragmented nature of development timetables for key sites precludes the development of a large scale decentralised energy network in the short to medium term. As such the AAP energy strategy offers a pragmatic approach which recognises the varying trajectories, phasing constraints and delivery fixes for key sites. The preferred option therefore focuses on the implementation of small schemes and a longer term plan to join individual schemes together, as is encapsulated in the London Heat map initiative.

The Council will take the following steps to monitor opportunities for decentralised energy in the town centre:

- Identify new and refurbished sites of relatively high density or large heat load.
- Identify new sites which, as part of a response to the London plan or other policy requirement, are already considering a district heat network.
- Link associated timescales of development or refurbishment with that of the AAP and of other identified sites in the vicinity.
- Establish a 'watching brief' for those sites that don't immediately fit in terms of timescale or proximity.
- For those sites that appear to have synergy, look in further detail at the characteristics of the sites e.g. in terms of logistics with respect to distance and complexity of connection, to rule out any logistical or other fundamental constraints.
- Retain any sites discarded at this stage on the 'to watch' list.
- For the short list of sites, facilitate further detailed assessment of logistical and technical issues such as potential energy centre locations, connecting pipework routes and operator issues.

Potential clusters

The Council will seek to promote the following decentralised energy clusters:

Cluster 1: Loampit Vale

This is a potential future cluster and should be placed on the 'to watch' list. This system would comprise two energy centres and resilience linking, as well as the possibility for connection to the swimming pool as and when there is a major pool refurbishment. In addition an expansion in retail floorspace, the Tesco site has

capacity for a significant number of new homes and an energy centre. Although beyond the timescales of the AAP, the existence of an energy centre at Loampit Vale South and the development of one on the Tesco site could act as a catalyst for future linkages to developments in the area, including on Thurston Road.

Cluster 2: Lewisham Gateway

The outline consent for Lewisham Gateway makes provision for an energy centre and there is scope to consider longer term options to link into adjacent sites as the detailed scheme for the Gateway is progressed. In terms of planning for a phased approach it is recommended that the solutions for early phases are based on the installation of temporary high efficiency gas boilers, used to provide heat and establish the concept of district heating. Then once a critical mass on installation has been established the connection and conversion into a wider system can be progressed. Potential anchor loads include the Lewisham Centre.

Cluster 3: Ladywell Road area

This area is part of Lewisham's Low Carbon Zone where Lewisham is working with the Mayor of London, GLA and a range of public, private and community sector groups to deliver a reduction in CO₂ emissions of 20% by 2012 and a 60% reduction by 2025. The Ladywell Leisure Centre is a key Council-owned development site and there is an opportunity to incorporate decentralised energy, possibly linking into University Lewisham Hospital to the south of the AAP area.

For the reasons set out above, above and identified in greater detail in the energy strategy recommendations report, the preferred option is to require all 'major developments' to integrate clean and green technological solutions that maximise CO₂ emission reductions and ensure future development of cluster and area-based DE networks are promoted and protected. This adopts a pragmatic approach which reflects current policy guidance, draws on a qualitative assessment of energy loads and responds to the likely phasing and varying implementation programmes and technical fixes for key sites.

Draft policy

NEW POLICY 1 – CARBON DIOXIDE EMISSION REDUCTION IN LEWISHAM TOWN CENTRE

All proposed development will be expected to minimise energy consumption through the adoption of sustainable design and construction methods.

Prospective developers are encouraged to liaise with the Local Planning Authority at the pre-application stage when considering potential site-specific energy strategies. Planning applications for 'major development' are expected to be supported by a Sustainability Statement and Energy Statement (in accordance with Core Strategy Policy 8) which, amongst other things, provides a comprehensive assessment of the nature of heat and electrical loading to inform the approach.

The following methods should be considered as part of potential energy strategies:

- PV technologies to offset electrical load.
- Gas-fired CHP and solar thermal to offset heat load (together with electricity in the case of CHP).
- CHP option, which can be implemented at either a building or a community scale.

All 'major development' will be expected to incorporate communal heating which future-proofs the development and allows for larger scale decentralised energy clusters to be developed in the medium to long term, in some cases beyond the plan period. Where it has been demonstrated that a communal heating system would not be the most suitable option in the short to medium term, the development should ensure a connection can still be facilitated in the medium to long term. In doing so developments should:

- Incorporate energy centres that are appropriately sized not only to accommodate the interim requirements of CHP/other centralised plant, but to accommodate a 'consumer substation unit' – to provide all the necessary equipment for a connection to a heating network and for domestic hot water preparation;
- Where a communal heating system is not installed, incorporate pipework to the edge of the site, ensuring the likely shortest distance to future networks;
- Locate energy centres close to a street frontage (but without creating 'dead frontage' to a street), ensuring the likely shortest distance to future networks; and
- Safeguard routes from site boundaries to energy centres to enable a connection to be made to a network in the future.

The Council will actively pursue options for decentralised energy by, amongst other things:

- Monitoring opportunities and managing and co-ordinating development proposals;
- Working with public and private sector stakeholders;
- Facilitating further detailed assessment of logistical and technical issues such as potential energy centre locations, connecting pipework routes and operator issues for sites/clusters that have potential; and
- Working with Transport for London and utility companies, seek to facilitate potential pipework routes when undertaking any major highway works.

Reasons for the preferred option

The preferred option balances a flexible approach to allowing developers to identify the most appropriate technological solution to reduce CO₂ emissions, with the need to future-proof all developments to ensure the longer term viability of a potential DE network. The identification of the preferred option has also been tested through the Sustainability Appraisal/SEA.

3.1.11 Social infrastructure

Issue

At the Issues and Options stage (2005), a small number of policy topics were highlighted as “other issues” for consideration under the Community and Leisure heading. Whilst relevant to the AAP, they were not considered key town centre issues that required specific options at that stage in the plan-making process. The specific policy topics are:

- Ensure adequate provisions of education and community facilities.
- Prevent the loss of existing leisure, community, arts, cultural, entertainment, sports, health care, child care and education facilities as a consequence of redevelopment or change of use

The loss of existing facilities is covered by general policies in the London Plan and the Council’s emerging Core Strategy. The need for community facilities is addressed under Community and Leisure above. Social Infrastructure, in terms of education, health and child care is an area which has been identified as a potential gap in the scope of the AAP. In order to bring the social infrastructure topic area up to the same level of detail as other AAP policy topics, the following new issue has been defined:

Issue 18:

What social infrastructure is required to support the projected growth in the town centre during the plan period?

What do other plans and programmes say?

PPS1 requires the Development Plan Documents to promote development that creates socially inclusive communities. In particular the Council needs to ensure the social impacts of development are considered and taken into account and social inequalities are reduced.

The existing and draft replacement versions of the London Plan aim to protect and enhance social infrastructure and community facilities which encompasses the voluntary and community sector. Core Strategy policies 19 and 20 promote the provision and maintenance of community and recreational facilities and the delivery of educational achievements, healthcare provision and promotion of healthy lifestyles. The Lewisham Social Inclusion Strategy seeks to ensure that all relevant services can work together to achieve social inclusion for all.

Options

Option 18A

Increase primary school capacity in the Primary Place Planning Localities that serve the town centre

Option 18B

Increase secondary school capacity

Option 18C

Define a specific childcare approach for the town centre

Option 18D

Increase primary health care provision

Consultation

The Council has undertaken focused stakeholder consultation with representatives from key Council departments and partner organisations such as NHS Lewisham. This has informed the identification of a composite preferred option and the preparation of a draft policy statement.

Preferred option

The preferred option is a composite of options 18A to 18D. As set out in the policy statement, the scope of emerging guidance varies depending on the extent of town centre need for each aspect of the preferred option.

Draft policy

NEW POLICY 2 – SOCIAL INFRASTRUCTURE

The Council working with public, voluntary, community and private sector partners will ensure that social infrastructure provision in and around the Town Centre is sufficient to support the growth promoted by the AAP and that it is delivered in a timely manner that keeps pace with the delivery of additional homes.

Primary School Capacity

Primary places in the Borough are managed on the basis of six Primary Place Planning Localities (PPPLs). There are two PPPLs that cover the town centre and

surrounding areas; Lee Green (PPPL2) and Lewisham/Brockley (PPPL3). The IDP takes account of the level of change advocated in this Further Options report and looks ahead 10 years. Taking the two PPPLs that serve the Town Centre together, the expected need is for an additional 284 places (9.5 Forms of Entry) by 2012/13, although this is projected to reduce slightly by 2019/20.

Possible ways for meeting this projected demand, over and above the committed expansion of Brockley and Gordonbrock (1 FE and 0.5FE respectively), include expanding existing schools where sites are large enough, identifying sites which may be re-commissioned as schools and identifying new sites

Secondary School Capacity

Prendergast Vale new all-through School will see an extra 120 secondary school places a year in the town centre area from 2012. Expansions at other secondary schools in the Borough (most notably Prendergast Ladywell Fields in 2009/10) will deliver an additional 135 secondary spaces between 2009/10 and 2012. Nevertheless, the IDP identifies a need for a possible additional 400-600 secondary school places by 2019/20. Secondary school place provision needs to be tackled at a Borough-wide level and the Council will seek to work with its partners to identify and bring forward the required additional capacity.

Childcare

The Council's Childcare Sufficiency Review (March 2008) reported on a study into childcare facilities across the borough (based on the four children centre service areas). This found that every ward in the borough had considerable capacity, with childcare place vacancy rates of between 7 and 26%. However, supply in Area 2, which includes the town centre, was found to be 'tight' – particularly in the Blackheath area. The Council is currently undertaking a further sufficiency review.

Primary Health Care

The proposed population increase in the three wards that comprise the town centre and surrounding area of 5,460 up to 2021 will require an additional 3 GPs (based on the ratio of 1 GP per 1,800 people). NHS Lewisham considers that there is currently sufficient physical capacity to accommodate 3 GPs within the five GP surgeries that border the town centre, although investment will be needed for some of the existing premises to make them fully fit for purpose. Lewisham NHS Hospital Trust is also proposing to provide an Urgent Care facility on the Hospital site and NHS trusts and the Council need to work together to ensure that there is sufficient space in the area to accommodate the proposed shift of 'first'

appointments from acute to primary/community sites in Lewisham by the middle of 2011.

The proposed population increase will require an additional 3 dentists (based on the ratio of 1 dentist per 2,000 people). There is considered to be sufficient vacant/proposed new non-residential space in appropriate locations (including the Lewisham Gateway Site) to easily accommodate this requirement.

Reasons for the preferred option

The preferred option conforms to the requirements of the planning framework as outlined above. The policy statement identifies specific growth targets and sites as appropriate, based on Council and partner-led infrastructure planning. The identification of the preferred option has also been tested through the Sustainability Appraisal/SEA.

3.1.12 Implementation strategy

Issue

The Preferred Options report identified implementation as a general issue to be incorporated within the scope of the AAP as a Development Plan Document. The increasing emphasis on delivery alongside the detailed development of the borough-wide approach to implementation means that there is a need for a comprehensive review of the AAP implementation strategy.

Issue 19

What approach should the AAP take to delivery and implementation?

What do other plans and programmes say?

PPS12 emphasises the importance of the deliverability of plans and the need for local planning authorities to demonstrate that necessary infrastructure to support the delivery of the the visions and proposals in Development Plan Documents.

The Core Strategy identifies the following principal aspects of delivery:

- Create the conditions required to stimulate investor confidence;
- Work with and encourage developers and landowners to bring forward land and buildings for re/development;
- Engage with other public sector stakeholders and the voluntary sector responsible for the delivery of different aspects of the Core Strategy;
- Promote and encourage the delivery of design excellence and innovation to provide the highest design quality;
- Secure necessary transport improvements, accommodate new public transport infrastructure, enhance the public realm and improve walking and cycling conditions; and
- Put in place measures to oversee the management and co-ordination of infrastructure delivery within the borough.

Options

Option 19A

Rely on the Borough-wide approach to implementation

Option 19B

Define a bespoke town centre implementation strategy

Consultation

Consultation feedback on the Preferred Options report reinforced the need for a comprehensive approach to implementation.

Preferred option

The preferred option is a hybrid of both 19A and 19B. The following policy identifies area-wide implementation strategies alongside specific town centre interventions.

Draft policy

New Policy 3

The Council will implement the AAP by working with public, voluntary, community and private sector partners and co-ordinating action, including:

- (a) Allocating sites for particular uses;
- (b) Engaging in pre-application discussions with prospective developers;
- (c) Using the Lewisham Design Panel to help secure high quality design;
- (d) Requiring planning applications to address the AAP's vision, objectives and policies;
- (e) Developing and selling its own land;
- (f) Where appropriate using its compulsory purchase powers;
- (g) Implementing the Infrastructure Delivery Plan, Local Implementation Plan and Borough Investment Plan;
- (h) Partnership working; and
- (i) Planning Obligations/Community Infrastructure Levy.

Site Allocation

The emerging Core Strategy identifies Lewisham Gateway as one of five strategic sites and formally allocates land for the provision of significant highway changes and a mixture of uses. The AAP will also allocate sites in the town centre for particular uses and provide specific policies for their development. The Site Allocations DPD Further Options Report (public consultation commenced October 2010) identified the Watergate School site (within the Ladywell Road character area as a gypsy and traveller site.

Pre-application Service

LBL encourages early discussions with officers, so that they can help to improve the quality of design, encourage greater public consultation, and give greater

certainty to developers when developing their proposals. Discussions will be focused on emerging design and access statements with thorough site analysis. The planning case officer will co-ordinate design advice from both within LBL, Lewisham Design Panel and from external organisations (such as the Greater London Authority Planning Decisions Unit) to ensure that developers and their design teams receive timely and focused design advice and that they are not presented with conflicting advice from multiple sources.

Lewisham Design Panel

The Council operates a design panel of councillors and locally-based architects and other built environment professionals to help ensure that development proposals are of the highest design quality and fully reflect and make a positive contribution to local context and character. Prospective developers of major proposals will be expected to present emerging proposals or the town centre to the Panel at an appropriate stage of design development.

Supporting Documentation

Design and Access Statements are a national requirement and LBL's Local Validation Requirements for Lewisham (July 2008) sets out additional documents that will be expected to support major planning applications in the Borough. All documents that accompany planning applications for sites in the town centre should demonstrate how the proposals would:

- Make a positive contribution towards the realisation of the vision, objectives and policies in the AAP; and
- Enable (and in no way prejudice) future development in the rest of the area from doing the same – including the phased delivery of larger sites.

LBL Owned Property

Subject to satisfying legal and strategic policy requirements, the Council will use and dispose of property it owns in the town centre in ways that will help deliver the AAP's vision, objectives and policies.

Compulsory Purchase

LBL will consider using its compulsory purchase powers where this would help secure the delivery of high quality development that is in line with the AAP vision, objectives and policies.

Infrastructure Delivery Plan

LBL has prepared a borough-wide Infrastructure Delivery Plan (IDP) in order to:

- Identify infrastructure needs and costs (including where possible phasing of development, funding sources and responsibilities for delivery);
- Further strengthen relationships between the Sustainable Community Strategy and Local Development Framework (LDF);
- Improve lines of communication between key delivery agencies and the local planning authority;
- Identify opportunities for integrated and more efficient service delivery and better use of assets;
- Provide a sound evidence base for funding bids and prioritising the deployment of allocated funding;
- Help facilitate growth in Lewisham and other growth and regeneration areas; and
- Integrate with the Planning Obligations SPD and provide the basis for any Community Infrastructure Levy charging schedule.

The IDP (current draft as of August 2010) is a 'live' document that will be used as a tool for helping to deliver infrastructure and will be monitored and revised as necessary. Its implementation will be led by Lewisham's Asset Management Board (AMB), which will report to Sustainable Development Partnership (SDP) – one of the thematic partnerships of the Local Strategic Partnership.

Local Implementation Plan

LBL will continue to use the Local Implementation Plan (LIP) process to identify and secure funding for improvements that better manage road traffic, improve public transport accessibility and promote walking and cycling in the town centre.

Borough Investment Plan

LBL is in the process of agreeing a Borough Investment Plan (BIP) with the Homes and Communities Agency (HCA) to guide public sector investment in new homes and supporting infrastructure.

Partnership Working

LBL will work as part of the Local Strategic Partnership (which includes senior representatives from Lewisham's public, private, voluntary and community sector

organisations) in delivering the vision, objectives and policies of the AAP. LBL will also work with other partners, including local businesses, the Greater London Authority, London Development Agency, Transport for London, Network Rail, rail operators, the Environment Agency, landowners and developers (through the Major Developers' Forum), utility companies (through the Lewisham Utilities Network), and others to deliver strategic change.

Planning Obligations/Community Infrastructure Levy (CIL)

LBL is in the process of adopting a Planning Obligations Supplementary Planning Document (SPD) – which sets out a tariff-based approach to the negotiation of financial contributions from developers active within the area, in line with the relevant legal and policy tests. LBL may pool contributions in order to meet significant infrastructure requirements (including those set out in the IDP).

The CIL Regulations (April 2010) introduce a new tariff for raising funds from developers to help deliver infrastructure (but not affordable housing) that LBL could use and scale back the use of planning obligations. On the local adoption of CIL or nationally from April 2014, the Regulations restrict the local use of planning obligations for pooled contributions, allowing pooled contributions to be sought to mitigate the cumulative impacts of developments from no more than five schemes.

C. Policies which have been deleted

3.1.13 List of policies

The following policies have been identified for removal from the emerging AAP. Appendix 3 details the rationale for this and identifies the documents that include policies that sufficiently address Lewisham Town Centre issues..

Please consider the key consultation questions set out in section 1.3 in relation to each of the removed policy options set out in section 3.1.12. In particular, we would ask you to regard the following matters:

- Do you have any comments on the removed policy options (See Appendix 3 for detail of removed policies)?
- Do you have any other comments?

LTC HSG1 MEETING HOUSING NEED

LTC HSG2 MIXED USE DEVELOPMENT

LTC HSG4 AFFORDABLE HOUSING

LTC HSG5 DWELLING MIX

LTC HSG6 HOUSING DENSITY

LTC HSG7 A RESTRICTIVE APPROACH TO RESIDENTIAL PARKING

LTC HSG8 TRAVELLERS' SITES

LTC HSG9 RESIDENTIAL STANDARDS

LTC SH1 LEWISHAM TOWN CENTRE

LTC SH4 IMPACT OF LEWISHAM GATEWAY ON SOUTHERN PART OF THE TOWN CENTRE

LTC URB1 TALL BUILDINGS IN LEWISHAM TOWN CENTRE

LTC URB2 SUSTAINABILITY

LTC URB3 HIGH QUALITY DESIGN

LTC OS1 RETENTION OF METROPOLITAN OPEN LAND

LTC OS2 WATERLINK WAY AND CELEBRATING THE RIVER CONFLUENCE

LTC OS3 ENHANCING OPEN SPACE AND BIODIVERSITY

LTC OS4 NATURE CONSERVATION

LTC TRS1 LEWISHAM TOWN CENTRE PARKING STANDARDS

LTC TRS5 TRAVEL PLANS

LTC ENV1 PROTECT AND ENHANCE THE ENVIRONS OF THE RIVERS

LTC ENV2 FLOOD PLAINS

LTC COM1 LEISURE CENTRE

LTC COM2 A NEW SECONDARY SCHOOL FOR THE TOWN CENTRE
LTC COM4 MAJOR DEVELOPMENTS
LTC IMP2 COMPULSORY PURCHASE ORDER POWERS
LTC IMP3 LEWISHAM TOWN CENTRE S106 POOLING AND PRIORITIES
LTC IMP4 PARTNERSHIP AND CONSULTATION
LTC IMP5 INFRASTRUCTURE AND SERVICES
LTC IMP6 TRANSPORT CAPACITY
LTC IMP7 EDUCATION AND TRAINING SCHEMES

4. SUB-AREA SPECIFIC POLICIES

4.1 Overview

As was the case in the Preferred Options report of 2007, a series of sub-areas have been identified in the town centre within which key sites and opportunities are identified and highlighted. These sub-areas have a diverse character and present significant opportunities to enhance the social, environmental and economic health of the town centre in line with London and national planning policy. These are now called 'character areas' rather than 'opportunity areas' and there has been some adjustment, with the previously proposed Engate Street area no longer being pursued and a new Ladywell Road area being added. These character areas provide a means to realise the vision and objectives of the AAP. Specifically, these areas include a number of development sites which could deliver new retail floorspace, homes and jobs as well as contributing to sustainable patterns of transport and creating a first class environment for the benefit of all who use the centre and rely on the essential services provided within it.

Policies and proposals are put forward for the following character areas and specific sites within them:

1. Gateway character area
2. Loampit Vale character area
3. Conington Road character area
4. Lee High Road character area
5. Ladywell Road character area
6. Central character area

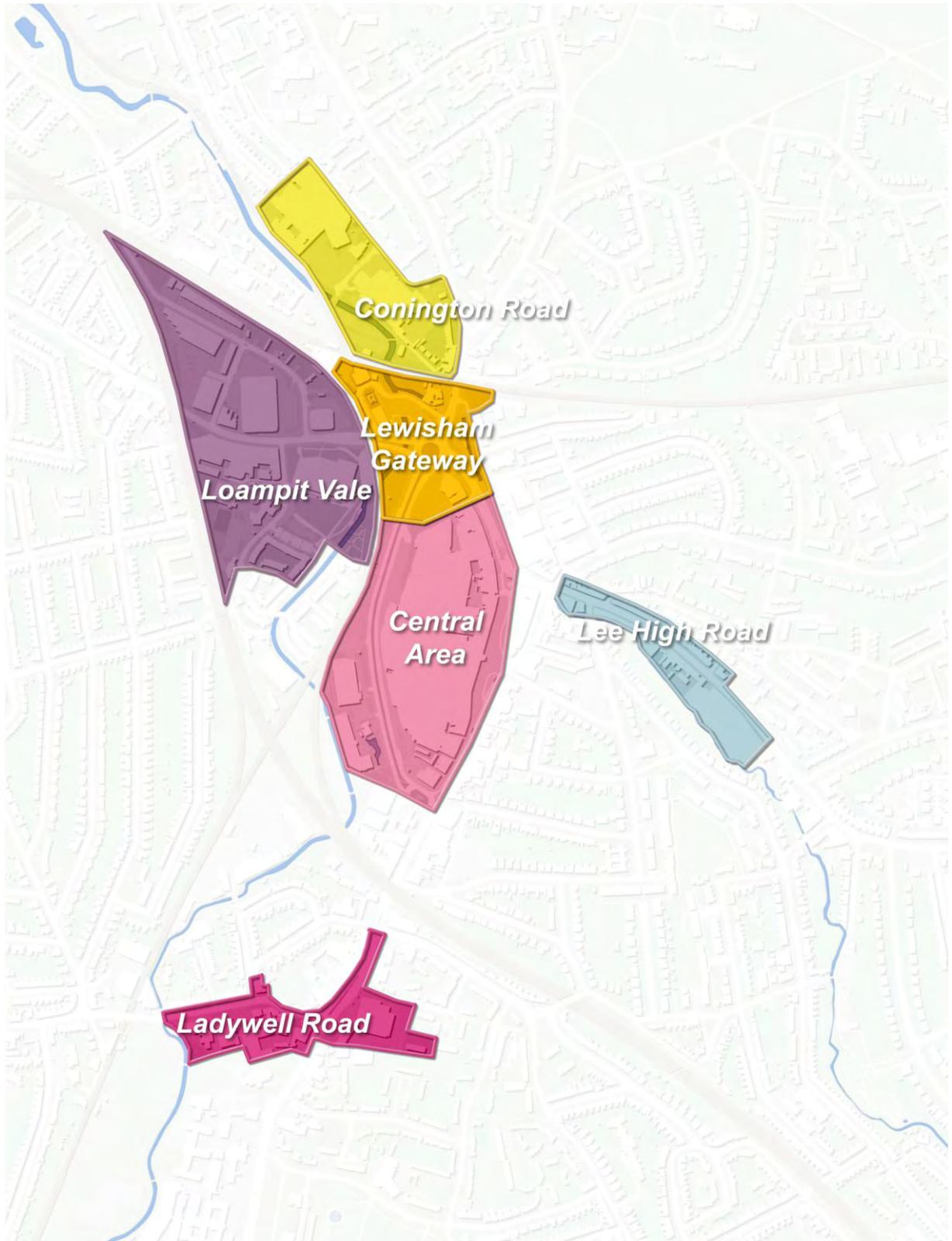


Figure 7: Character area key plan

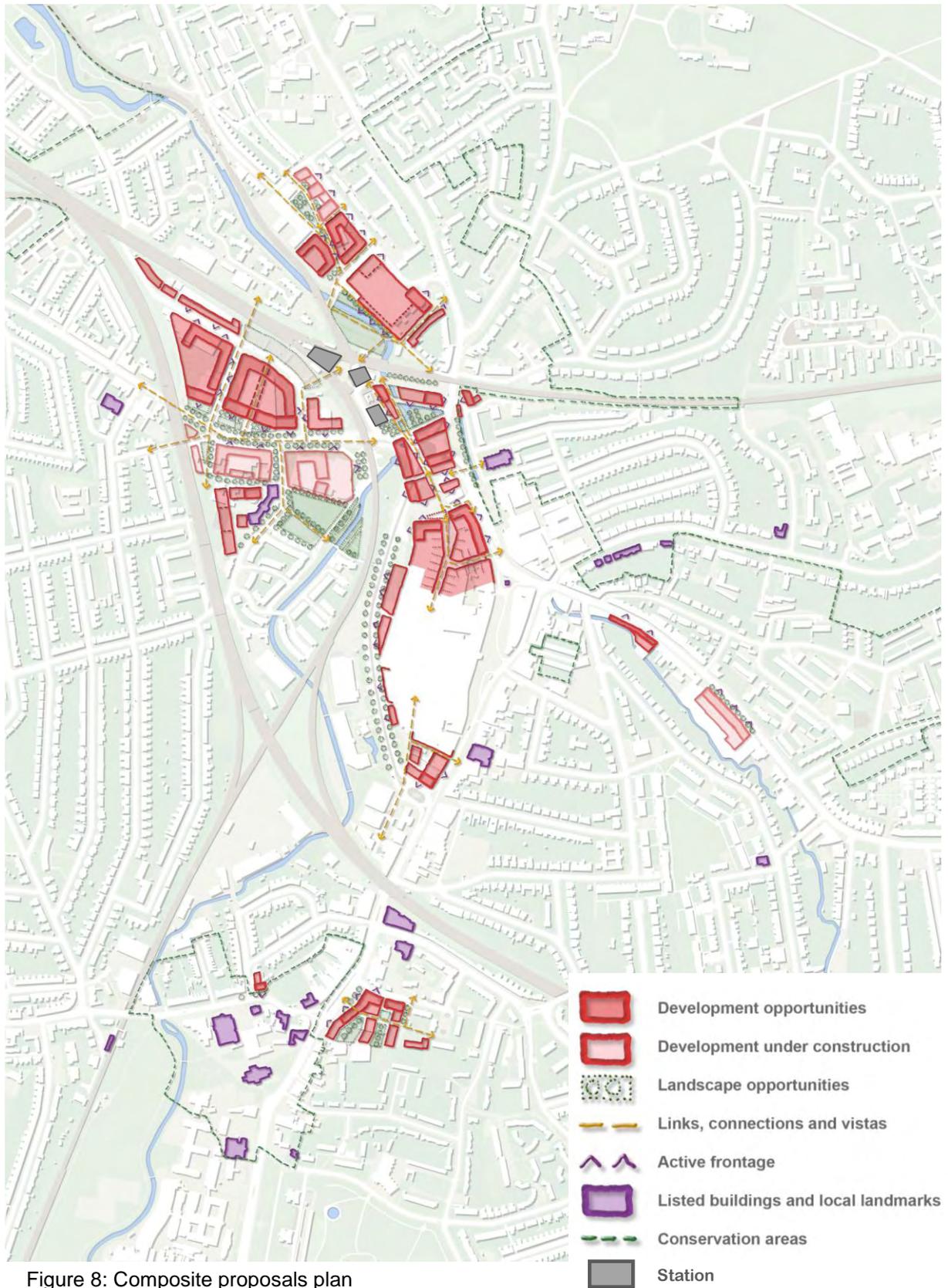


Figure 8: Composite proposals plan

4.2 Gateway character area

Please consider the key consultation questions set out in section 1.3 in relation to each of the draft policy options set out in this section. In particular, we would ask you to regard the following matters:

- Are there any additional issues regarding the Gateway character area or the sites within the area needing consideration in the AAP?
- Do you have any comments on the recommended or alternative options put forward?
- Do you have any comments on the removed policy options?
- Do you support the recommended options for inclusion in the AAP?
- Are there any other alternative feasible policy options?
- Do you have any other comments?

Setting the scene –preferred option

This character area is dominated by the northern roundabout, roads and open and cleared spaces that make up the Lewisham Gateway site. This site is identified in the Council's emerging Core Strategy as one of five strategic sites across the Borough under Spatial Policy 2 and Strategic Site Allocation 6.

A policy dealing specifically with the Gateway site is not therefore considered necessary or appropriate at this stage, although the footprint of the permitted scheme is shown on Figure 9. Lewisham Gateway's core objective of creating a more direct link between Lewisham Interchange and Lewisham High Street and the shopping centre presents a unique opportunity to radically improve the range and quality of the town's retail offer, the quality of the town centre environment and create the context for the wider regeneration of the town centre as a whole. It is this wider regenerative impact and effect that this AAP must articulate, promote and manage.

Development opportunities in the Lewisham Gateway character area have the following indicative capacity:

- 800 homes;
- 17,000 sqm net retail;
- 8,000 sqm office;
- 5,000 sqm hotel; and
- 5,000 sqm leisure.



Figure 9: Lewisham Gateway character area

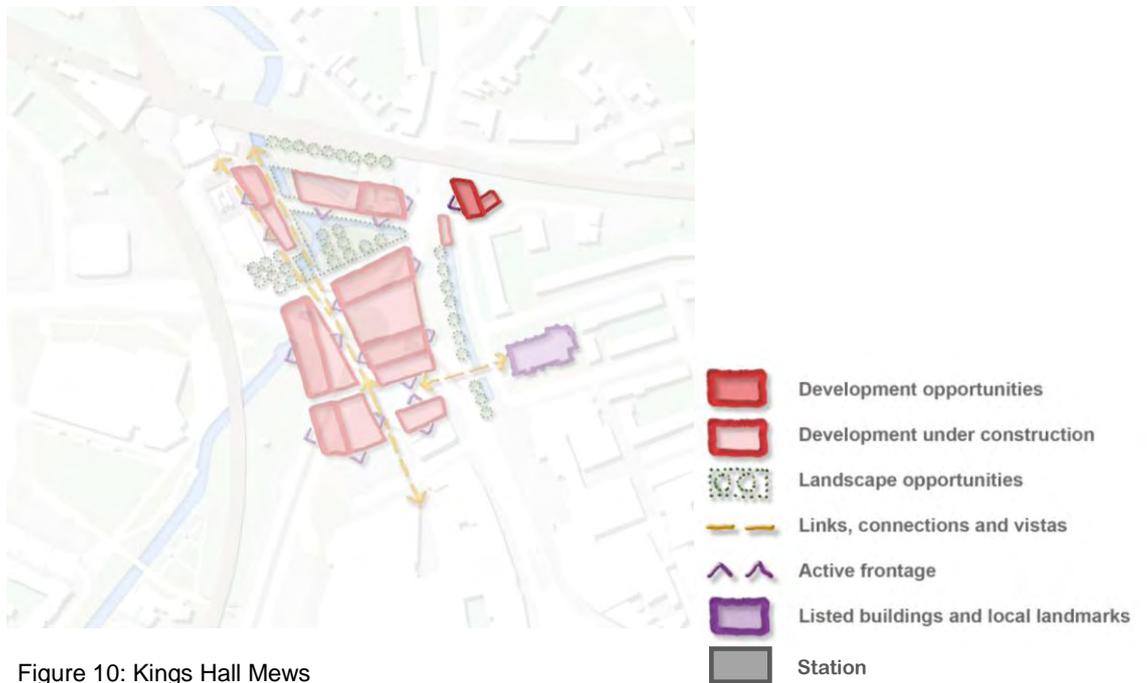


Figure 10: Kings Hall Mews

Although a draft policy statement is not therefore required for the Lewisham Gateway site, it is important to provide policy in relation to the Kings Hall Mews site to the east of the Strategic Site.

SITE SPECIFIC POLICY 1.1: Kings Hall Mews
[Extension of deleted policy LTC OPP1]

This site occupies an important location adjacent to the Lewisham Gateway site. Acceptable uses include Retail (A1 to A3), Business (B1) and a hotel (C1) and proposals will be expected to adhere to the following principles

- 1 Any proposals should be of the highest design quality and relate carefully to both the four storey Victorian terrace on Granville Grove, the St. Stephen's conservation area and proposals for the Lewisham Gateway site and provide active ground floor frontages to Kings Hall Mews and Lewisham High Street;
- 2 In the context of principle 1, proposals must be justified by a clearly articulated rationale for the proposed use(s), height, scale and massing; and
- 3 Proposals must conform to the highest quality design principles, in particular to overcome the site and environmental constraints.

The priorities for site-specific developers contributions associated with new development proposals on this site are public realm improvements to Kings Hall mews and Lewisham High Street.

[Reasons for selection of preferred option](#)

This preferred option was selected for the following reasons:

- **Consultation:** The future of the Gateway site has undergone significant consultation, through the SRB programme and the preparation of a planning brief for the site.
- **Planning policies:** The emerging Core Strategy Strategic Site Allocation 6 established policy for the Gateway site. The proposed policy for Kings Hall mews conforms to guidance at the national, regional and local scale.
- **Wider policies:** The proposals conform to the Sustainable Community Strategy.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

The removal of the general and specific policies for the Lewisham Gateway scheme relates to the strategic allocation and guidance in the Core Strategy. As identified above, an additional policy has been prepared for the Kings Hall Mews site as this is immediately adjacent and therefore requires clear guidance to facilitate the delivery of a high quality scheme.

4.3 Loampit Vale character area

Please consider the key consultation questions set out in section 1.3 in relation to each of the draft policy options set out in this section. In particular, we would ask you to regard the following matters:

- Are there any additional issues regarding the Loampit Vale Character Area or the sites within the area needing consideration in the AAP?
- Do you have any comments on the recommended or alternative options put forward?
- Do you have any comments on the removed policy options?
- Do you support the recommended options for inclusion in the AAP?
- Are there any other alternative feasible policy options?
- Do you have any other comments?

Setting the scene for the preferred option

The Loampit Vale character area forms the principal approach to the town centre from the west. It has evolved as an edge of centre location where bulky goods retailers have tended to cluster but has more recently developed into 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 improve the pedestrian environment. A number of recent schemes have been granted planning permission since the publication of the Preferred Options 2007 report, including the following:

- **Thurston Industrial Estate** – a major mixed use scheme rising to a maximum of 17 storeys comprising 6,770sqm of non-food retail floorspace, over 400 dwellings, employment space together with associated on-site parking and landscaping.

- **Bus layover site** – a site adjacent to the railway line has been identified as part of the permitted Lewisham Gateway proposal for the relocation of bus layover space.
- **Land east and west of Elmira Street** - (also known as 'land south of Loampit Vale) – major mixed use development on land fronting Loampit Vale rising to a maximum of 24 storeys. Redevelopment will comprise a replacement public leisure centre, replacement City Mission, over 750 residential dwellings, some additional retail and business space and a small amount of publicly accessible open space opposite Thurston Road. The first phases of the development are currently under construction.
- **Lewisham Bridge Primary School** – a new Prendergast Vale through-school on the site of the existing Lewisham Bridge Primary School, integrating the listed original school building.

The principal aims and opportunities for the area are to attract major investment to deliver new homes, jobs and essential community facilities within a high quality environment immediately adjacent to and linked with Lewisham Gateway. There is a particular opportunity to improve the quality of the pedestrian environment along Loampit Vale through the provision of generous tree-lined pavements, ensuring that new buildings present an active edge to the street. The future redevelopment of the area is largely secured through the various recent planning permissions granted for key sites in the character area.

The preferred option remains a composite approach to the options outlined in 2005 which responded to a series of site specific options and more general design options.

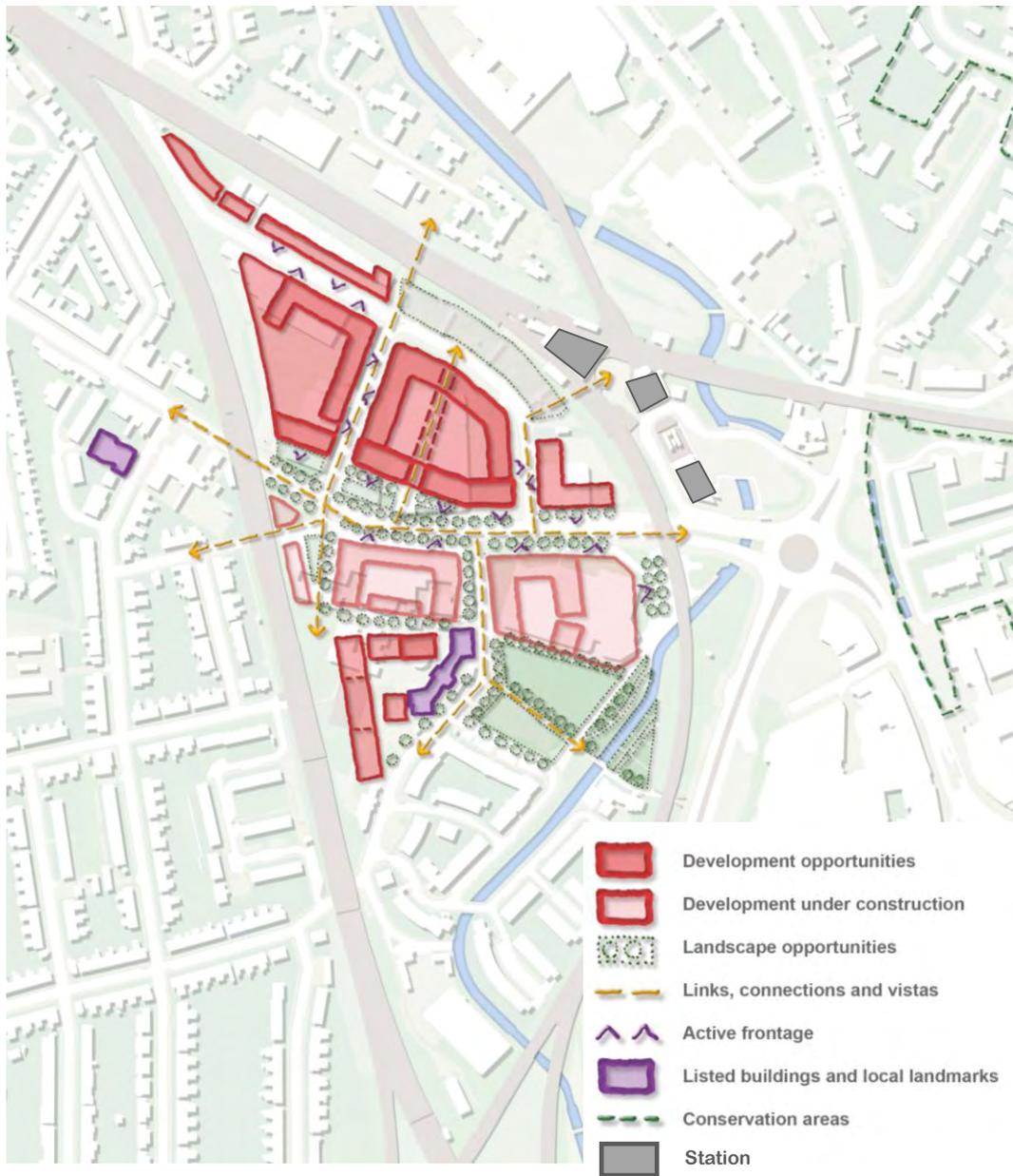


Figure 11: Loampit Vale character area

**CHARACTER AREA POLICY 2: Loampit Vale character area
[Amended version of preferred option draft policy LTC OPP4 and LTC OPP
4d]**

The Loampit Vale character area provides the western gateway to the town centre. The area has considerable capacity for urban growth and radical improvements in townscape quality.

The Loampit Vale character area has the following indicative capacity:

- 1,650 homes; and
- 13,100 sqm net retail.

New development should be coordinated to transform Loampit Vale into a wide, tree-lined urban boulevard. Key priorities for the area are as follows:

- 1 Radical improvement to the quality of the public realm in the area including pedestrian and cycle routes, facilitated by major new developments coming forward within the character area;
- 2 Major new mixed use development providing:
 - (a) residential units across a range of dwelling types and sizes in this highly sustainable location; and
 - (b) retail floor space appropriate to this location that complements rather than competes with the core town centre retail offer.

In addition to affordable housing, the priorities for site-specific developers contributions associated with new development proposals in this character area are:

- a. Public realm improvements including Loampit Vale and Jerrard Street pavement widening and tree planting;
- b. Public transport improvements;
- c. Public access to any non-residential car parking;
- d. Communal heating; and
- e. Promotion of long-term decentralised energy options (either by direct provision or by safeguarding opportunities).

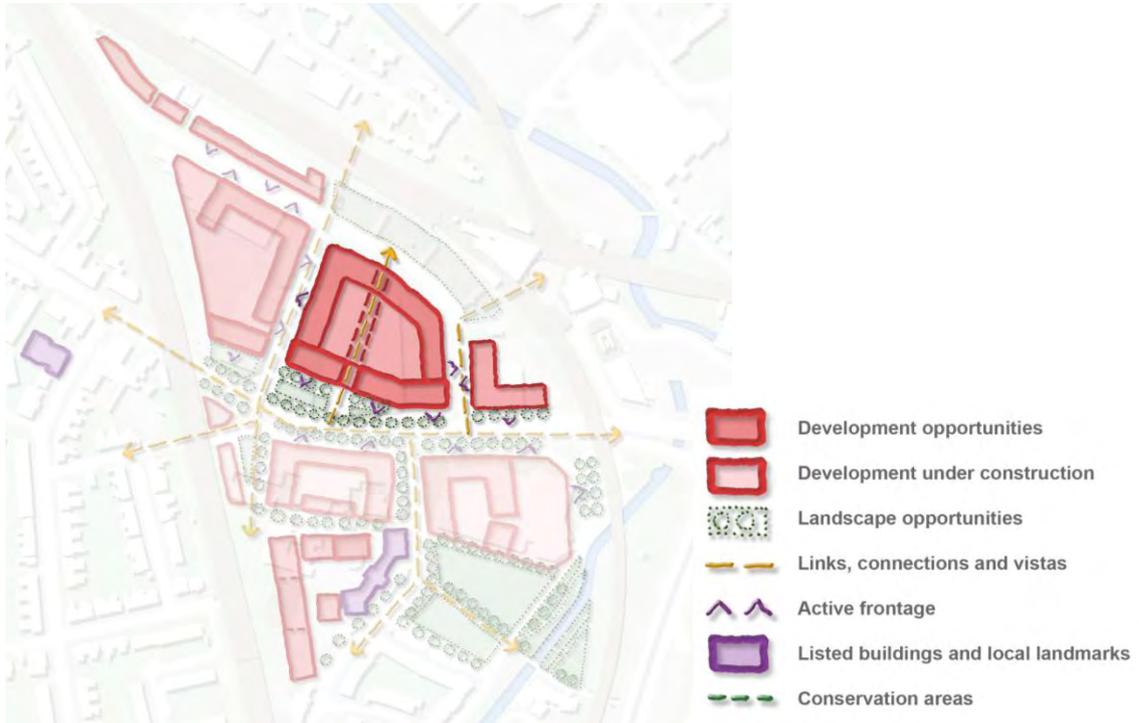


Figure 12: Loampit Vale North – east of Jerrard Street

**SITE SPECIFIC POLICY 2.1: Loampit Vale North – east of Jerrard Street
[Amended version of preferred option draft policy LTC OPP4f]**

The land east of Jerrard Street is allocated for mixed use development that will complement the mixed use development of other sites in this Character area and in the Gateway character area.

The Council will require a comprehensive masterplan which is endorsed by landowners for the land east of Jerrard Street and its surrounds that delivers the following principles:

- 1 Creation of a strong defined built edge to Loampit Vale with new development providing activities and interest at the ground floor;
- 2 Creation of generous tree lined pavements with a coordinated approach to public realm material treatment (width of 6-8m);
- 3 Taller elements of new development should address Loampit Vale;
- 4 Improvement of north-south routes across the site and under the railway lines that link to the wider hinterland;
- 5 Enhance accessibility to Lewisham Station where possible;

- 6 Dedicated bus lane for turning from Loampit Vale into Jerrard Street which may require building lines to be set back to facilitate the necessary depth of pavement;
- 7 Jerrard Street and Thurston Road will take on more importance as new low car-parking schemes encourage walking and cycling and the quality and width of the footways require improvement; and
- 8 The site is situated within Flood Zone 3a High Probability. Developers will be expected to work closely with the Environment Agency to ensure that appropriate flood mitigation measures are incorporated.

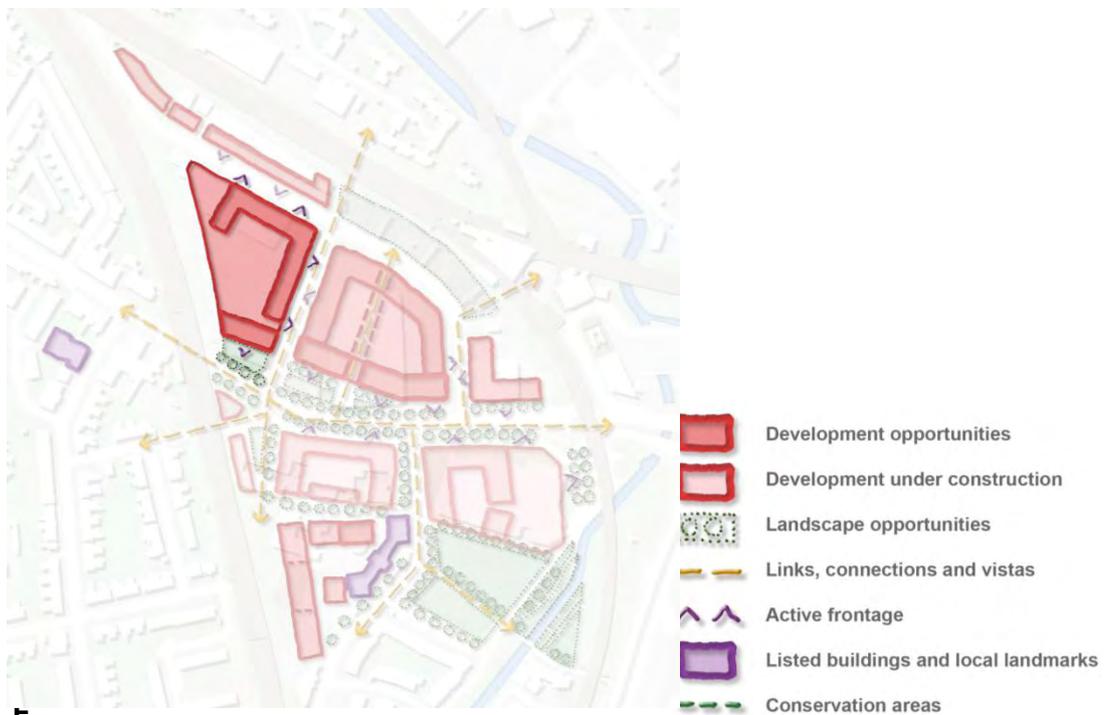


Figure 13: Loampit Vale North – west of Jerrard Street

SITE SPECIFIC POLICY 2.2: Loampit Vale North – west of Jerrard Street
[Amended version of preferred option draft policy LTC OPP4e]

The Thurston Industrial Estate is allocated for mixed use town centre development. The Council will encourage development of this prominent and important site.

Proposals should incorporate the following principles:

- 1 Create an active building frontage to Loampit Vale and Jerrard Street of a scale appropriate to this town centre location. New development should

prepare the visitor for the scale of the development they will encounter in the Lewisham Gateway to the west;

- 2 Ground and possibly first floor uses should ideally be retail, business and community spaces with flatted accommodation above, taking account of the southerly aspect available and the amenity provided by the new publicly accessible open space being created to the south of Loampit Vale;
- 3 The use and design of any new building needs to take account of the impact of shadows cast from buildings on the south side of Loampit Vale on this site and the microclimatic impact of any proposals on Thurston Road;
- 4 Support the improvement of the public realm adjoining the railway line and facing the Thurston Road Industrial Estate, in order to enhance amenity for residents on surrounding development sites;
- 5 Enhancement of public realm on Thurston Road;
- 6 Creation of generous tree lined pavements with a coordinated approach to public realm material treatment (width of 6-8m);
- 7 Jerrard Street and Thurston Road will take on more importance as new low car-parking schemes encourage walking and cycling and the quality and width of the footways require improvement; and
- 8 The site is situated within Flood Zone 3a High Probability. Developers will be expected to work closely with the Environment Agency to ensure that appropriate flood mitigation measures are incorporated.



Figure 14: Railway strip

POLICY 2.3: Railway strip

[Amended version of preferred option draft policy LTC OPP4g]

The railway strip site is allocated for a commercial-led mix of uses.

All proposals should incorporate the following principles:

- 1 Proposals for the land north of the existing Thurston Road Industrial Estate should relate to the geographic constraints presented by the narrow plot depth and location adjacent to the Victorian railway viaduct. This land is considered appropriate for commercial or mixed uses.
- 2 Proposals for the land parcels to the west, leading to the Brookmill Road do not contribute positively to townscape quality. The plots in this location are deeper and therefore have greater potential for a mix of uses. Flatted residential accommodation might be appropriate if the environmental issues associated with this location are satisfactorily mitigated.
- 3 Any proposals should seek to enhance the quality of the pedestrian environment to enhance the arrival experience for pedestrians travelling to

and from the town centre from the northwest. This highlights the need for active, non-residential uses at groundfloor.

- 4 The site is situated within Flood Zone 3a High Probability. Developers will be expected to work closely with the Environment Agency to ensure that appropriate flood mitigation measures are incorporated.
- 5 Any proposal or residential development on the site must overcome any environmental issues and the constraints of the site to provide a high quality of accommodation and amenity

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** The principle of the designation of the Loampit Vale area as an sub-area was supported. There was no clear preferred option for the specific sites.
- **Planning policies:** The draft policies conform with national guidance and play a key role in realising strategic land use objectives in the emerging Core Strategy and the London Plan.
- **Wider policies:** The preferred option conforms to the Sustainable Community Strategy.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

The area-wide policy has been updated to reflect the recent flood risk assessment work and the energy strategy recommendations study. The scope of the site-specific policies has been updated to reflect progress in the implementation of key sites including the mixed use leisure scheme south of Loampit Vale.

4.4 Conington Road character area

Please consider the key consultation questions set out in section 1.3 in relation to each of the draft policy options set out in this section. In particular, we would ask you to regard the following matters:

- Are there any additional issues regarding the Conington Road character area or the sites within the area needing consideration in the AAP?
- Do you have any comments on the recommended or alternative options put forward?
- Do you have any comments on the removed policy options?
- Do you support the recommended options for inclusion in the AAP?
- Are there any other alternative feasible policy options?
- Do you have any other comments?

Setting the scene for the preferred option

Conington Road is immediately to the north of Lewisham transport interchange and the planned Lewisham Gateway development. The area is dominated by a somewhat outdated but popular Tesco store and an associated fragmented series of surface car parks. This is a highly sustainable location with very good levels of public transport accessibility. The River Ravensbourne runs through the area in a concrete channel.

There are two sites that have been granted planning consent for redevelopment since the 2007 Preferred Options Report:

- 72 - 78 Conington Road – Where a part eight/part 10 storey building containing 270 homes and a limited amount of commercial floorspace has recently been built.
- The adjacent Venson site on Conington Road – separated from the above site by Silk Mills Path, a pedestrian right of way, 130 homes in buildings rising to a maximum of 8 storeys, again with some limited commercial uses on the ground floor. This is currently under construction.

In addition, Tescos are known to be keen to expand their store and improve the range of goods and services offered. The Preferred Options report highlighted a range of land use and design options which formed the basis of a composite preferred option incorporating the retention of employment uses, expansion of retail floorspace and introduction of residential uses.

The principal aims and opportunities for the character area relate to the opportunity for it to become more established as a sustainable urban neighbourhood to the north of the town centre focussed around the north south axis of Conington Road, Silk Mills Path and the River Ravensbourne. At the heart of this opportunity is the potential future development of the Tesco car park sites in conjunction with both the expansion of the store and retention of similar levels of car parking provision, retaining the ability of shoppers to park and make use of other shops and services in the town centre. There is an identified need for more convenience retail floor space in this part of the borough and therefore this expansion would assist in meeting that need.

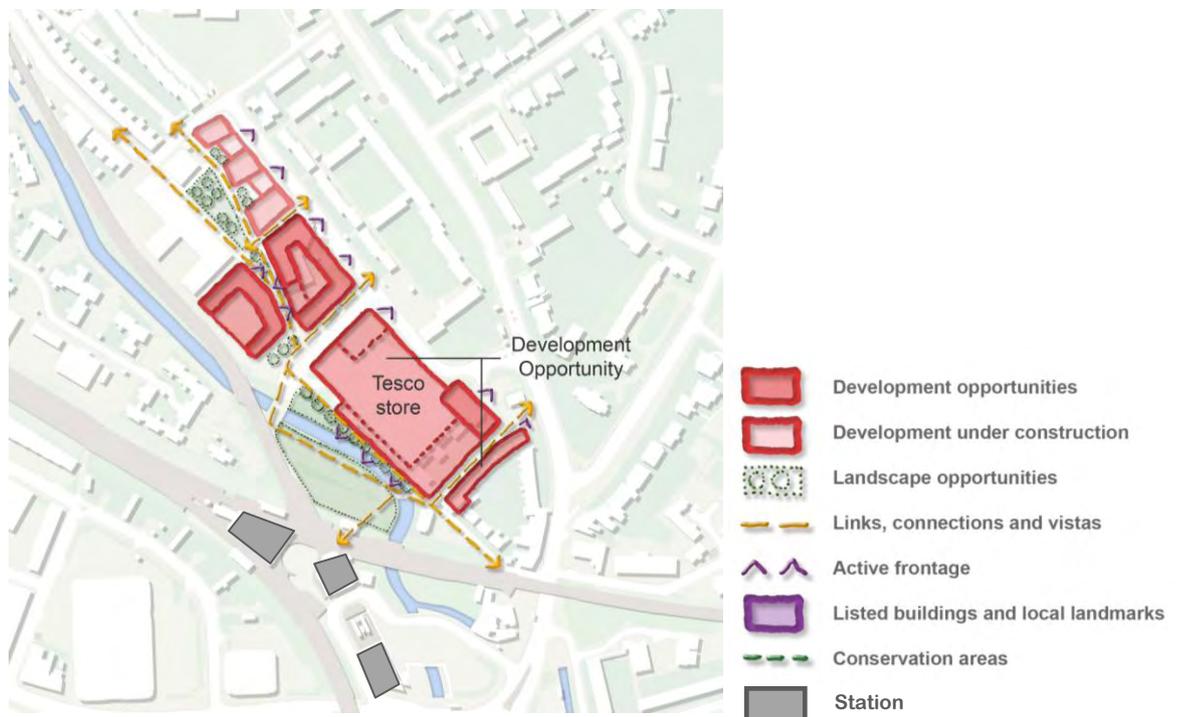


Figure 15: Conington Road character area

**CHARACTER AREA POLICY 3: Conington Road character area
[Amended version of preferred option draft policy LTC OPP5]**

The Conington Road character area provides the opportunity for the establishment of a new and compact town centre neighbourhood with improved links to the station interchange, Lewisham Gateway and the core town centre beyond. The area has considerable capacity for urban growth and radical improvements in townscape quality together with an expanded Tesco store.

Development opportunities in the Conington Road area have the following indicative capacity:

- 400 homes; and
- 3,000 sqm net retail.

New development should address the key routes of Conington Road, Silk Mills Path and the River Ravensbourne. Key priorities for the area are as follows:

- 1 To improve and create accessible pedestrian and cycle routes across the area to the Gateway site, Lewisham Station and the River Ravensbourne.
- 2 To enhance the ecological quality of river environment and ensure the river corridor is also improved to form a valuable public amenity, potentially as a riverside walk.
- 3 To support appropriate expansion of the Tesco store for additional convenience retail floorspace, so long as it does not prejudice the wider objectives for the Character Area as a whole.
- 4 To ensure the most sustainable use is made of the land available to support the further establishment of a new high quality residential neighbourhood in this sustainable location.
- 5 The scale and grain of existing historic fabric at the southern end of this area, its mix of uses and townscape character, are important assets of the town and should be retained and enhanced.

In addition to affordable housing, the priorities for site-specific developers contributions associated with new development proposals in this character area are:

- a. Public realm improvements
- b. Naturalisation and improvements to the ecological quality of the river
- c. Provision of the publicly accessible pedestrian and cycle routes
- d. Improved access to Lewisham Station.
- e. Public access to non-residential car parking
- f. Promotion of long-term decentralised energy options (either by direct provision or by safeguarding opportunities)

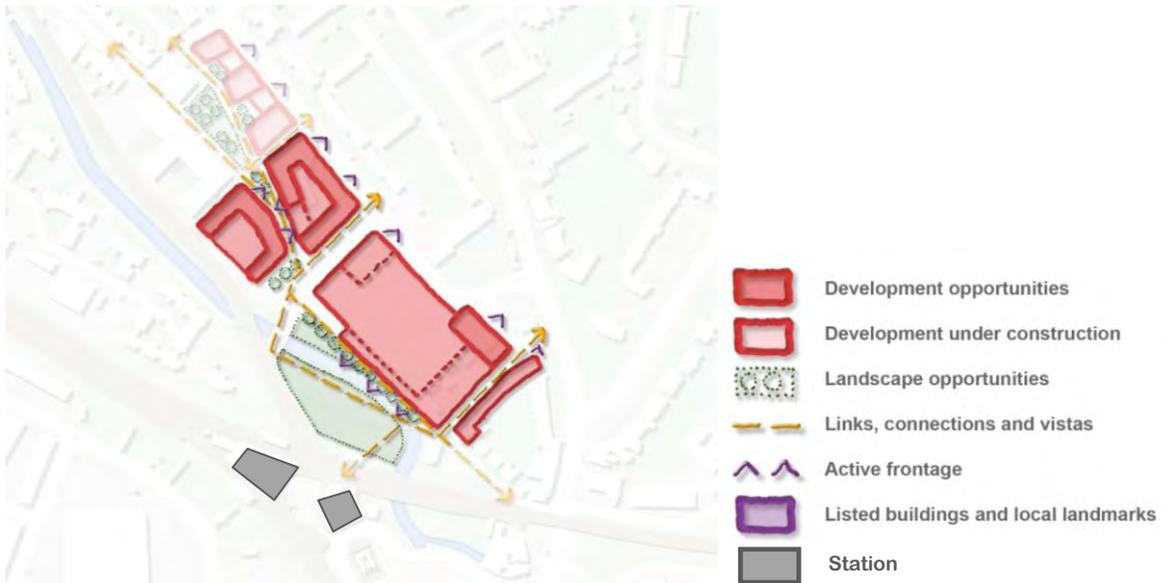


Figure 16: Tesco block and car park

SPECIFIC POLICY 3.1: Tesco block and car park land
[Amended version of preferred option draft policy LTC OPP5 and LTC OPP5c]

The Tesco site and its car parks are allocated for mixed use development including an overall increase in the amount of convenience floorspace in line with identified capacity.

- 1 Access to the river, both visual and physical, from Conington Road should be improved.
- 2 Establishment of a new direct and publicly accessible pedestrian and cycle route linking Lewisham Road to the existing footbridge across the river, enabling new links to Lewisham Station and Gateway site.
- 3 Redevelopment/refurbishment of this site provides a valuable opportunity to improve the quality of frontages to Lewisham Road and the southern end of Silk Mills Path, which are currently poorly addressed by the existing development.
- 4 Parking could be provided beneath a redeveloped car park site, utilising the change in levels across the site. A multi storey parking structure on the island site adjacent to the railway line may help release other surface car park sites and ensure new parking spaces are closer to the store and may

be acceptable if of outstanding design and does not prejudice the creation of a secondary access to Lewisham Station.

- 5 Significant residential development could be accommodated on the existing surface car park site either side of and directly addressing Silk Mills Path and Conington Road.
- 6 The location of the existing Petrol Filling Station constrains the extent to which this highly accessible site can be transformed into a genuine urban mixed use quarter. The disparate urban form and highly trafficked nature of the filling station does not match the objective of enhancing the Silk Mills Path connection. In this context, the Council will seek to work closely with the developer to mitigate the impact of any filling station, ideally through its relocation off-site.
- 7 Proposals should seek to maintain the security and privacy of the existing properties south of Silk Mills Path.

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** Tesco confirmed their intention of expanding their retail offer alongside a wider mix of uses to regenerate the site.
- **Planning policies:** The preferred option conforms to national planning guidance, the London Plan and the emerging Core Strategy
- **Wider policies:** The preferred option is in conformity with the Sustainable Community Strategy.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

The Conington Road area continues to be a key priority for Lewisham Town Centre. The northern part of the site has already come forward, but major opportunities still exist for the development of much needed housing in a way that helps stitch the area into the core of the town centre. The proposed policy has been updated to reflect recent engagement with Tesco.

4.5 Lee High Road character area

Please consider the key consultation questions set out in section 1.3 in relation to each of the draft policy options set out in this section. In particular, we would ask you to regard the following matters:

- Are there any additional issues regarding the Lee High Road character area or the sites within the area needing consideration in the AAP?
- Do you have any comments on the recommended or alternative options put forward?
- Do you have any comments on the removed policy options?
- Do you support the recommended options for inclusion in the AAP?
- Are there any other alternative feasible policy options?
- Do you have any other comments?

Setting the scene for the preferred option

Lee High Road provides the principal approach to Lewisham Town Centre from the east. The road forms part of the A20 and is managed by TfL. The character area encompasses Lee High Road to its junction with Eastdown Park, along with the Albion Way car park and Marischal Road shopping parade. 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 commercial uses, typically with several floors above.

The former Hartwell Ford car dealership site has remained vacant for some time. However, since the 2007 Preferred Options Report was published, planning permission has been granted on appeal for a new food store with housing above. This scheme is currently under construction.

The Preferred Options report identifies a series of site-based development options which were taken forward as a composite preferred option.

The principal aims and opportunities for the character area relate to the importance of respecting the strong traditional high street character of the area which is one of its key strengths and embracing the opportunity to respond positively to the River Quaggy. The Lee High Road area plays a complementary and secondary role to the commercial core of Lewisham with a good selection of specialist retailers in retail units typically smaller than those found on Lewisham High Street



Figure 17: Lee High Road character area

CHARACTER AREA POLICY 4: Lee High Road character area [Amended version of preferred option draft policy LTC OPP3]

Development opportunities in the Lee High Road Character area have the following indicative capacity:

- 110 homes; and
- 2,000sqm net retail

The Council has identified the following key principles for sites within the Lee High Road character area:

- 1 Protect and enhance the traditional high street character of Lee High Road;
- 2 Protect and enhance the biodiversity along the River Quaggy and its immediate environment and, where possible, improve visual and physical access to the river corridor in consultation with the Environment Agency and other relevant stakeholders;

- 3 Protect and enhance amenities of existing residents from and through new development; and
- 4 Improve the environmental quality of the area,

In addition to affordable housing, the priorities for site-specific developers contributions associated with new development proposals in this character area are:

- a. Improvements to the channel and environs of the River Quaggy;
- b. Environmental improvements to Albion Road car park; and
- c. Physical/public realm Improvements to Lee High Road.

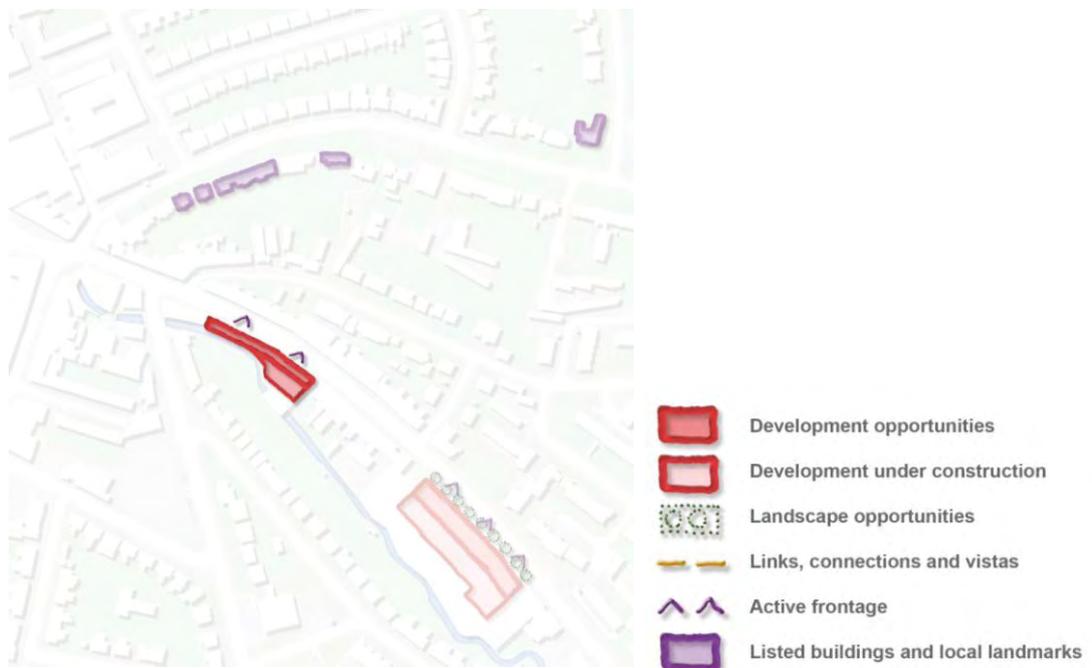


Figure 18: Lee High Road western end

SITE SPECIFIC POLICY 4.1: Lee High Road western end [Amended version of preferred option draft policy LTC OPP3a]

The Council will encourage development to contribute to the realisation of the following principles:

- 1 Protect and enhance the retail character of the area with respect to its focus for small independent retailers and evening economy uses;
- 2 Improve pedestrian and retail environment by pavement widening, improving formal crossing opportunities, tree planting and opening up better links to the River Quaggy;
- 3 Provide a high design quality to new and replacement shopfronts;

- 4 Redevelopment of the single storey shops to include small retail or food and drink units on the ground floor and residential or office uses above taking advantage where possible of opportunities to provide glimpse views of the river channel;
- 5 Heights of new development should respect and reflect the heights of surrounding development; and
- 6 Reinforce the positive relationship between the small stretches of cobbled street on the northern side of Lee High Road, including the western end of Marischal Road, to the busier Lee High Road.
- 7 The site is situated within Flood Zone 3a High Probability. Developers will be expected to work closely with the Environment Agency to ensure that appropriate flood mitigation measures are incorporated.

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** The designation of Lee High Road as an sub-area was supported.
- **Planning policies:** The preferred option conforms to national planning guidance, the London Plan and the emerging Core Strategy
- **Wider policies:** The preferred option conforms to the Sustainable Community Strategy.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

Following commencement of construction on the former Hartwell Ford site, the policy for the eastern end of the site has been removed. The Clarendon Green policy statement has also been deleted in response to the deletion of the Engate Street multi-storey car park proposals and the revision of the town centre parking strategy. Scope still exists for the enhancement of the western end of Lee High Road and this policy statement has therefore been retained.

4.6 Ladywell Road character area

Please consider the key consultation questions set out in section 1.3 in relation to each of the draft policy options set out in this section. In particular, we would ask you to regard the following matters:

- Are there any additional issues regarding the Ladywell Road character area or the sites within the area needing consideration in the AAP?
- Do you have any comments on the recommended or alternative options put forward?
- Do you have any comments on the removed policy options?
- Do you support the recommended options for inclusion in the AAP?
- Are there any other alternative feasible policy options?
- Do you have any other comments?

Setting the scene for the preferred option

The 'Lady Well' was a six foot deep well on a site close to Ladywell Bridge dedicated to the Virgin Mary which gave its name to this small settlement south of Lewisham. Indeed, Ladywell itself is thought to have been the birthplace of Lewisham town. Ladywell Road forms part of the local road network providing an important connection between Lewisham and Brockley. The south side of Ladywell Road hosts a collection of beautiful historic buildings including the Playtower (former Baths) which is on the Listed Buildings at Risk register. The Council is supporting efforts to bring new life to the building which may see it refurbished by a local community trust and brought back into community use. These historic buildings all fall within the St Mary's Conservation Area, taking its name from the ancient church which anchors this community hub.

The area is characterised by a historical concentration of civic and community facilities which, in addition to the church, includes the current and former fire station buildings, the soon to be replaced Ladywell leisure centre, the mortuary and coroner's court building and the former Vicarage of St. Marys building, which in dating back to the late 18th century is one of the Borough's oldest buildings.

Notwithstanding the Ladywell Road character area being located within the Lewisham Core Strategy 'Regeneration and Growth Area', it has a different nature to much of the town centre. The Council has undertaken a conservation area management plan for sections of the character area 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.

Parts of the Ladywell character area, including the leisure centre site, form part of Lewisham's Low Carbon Zone. Lewisham is working in partnership with the Mayor of London, GLA and a range of public, private and community sector groups to deliver a reduction in CO2 emissions of 20% by 2012 and a 60% reduction by 2025

Options

The Lewisham Town Centre AAP will allocate the Ladywell Leisure Centre site for redevelopment. This site was not identified as a potential site allocation in the Preferred Options report of 2007 and therefore a range of options are considered through this Further Options report. The site will only be able to be redeveloped when the new replacement leisure centre on Loampit Vale is operational. There are a number of policy options to consider:

Options	Description	Issues
1. Food supermarket with residential uses above	Capacity for supermarket of approximately 2,800sqm net. Two or three floors of residential above. Parking would either be in basement or undercroft with a raised store. Principal customer entrance would be on Lewisham High Street.	Access to car parking would be a major issue. Use would generate considerable number of new trips which would need to be managed. Access to the car park would need to come off Longbridge Way for which at present there is no right turn into from Lewisham High Street (a TfL red route). Also, in terms of retail capacity, given that the AAP will be promoting expansion of food retail at Conington Road, this could be overprovision.
2. Redevelopment of the site for a mix of uses including retail and residential uses	The retail development would address Lewisham High Street with residential development above the shops and on the land to the rear. Given the edge of centre location of the site, food retail is considered likely to be more viable use. However, small units or a single unit of approximately 1,000 to 1,400sqm net in total is unlikely to be attractive to major retailers. Residential could be a mix of dwelling houses and flats or a denser scheme with a greater proportion of flatted accommodation.	The preferred option is to promote suitable town centre uses on this accessible site at a scale and format which is unlikely to give rise to significant traffic movements or prejudice the expansion of food retailing on more centrally located sites. It is a key opportunity to help support the vitality and viability of the southern part of the town centre. The preferred option promotes retail and residential uses but seeks to retain some flexibility as more detailed design and feasibility work is required.

Options	Description	Issues
3. Gypsy and Travellers site	Whilst planning permission was granted for the use of the nearby former Watergate School site for accommodation for gypsies and travellers, this permission was never implemented.	<p>Core Strategy Policy 2 deals specifically with identifying sites for gypsies and travellers and confirms that the Council continues to monitor their specific needs and will identify a site through the Site Allocations DPD.</p> <p>This site satisfies the selection criteria used by the Council in its search for a Gypsy and Traveller site to meet the anticipated requirements of the Draft Replacement London Plan and is one of seven shortlisted sites in the borough.</p> <p>Further consultation on shortlisted sites is expected in April-May 2011 and if considered appropriate, part of the Ladywell Leisure Centre site could be allocated for such a use through the AAP.</p>

Consultation

The Council received a number of responses relating to the closure of Ladywell Leisure Centre during the Preferred Options consultation.

Preferred option

The preferred option is to promote suitable town centre uses on this accessible site. It is a key opportunity to help support the vitality and viability of the southern part of the town centre. The preferred option promotes retail and residential uses but seeks to retain some flexibility as more detailed design and feasibility work is required.



Figure 19: Ladywell Road character area

Draft policies

CHARACTER AREA POLICY 5: Ladywell Road character area [NEW POLICY]

Development opportunities in the Ladywell Road Character area have the following indicative capacity:

- 150 homes; and
- 1,400sqm net retail (focused on the Ladywell Leisure Centre site)

The Council has identified the following key principles within the Ladywell Road character area:

- 1 Conserve and enhance the heritage assets in the area through sensitive development and environmental improvement.
- 2 Support efforts to bring the Ladywell Baths (Playtower) site back into use

so the building can once again play a key role in community life.

- 3 Promote the Ladywell Leisure Centre site for redevelopment for an appropriate mix of uses including retail and residential.
- 4 Promote development that contributes to the Lewisham Low Carbon Zone target to reduce CO2 emissions of 20% by 2012 and a 60% reduction by 2025

In addition to affordable housing, the priorities for site-specific developers contributions associated with new development proposals in this character area are:

- a. Investing in the Waterlink Way initiative.
- b. Ensuring the heritage assets contribute positively to community life.
- c. Highway improvements particularly by the Ladywell Leisure Centre site.
- d. Support delivery of the Low Carbon Zone CO2 reduction targets
- e. Public access to non-residential car parking



Figure 20: Ladywell Leisure Centre site

SITE SPECIFIC POLICY 5.1: Ladywell Leisure Centre site [NEW POLICY]

The Council will seek to bring forward a comprehensive development of this site and adjoining land where appropriate for a mix of uses including retail (A1-A3) and housing (C3).

The following key principles will apply:

- 1 New development should seek to improve vehicular servicing of adjoining land to the south.
- 2 Proposals could include the redevelopment of Lewisham Free School, subject to the allowance being made for alternative provision of equivalent benefit to the community (see LTC COM3).
- 3 Proposals should seek to enhance the Lewisham High Street frontage through the incorporation of active uses at groundfloor and enhancements to the public realm in front of the site and enhancements to permeability through the site. Residential units should be situated at upper levels and to the rear of the site with associated amenity space provision.
- 4 Opportunities to establish a site-specific communal energy system with potential to link into a larger Lewisham Hospital decentralised energy system in the longer term will be encouraged.

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** As a new sub-area, there has not been previous consultation regarding the Leisure Centre site as a development site.
- **Planning policies:** The preferred option conforms to national planning guidance, the London Plan and the emerging Core Strategy .
- **Wider policies:** The preferred option conforms to the Sustainable Community Strategy
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

4.7 Central character area

Please consider the key consultation questions set out in section 1.3 in relation to each of the draft policy options set out in this section. In particular, we would ask you to regard the following matters:

- Are there any additional issues regarding the Central character area or the sites within the area needing consideration in the AAP?
- Do you have any comments on the recommended or alternative options put forward?
- Do you have any comments on the removed policy options?
- Do you support the recommended options for inclusion in the AAP?
- Are there any other alternative feasible policy options?
- Do you have any other comments?

Setting the scene for the preferred option

Lewisham Central Character Area is dominated by Lewisham Shopping Centre which is owned and managed by Land Securities. The shopping centre contains a very significant proportion of the total retail floorspace in the town centre. The centre also has an 800 space pay and display car park.

Within this Character Area there are a number of additional sites. At the northern end of the centre there is a small site occupied by independent traders. The site is beyond the control of the shopping centre owners. Similarly, there is a collection of relatively small sites at the southern end of the shopping centre. Whilst Land Securities have acquired the Model Market site, the former Beatties buildings

beyond remains beyond their control.

Engate Street is a short street connected to the southern end of Molesworth Street. It is home to some established employment uses and was put forward in the Preferred Options report of 2007 as a potential site for the development of a multi-storey car park. This suggestion attracted objection from existing businesses along Engage Street and the GLA on the grounds of loss of employment floorspace.

Taking account of objections made to the Preferred Options Report, Engate Street is not identified as an allocated site although proposals would be welcome for more intensive employment uses on this well positioned site.

The Preferred Options report identified three main options for the shopping centre ranging from support for the existing function of the centre to comprehensive redevelopment or development of land to the south of the centre to create a new southern anchor. The preferred option was a composite of all three options.



Figure 21: Central area character area

CHARACTER AREA POLICY 6: Central area character area [Amended version of preferred option draft policy LTC OPP2 and LTC OPP6]

Development opportunities in the Central Character Area have the following indicative capacity:

- 200 homes; and
- 600sqm net retail

The Council has identified the following key principles within the Central area character area:

- 1 As the centre is managed, refurbished and redeveloped over time, ensure every opportunity is taken to improve the number and nature of the east-west connections across the shopping centre area;
- 2 Create a new southern anchor for Lewisham High Street to encourage customers to travel the full length of the High Street;
- 3 Create a more coherent and pleasant environment which meets the needs of both pedestrians and vehicles, including possibly replacing the current

roundabout arrangement with a signified junction (subject to satisfactory traffic modelling and design development) and maintaining and where possible enhancing the existing Shopmobility scheme;

- 4 Achieve a welcoming and accessible gateway to the centre at the northern (interface with Lewisham Gateway) and southern entrances to the centre through high quality architecture and urban design;
- 5 Secure investment in the Waterlink Way concept along the alignment of the River Ravensbourne;
- 6 Create an active frontage to Molesworth Street; and
- 7 Working in partnership with market traders, achieve environmental improvements to Lewisham High Street and market area.

In addition to affordable housing, the priorities for site-specific developers contributions associated with new development proposals in this character area are:

- a. Secure contributions to investment in the Waterlink Way initiative;
- b. Secure long term improvements to the Lewisham street market; and
- c. Secure environmental improvements to the pedestrianised areas of Lewisham High Street and the Molesworth Street corridor including improved pedestrian crossings and landscaping measures.
- d. Promotion of long-term decentralised energy options (either by direct provision or by safeguarding opportunities)

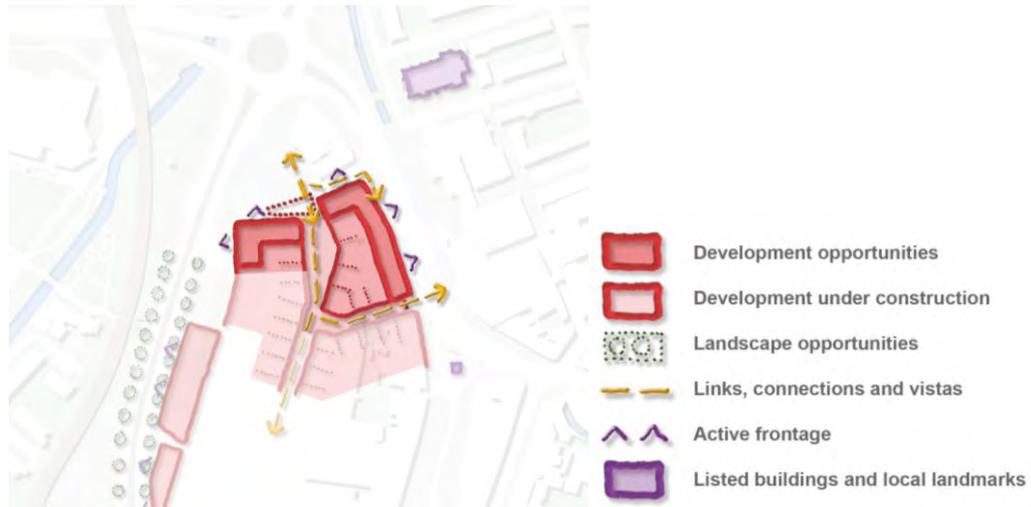


Figure 22: Land north east of the shopping centre

**SITE SPECIFIC POLICY 6.1: Land north east of the shopping centre
[Amended version of preferred option draft policy LTC OPP2g]**

The Council will encourage redevelopment of the corner site north east of the shopping centre in conjunction with more comprehensive improvements to the Lewisham Centre to provide retail (A1-A3) and/or leisure use (D2) on the ground floor with commercial and/or residential (C3) on the upper floors. Such redevelopment should take account of the following principles:

- 1 Redevelopment should respond positively to the Lewisham Gateway development and tall buildings may be considered appropriate subject to Core Strategy Policy 18;
- 2 Forming the northern end of the core shopping area, any redevelopment should seek to retain commercial uses at ground floor level on Lewisham High Street;
- 3 Active frontages should be provided at ground floor level to Lewisham High Street, the new connection road between Lewisham High Street and Molesworth Street and the new entrance mall to the shopping centre; and
- 4 New residential development should not require new dedicated car parking spaces, making wheelchair accessible housing here inappropriate.
- 5 The site is situated within Flood Zone 3a High Probability. Developers will be expected to work closely with the Environment Agency to ensure that appropriate flood mitigation measures are incorporated.



Figure 23: Land south of the shopping centre

**SITE SPECIFIC POLICY 6.2: Land south of the shopping centre
[Amended version of preferred option draft policy LTC OPP2f]**

The Council will encourage the comprehensive redevelopment of the Beatties Buildings and Model Market sites to provide retail or leisure uses on the ground floor with commercial and/or residential uses on the upper floors. Such redevelopment should take account of the following principles:

- 1 Redevelopment should mark the beginning of the commercial and retail heart of Lewisham town centre and may take the form of an extension to the shopping centre.
- 2 Buildings should make best use of the corner site and provide enclosure and active frontage to both Molesworth Street and Lewisham High Street as positive public spaces.
- 3 New residential development should not require new dedicated car parking spaces making wheelchair accessible housing here inappropriate.
- 4 The site is situated within Flood Zone 3a High Probability. Developers will be expected to work closely with the Environment Agency to ensure that appropriate flood mitigation measures are incorporated.

**SITE SPECIFIC POLICY 6.3: Citibank Tower
[Retention of preferred option draft policy LTC OPP2i]**

Citibank Tower is an important landmark for Lewisham and an anchor for commercial life; however its appearance does not fulfil its potential in this respect. Proposals which include the recladding or redevelopment of the tower will be encouraged in order to enhance the character and identity of Molesworth Street and the wider town centre. More intensive office use or residential conversion would be favourably considered by the Council.

Reasons for selection of preferred option

This preferred option was selected for the following reasons:

- **Consultation:** Consultees supported the principle of establishing the Centre as an Opportunity Area but did not identify a preferred option.
- **Planning policies:** The preferred option conforms to national planning guidance, the London Plan and the emerging Core Strategy.
- **Wider policies:** The preferred option conforms to the Sustainable Community Strategy.
- **Sustainability Appraisal and Strategic Environmental Assessment:** The identification of the preferred option has been tested through the Sustainability Appraisal/SEA.

Justification of policy retention and amendments

The decision not to pursue proposals for a multi-storey car park on the Engate Street site (for the reasons outlined above and in relation to the area-wide Policy LTC TRS2) means that the existing public car park on the west side of Molesworth Street is more important and the Molesworth Street site is no longer identified for development.

4.8 Policies which have been deleted

The following policies have been identified for removal from the emerging AAP. Appendix 3 details the rationale for this and identifies the documents that include relevant policies that satisfactorily address Lewisham Town Centre issues.

Please consider the key consultation questions set out in section 1.3 in relation to each of the removed policy options set out in section 4.8. In particular, we would ask you to regard the following matters:

- Do you have any comments on the removed policy options (See Appendix 3 for detail of removed policies)?
- Do you have any other comments?

The following policies have been identified for removal from the emerging AAP. Appendix 3 details the rationale for this and where relevant identifies where alternative policies exist.

LTC OPP0	OPPORTUNITY AREA POLICIES
LTC OPP1	LEWISHAM GATEWAY OPPORTUNITY AREA
LTC OPP1A	GENERAL PRINCIPLES FOR LEWISHAM GATEWAY
LTC OPP2A	ENTRANCE AND ROUTES
LTC OPP2B	URBAN FORM
LTC OPP2C	PUBLIC REALM
LTC OPP2D	VEHICULAR SERVICING AND PARKING
LTC OPP2E	MOLESWORTH STREET FRONTAGE
LTC OPP2H	MOLESWORTH STREET SURFACE CAR PARK SITE
LTC OPP2J	LEWISHAM HIGH STREET AND MARKET
LTC OPP3B	LEE HIGH ROAD EASTERN END
LTC OPP3C	CLARENDON GREEN
LTC OPP4A	LOAMPIT VALE SOUTH – A MIXED USE URBAN STREET
LTC OPP4B	EAST SIDE OF ELMIRA STREET
LTC OPP4C	WEST OF ELMIRA STREET
LTC OPP4D	THURSTON ROAD OPPORTUNITY
LTC OPP4F	LAND EAST OF JERRARD STREET
LTC OPP5A	NORTHERN LINK
LTC OPP5C	CAR PARK AND PETROL STATION
LTC OPP6	ENGATE STREET
LTC OPP6A	ENGATE STREET MIXED USE BLOCK

Appendix 1

Glossary of terms

Affordable Housing includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. Affordable housing should:

- meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices
- include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision (Annex B PPS3).

Annual Monitoring Report A report submitted to the Government by local authorities or regional planning bodies assessing progress with and the effectiveness of a Local Development Framework.

Area Action Plan (AAP) A type of Development Plan Document focused on a specific location of an area subject to conservation or major change (for example major regeneration).

Biodiversity Biodiversity is the variety of life, which includes mammals, birds, fish, reptiles, amphibians, invertebrates, fungi and plants and the woodlands, grasslands, rivers and seas on which they all depend including the underlying geology.

Code for Sustainable Homes A national standard for sustainable design and construction of new homes which became mandatory on 1 May 2008. The Code measures the sustainability of a new home against categories of sustainable design using a 1 to 6 rating system to communicate the overall sustainability performance of a new home. The Code sets minimum standards for energy and water use at each level. Go to www.communities.gov.uk/thecode to find out more.

Comparison Retailing The provision of items not obtained frequently. These include clothing, footwear, household and recreational goods.

Conservation Area Areas of special architectural or historic interest designated by local authorities under the Planning (Listed Building and Conservation Areas) Act 1990.

Contribution Land, services, facilities and/or money given by developers of land to the local authority following negotiations, to ensure that the needs of new communities generated by the development are catered for.

Convenience Retailing Convenience retailing is the provision of everyday items, including food, drinks, newspapers/magazines and confectionery.

Core Strategy A Development Plan Document setting out the spatial vision and strategic objectives of the planning framework for the area, in line with the Sustainable Community Strategy.

Creative Industries Creative industries has been defined by the Department for Culture, Media and Sport as 'Those industries that are based on individual creativity, skill and talent. They are also those that have the potential to create wealth and jobs through developing intellectual property. The creative industries include: Advertising, Film and video, Architecture, Music, Art and antiques, Performing arts, Computer and video games, Publishing, Crafts, Software Design, Television and radio, Designer fashion .

Department for Communities and Local Government (DCLG) The government department responsible for setting UK policy on local government, housing, urban regeneration, planning and fire and rescue.

Development 'The carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material changes in the use of any building or other land' (Town and Country Planning Act (1990) Part III Section 55).

Development Plan Document (DPD) A Local Development Document that has been subject to independent testing and has the weight of development plan status. Replaces the Local Plans system.

Equalities Impact Assessment (EQIA) Equality Impact Assessments are concerned with anticipating and identifying the equality consequences of particular policy initiatives and service delivery and ensuring that, as far as possible, any negative consequences for a particular group or sector of the community are eliminated, minimised or counterbalanced by other measures.

Evidence Base The data and information about the current state of Lewisham used to inform the preparation of Local Development Framework documents.

Flood Risk Assessment An assessment of the likelihood of flooding in a particular area (usually a specific site) so that development needs and mitigation measures can be carefully considered.

Government Office for London (GOL) The integrated Government Regional Office for London, with the following directorates: Education, Industry and Trade, Environment and Transport, and Strategy and Resources.

Gypsy and Traveller Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling show people or circus people or circus people travelling together as such (Circular 01/2006).

Housing Need A level of socially desirable housing, the demand for which is not reflected in the open market, normally due to a lack of income in relation to prevailing house prices or rents. It can therefore usually only be met through an element of subsidy.

Independent Examination The process by which a planning inspector may publicly examine a Development Plan Document or a Statement of Community Involvement, before issuing a binding report. The findings set out in the report are binding on the local authority.

Infill Development Development that takes place between existing groups of buildings, normally within a built-up area.

Infrastructure The utilities, transport and other communication facilities and community facilities required to support housing, industrial and commercial activity, schools, shopping centres and other community and public transport services.

Intermediate Affordable Housing Subsidised housing that costs less than housing available for sale or rent in the open market (whichever is the lower) but more than housing for social rent. It includes part-buy part-rent homes and housing for rent or sale at a discount.

Issues and Options and Preferred Options The 'pre-submission' consultation stages on Development Plan Documents with the objective of gaining public consensus on proposals ahead of submission to Government for independent examination.

Listed Building Buildings of special architectural or historic interest designated by the Department of Culture, Media and Sport under the Planning (Listed Building and Conservation Areas) Act 1990.

Local Development Document (LDD) Sits within the LDF portfolio and comprise Development Plan Documents (DPDs) that have been subject to independent testing and have the weight of development plan status and Supplementary Planning Documents (SPDs) which are not subject to independent testing and do not have development plan status.

Local Development Framework (LDF) The Local Development Framework is a portfolio, or a 'folder', of Local Development Documents which will provide the local planning authority's policies for meeting the community's economic, environmental and social aims for the future of their area where this affects the development and use of land.

Local Development Scheme (LDS) A public statement identifying which Local Development Documents will be produced by the Council and when.

Local Employment Location (LEL) Land that is of local significance and provide goods and services for the local economy, which is used for business use, industrial use, storage and distribution uses, generally being those uses falling within Classes B1, B2 and B8 of the Use Class Order.

Local Strategic Partnership A Local Strategic Partnership is a single non-statutory, multi-agency body which matches local authority boundaries and aims to bring together at a local level the different parts of the public, private, community and voluntary sectors.

Masterplan A document which sets out proposals for buildings, spaces, movement strategy and land use in text and three dimensions and matches these proposals to a delivery strategy. The masterplan can be described as a sophisticated 'model' that:

- shows how the streets, squares and open spaces of a neighbourhood are to be connected
- defines the heights, massing and bulk of buildings
- sets out suggested relationships between buildings and public spaces
- determines the distribution of activities/uses that will be allowed
- identifies the network of movement patterns for people moving by foot, cycle, car or public transport, service and refuse vehicles
- sets out the basis for provision of other infrastructure elements such as utilities
- relates physical form to the socio-economic and cultural context and stakeholder interests
- allows an understanding of how well a new, urban neighbourhood is integrated with the surrounding urban context and natural environment.

Planning and Compulsory Purchase Act 2004 National planning legislation from central government aimed at improving the planning process and enhancing community involvement in it. Visit www.communities.gov.uk to find out more.

Planning Policy Statement (PPS)/Planning Policy Guidance (PPG) Planning Policy Statements (PPSs) (and their predecessors Planning Policy Guidance Notes) are prepared by the Government after public consultation to explain statutory provisions and provide guidance to local authorities and others on planning policy and the operation of the planning

system. They also explain the relationship between planning policies and other policies which have an important bearing on issues of development and land use. Local authorities must take their contents into account in preparing plans. The guidance may also be relevant to decisions on individual planning applications and appeals.

Previously Developed Land Land which is or was occupied by a permanent structure (excluding agricultural or forestry buildings), and associated fixed surface infrastructure. The definition covers the curtilage of the development. Previously developed land may occur in both built-up and rural settings. The definition includes defence buildings and land used for mineral extraction and waste disposal where provision for restoration has not been made through development control procedures.

Regeneration The process of putting new life back into often derelict older urban areas through environmental improvements, comprehensive development and transport proposals.

Section 106 (S106) Section 106 of the Town and Country Planning Act 1990 allows a local planning authority (LPA) to enter into a legally binding agreement or planning obligations, with a land developer over a related issue. The obligation is sometimes termed a 'Section 106 agreement'. Such agreements can cover almost any relevant issue and can include sums of money. An example of S106 agreements could be that a developer will build a community meeting place on a development site, or the developer will make a financial contribution for transport improvements.

S106 agreements can act as a main instrument for placing restrictions on developers, often requiring them to minimise the impact on the local community and to carry out tasks which will provide community benefits.

Sequential approach/sequential test A planning principle that seeks to identify, allocate or develop certain types or locations of land before others. For example, brownfield housing sites before greenfield sites, or town centre retail sites before out-of-centre sites.

Social Rented Housing Rented housing owned and managed by local authorities and registered social landlords, for which guideline target rents are determined through the national rent regime. It may also include rented housing owned or managed by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Housing Corporation as a condition of grant (Annex B PPS3).

Spatial Planning Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function. They will include policies which can impact on land use, for example by influencing the demands on, or need for, development, but which are not capable of being delivered solely or mainly through the granting or refusal of planning permission and which may be implemented by other means.

Stakeholder A person, group, company, association, etc. with an economic, professional or community interest in the borough or a specific part of it, or that is affected by local developments.

Statement of Community Involvement (SCI) The Statement of Community Involvement sets out the local planning authority's policy for involving the community in the preparation and revision of Local Development Documents and planning applications.

Strategic Environmental Appraisal (SEA) A generic term used internationally to describe environmental assessment as applied to policies, plans and programmes.

Strategic Flood Risk Assessment (SFRA) An assessment usually undertaken by a local authority at a borough-wide level that considers flood risk, both fluvial and tidal and examines the risks involved for developing certain areas within the borough in accordance with Planning Policy Statement 25.

Strategic Housing Land Availability Assessment (SHLAA) A study aimed at identifying sites with potential for housing, assessing their housing potential and assessing when they are likely to be developed.

Strategic Housing Market Assessment (SHMA) A study aimed at assessing the need and demand for housing within a housing market area.

Sustainability Appraisal (SA) Sustainability Appraisal is a systematic and iterative appraisal process, incorporating the requirements of the European Strategic Environmental Assessment Directive. The purpose of sustainability appraisal is to appraise the social, environmental and economic effects of the strategies and policies in a Local Development Document from the outset of the preparation process.

Sustainable Community Strategy (SCS) The Sustainable Community Strategy has been prepared by Lewisham's Local Strategic Partnership and is a document which sets out how the vision and priorities for Lewisham will be achieved. The Core Strategy is the spatial interpretation of the SCS.

Sustainable Drainage Systems (SUDS) Physical structures designed to receive surface water runoff in order to reduce the negative impact of development on the water environment. They can usually be incorporated into the planted or paved area of the development.

Waste Material is waste if, when disposing of it or having it disposed of on his behalf, the producer intends to discard it or throw it away. Even if the material is reusable, if it is discarded it is still waste. It is the original producer's intention that determines if a material is waste. Waste is generally referred to as being either controlled or uncontrolled. Controlled waste consists of household, commercial and industrial waste and falls within the scope of waste regulation and environmental protection legislation. Uncontrolled waste consists of radioactive waste, explosive waste, mines and quarries waste and agricultural waste and is regulated by other legislation.

Appendix 2

Preferred Options consultation responses

	Organisation	Policy	Comment	Response
1.	Greater London Authority	GENERAL	The draft Development Plan Documents are largely supported. Lewisham town centre AAP is particularly successful at embracing the spatial approach to policy making which underpins the new planning system. A number of strategic issues are raised in the AAPs, particularly the borough wide affordable housing target, and the relaxed approach taken to employment land. It is acknowledged that GLA officers and the Council are in discussions regarding these issues, and it is hoped that a successful resolution can be reached. In addition, concern is raised regarding the need to secure decentralised energy at the town centre level.	The Further Options Report has been informed by the Low Carbon and Decentralised Energy Strategy Recommendations (December 2010) and identify three potential decentralised energy clusters. The Further Options Report includes a preferred option and draft policy on carbon dioxide emission reduction, which encapsulates the findings of the Strategy Recommendations.
2.	Greater London Authority	LTC EMP1	The LDA objects to the relaxed approach to employment land and seeks a more restrictive policy response. The requirement to deliver employment and training initiatives is supported, however this should be expanded to include methods to overcome barriers to work, for example childcare.	Core Strategy Spatial Policy 2 identifies the Molesworth Local Employment Location to help ensure local employment opportunities and this is reflected in the Further Options Report. Earlier proposals to develop parts of Engate Street for non business proposals have been dropped. Proposed Policy LTC EMP1 has been amended to provide further protection to employment uses and childcare provision is addressed in the Social Infrastructure options and draft policy.
3.	Greater London Authority	GENERAL	Overall TfL considers both AAPs to be extremely positive in transport terms. Both AAPs seek to encourage more sustainable forms of transport, particularly walking and cycling. Car parking standards conform with the London Plan and the documents show that joint working exists between the borough and TfL, which is welcomed. The documents would benefit from some minor changes where references could be made to TfL's cycling and walking plans as well as TfL's Best Practice Guidance on Transport Assessments. TfL will continue to work with the borough to assist in delivering the transport improvements necessary to meet the identified development and regeneration needs. TfL expects the borough to maximise car free developments and seek Section 106 contributions to mitigate their impacts upon the public transport network.	Previously proposed Policies LTC TRS1 (Parking Standards) and TRS5 (Travel Plans) have been deleted, in preference to wider ranging policies in the Core Strategy. All the issues raised are addressed in the Core Strategy.
4.	Greater London Authority	GENERAL	Both AAPs need to promote children's play areas within the town centres, particularly in areas of new residential developments, but also in public realm improvements in general.	The need for play space is addressed on a borough-wide basis in the Core Strategy. There are no town centre specific issues that warrant special attention in the AAP.
5.	Greater London Authority	LTC URB6	Neither AAPs is proactive enough in promoting inclusive design of both individual developments and in public realm improvements. When establishing urban design criteria, as both AAPs do, it is vital that the need to ensure equal access for all is included. In addition, neither AAP supports a shopmobility scheme for the town centres. This is a vital facility, which should be secured through development, for example through s.106 agreements.	The need for inclusive design principles to be addressed is raised as a specific issue in the Further Options Report. New Character Area Policy 6 refers to the need to maintain and where possible enhance the existing shopmobility scheme. The design of public realm areas is addressed in the Core Strategy.
6.	Greater London Authority	LTC OS1	Lewisham AAP takes an overly relaxed approach to Metropolitan Open Land, which causes serious strategic concern. Similar concerns were raised previously by the Mayor when considering the Core Strategy and Development Policies Preferred Options.	The previously proposed policy on MOL (LTC OS1) has been deleted in favour of the Borough-wide Core Strategy Policy 12 (Open space and environmental assets).
7.	CABE	LTC URB3	Thank you for consulting the Commission for Architecture and the Built	The Further Options Report takes account of these comments.

	Organisation	Policy	Comment	Response
			Environment (CABE). Unfortunately, due to limited resources, we are unable to comment on this document. However we would like to make some general comments which you should consider. 1.Design is now well established in planning policy at national and regional levels, and LDFs offer an opportunity to secure high-quality development, of the right type, in the right place, at the right time. 2.Robust design policies should be included within all LDF documents and the Community Strategy, embedding design as a priority from strategic frameworks to site-specific scales. 3.To take aspiration to implementation, local planning authorities' officers and members should champion good design. 4.Treat design as a cross-cutting issue - consider how other policy areas relate to urban design, open space management, architectural quality, roads and highways, social infrastructure and the public realm. 5.Design should reflect understanding of local context, character and aspirations. 6.You should include adequate wording or 'hooks' within your policies that enable you to develop and use other design tools and mechanisms, such as design guides, site briefs, and design codes. You might also find the following CABE Guidance helpful. •"Making design policy work: How to deliver good design through your local development framework" •"Protecting Design Quality in Planning" •"Design at a glance: A quick reference wall chart guide to national design policy" These, and other publications, are available from our website www.cabe.org.uk	
8.	Greater London Authority	GENERAL	The Catford AAP explicitly requires that all residential development be built to Lifetime Homes standards, and that 10% be wheelchair accessible, or easily adaptable. Lewisham AAP does not include this requirement. It is acknowledged that the Development Policies DPD includes the requirement for Lifetime Homes and wheelchair homes, in accordance with London Plan Policy, however this differing approach may cause confusion. This issue is also raised with regard to renewable energy and sustainability. The GLA would welcome further discussion with the Council regarding this issue.	The need for accessible housing is raised as a specific issue in the Further Options Report. However, in line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy.
9.	Greater London Authority	LTC EMP1	Lewisham AAP in particular takes a very flexible approach to the loss of employment land. This raises strategic concern. Town centres should include a full range of uses, and not be promoted on a retail offer alone. Poor architectural quality is not considered adequate justification to seek redevelopment of employment land for retail and residential uses. As such, the Council should take a more restrictive approach and seek environmental and streetscape improvements through other means than complete redevelopment.	Core Strategy Spatial Policy 2 identifies a Molesworth Local Employment Location to help ensure local employment opportunities and this is reflected in the Further Options Report. Proposed Policy LTC EMP1 has been amended to provide further protection to employment uses.
10.	Greater London Authority	LTC HSG4	Both AAPs mirror the Development Policies approach to affordable housing, and include a 35% affordable housing target. As stated by the Mayor previously this approach is not supported and is considered not in general conformity. It is acknowledged however that discussions are ongoing between GLA officers and the Council regarding this matter, and it is hoped that a successful conclusion can be met.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG4 (Affordable Housing) has therefore been deleted.

	Organisation	Policy	Comment	Response
11.	GVA Grimley LLP on behalf of Tesco Stores Limited	LTC OPP5	The illustrative ' development framework plan' is overly prescriptive in terms of the layout and urban form of the development blocks. The plan should not prejudice the ability of any future developer to bring forward schemes with alternative layouts that still adhere to best practice urban design principles.	The plan is "indicative" but represents good urban design principles. It is not intended to stifle good design and the Council would welcome positive discussions with developers on key town centre sites.
12.	Greater London Authority	LTC URB2	On balance, the sustainability, and particularly the energy policies, within the Development Policies document are supported. These are repeated in the Catford AAP. However neither AAP address the need to actively promote and secure district heating at the town centre level, led by combined heat and power to serve proposed and existing developments. This is a key component of the draft Further Alterations to the London Plan, as amended by documents submitted to the recent Examination in Public . The AAP documents are the appropriate method with which to establish policy support for this approach. The current documents therefore raise serious strategic concern in this regard and GLA officers would be keen to follow this up in detail with Lewisham Council.	The Further Options Report has been informed by the Low Carbon and Decentralised Energy Strategy Recommendations (December 2010) and identify three potential decentralised energy clusters. The Further Options Report includes a preferred option and draft policy on carbon dioxide emission reduction, which encapsulates the findings of the Strategy Recommendations.
13.	Greater London Authority	GENERAL	Both Area Action Plans (AAPs) are supported in principle. Lewisham Town Centre AAP is a particularly successful response to the new planning systems promotion of spatial planning. The two documents are however very different in style and content, which may create an awkward family of documents when finished. The Catford Town Centre AAP is largely policy based, with detailed policies on housing and sustainability, for example, which in some respects mirrors the Development Policies and Core Strategy policies. However, Lewisham AAP takes a design led approach, and does not include the same policy detail. Both documents are largely successful, but it may be beneficial to introduce some standardisation across the pair.	LBL are currently reviewing the structure of both AAPs to ensure consistency between them and with the emerging Core Strategy
14.	Highways Agency	GENERAL	1.Thank you for inviting the Highways Agency (HA) to comment on Lewisham's Local Development Framework Preferred Options Consultation. 2.The HA, on behalf of the Secretary of State for Transport, is responsible for managing and operating a safe and efficient Strategic Road Network (SRN) (i.e. the Trunk Road and Motorway network) in England as laid down in Department for Transport (DfT) Circular 02/2007 (Planning and the Strategic Road Network). I have attached a link to the new circular for your convenience. http://www.dft.gov.uk/consultations/aboutria/riarevisedcircularplanningandsrn 3.The HA do not wish to comment on the Preferred Options.	Noted.
15.	GVA Grimley LLP on behalf of Tesco Stores Limited	LTC HSG1	We are supportive of the identification of the Connington Road Opportunity Area as a preferred location for residential development. However, we feel that the policy is overly prescriptive in identifying the number of units to be accommodated on-site, as the development capacity of the site is yet to be tested; therefore there does not appear to be any robust justification for the estimated dwelling thresholds presented.	The Further Options Report has been informed by 3D indicative capacity testing and each character area includes and indicative capacity assumption. This is to help deliver the strategic land use targets identified for the Town Centre in the Core Strategy. However, the identified capacity is not a requirement and does not preclude development proposals which deviate from it.

	Organisation	Policy	Comment	Response
16.	GVA Grimley LLP on behalf of Tesco Stores Limited	LTC HSG5	We support the acknowledgement in Policy LTC HSG5 that the degree of housing mix for any given site will be determined by local circumstances and are also encouraged that the Council will be seeking innovative and imaginative solutions to dwelling mix and provision of outdoor amenity space.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG5 (Dwelling Mix) has therefore been deleted.
17.	GVA Grimley LLP on behalf of Tesco Stores Limited	LTC SH1	We are supportive of the identification of the Connington Road Tesco store site as an allocated site on which to develop additional food and non-food retail floorspace.	Noted. This is retained in the Further Options Report.
18.	GVA Grimley LLP on behalf of Tesco Stores Limited	LTC SH8	We feel that through the quality mixed use redevelopment of the Connington Road Opportunity Area there is the opportunity to incorporate evening economy uses that will complement the range of uses included on-site. The site is large enough to accommodate evening economy uses in areas that will not be detrimental to residential amenity. Also, there should be a definition for the term 'evening economy uses', referencing the acceptable land uses, which should include A3, A4, A5 and D2 uses.	It would be more appropriate for a definition of this to be provided as part of the Development Management DPDs. However, 'evening uses' may well be considered appropriate in this location depending on the nature of development proposals brought forward.
19.	GVA Grimley LLP on behalf of Tesco Stores Limited	LTC URB1	Either the policy or supporting text should provide a definition of what is considered to be a 'tall building'.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC URB1 (Tall Buildings in Lewisham Town Centre) has therefore been deleted.
20.	GVA Grimley LLP on behalf of Tesco Stores Limited	LTC TRS2	We are supportive of the Council's preferred option which seeks to broadly maintain existing ratios of parking spaces to retail floorspace through increase in provision in line with expansion in retail floorspace. However, the policy needs to acknowledge that where existing retail is redeveloped and expanded, the proposed car parking standards will apply to the additional increase of retail floorspace.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC TRS1 (Lewisham Town Centre Parking Standards) has therefore been deleted. References to public car parking strategy has changed.
21.	GVA Grimley LLP on behalf of Tesco Stores Limited	LTC OPP5	We are largely supportive of the strategic aspirations for the Conington Road Opportunity Area. However, we feel the policy is too prescriptive in terms of identifying capacity thresholds for the various land uses, which include 1100 dwellings; 6000m2 retail; 200 - 300 car parking spaces; and 3500m2 of public open space. The development capacity on-site has yet to be fully tested and as such there appears to be no detailed justification for how these thresholds have been derived. Site specific detailed technical and design capacity work will be undertaken to identify the site's development potential. In order to maximise the regeneration potential of the site and to ensure that all proposals can be assessed on their individual merits, the policy should only provide a strategic vision for the Connington Road Opportunity Area, setting out the aspirations and key objectives for the area. There should also be recognition that the Connington Road Opportunity Area is in multiple ownerships and therefore the delivery of the development outputs will be brought forward through several independent applications.	The Further Options Report has been informed by 3D indicative capacity testing and each character area includes and indicative capacity assumption. This is to help deliver the strategic land use targets identified for the Town Centre in the Core Strategy. However, the identified capacity is not a requirement and does not preclude development proposals which deviate from it.
22.	GVA Grimley LLP on behalf of Tesco Stores	LTC OPP5a	The policy is overly prescriptive in seeking to group new residential development in the north of the site around a new 'Conington Green'	This previously proposed policy has been deleted from the Further Options Report. Following discussion with Tesco and

	Organisation	Policy	Comment	Response
	Limited		open space. The exact urban form of development should be developed through detailed design testing with the location and form of any open space designed to fit in with the proposed development form. Furthermore, the layout of the residential development currently being developed by St James on the adjacent Blakely and Gilmex site would not enable a central public space to be achieved as envisaged in this policy and the subsequent illustrative framework plan.	GVA Grimley, the Further Options Report proposes a new character area policy site specific policy (Policy 3.1)
23.	GVA Grimley LLP on behalf of Tesco Stores Limited	LTC EMP1	We support the recognition of the opportunity to redevelop the existing employment uses in the Conington Road area for a mix of uses including residential. The mixed use redevelopment of this site provides the opportunity to bring forward new development that will increase the vitality and viability of the town centre and assist with integrating existing residential neighbourhoods to the town centre.	Noted. Following discussion with Tesco and GVA Grimley, the Further Options Report proposes (Policy 3) and site specific policy (Policy 3.1) that address these issues.
24.	GVA Grimley LLP on behalf of Tesco Stores Limited	LTC TRS1	There needs to be flexibility when applying these car parking standards in certain circumstances. For example,	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC TRS1 (Lewisham Town Centre Parking Standards) has therefore been deleted.
25.	Drivers Jonas On behalf of Chesterhouse Properties/Workspace Limited	LTC HSG1	Policy HSG1 is generally supported but should be amended to accord with Policy 3A.2 of The London Plan which requires LPA's to "seek to exceed" their borough housing targets. Clearly Lewisham Town Centre has a key role to perform in terms of providing for new housing, it is suggested that the 4,100 figure should be increased to a minimum of 5,000 units. By reference to Table 3.1 the figure allocated to the Loampit Vale Opportunity Area vastly under estimates the capacity of the development opportunities that can be brought forward before 2016, this figure should be increased to a minimum 2,200 dwellings.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG1 (Meeting Housing Need) has therefore been deleted.
26.	Greater London Authority	LTC OPP6	Object: The release of industrial land without a detailed borough-wide assessment of need is not acceptable. The Council should be supporting a range of uses within the town centre, and not primarily retail and residential based. The fact that the area is deemed to make a "negative architectural contribution" to the town centre is not justification for releasing employment land.	The Employment Land Study was completed in November 2008 to inform the Core Strategy. Earlier proposals to develop parts of Engate Street for non business proposals have been dropped and previously proposed Policies LTC OPP6 (Engate Street) and LTC OPP6A (Engate Street Mixed Use Block) have been deleted.
27.	Greater London Authority	LTC OS1	Object: The policy should be reworded to reaffirm the presumption against inappropriate development of MOL expect in very special circumstances. The term 'in general' dilutes the protection afforded to MOL in particular. In addition, the revised MOL boundary, taking into account the Lewisham Gateway scheme, should be taken through the Core Strategy.	The previously proposed policy on MOL (LTC OS1) has been deleted in favour of the Borough-wide Core Strategy Policy 12 (Open space and environmental assets).
28.	GVA Grimley LLP on behalf of Tesco Stores Limited	GENERAL	The policy is overly prescriptive in terms of the location of public open space in the north of the site. The exact location of this space should be determined though detailed design testing to ensure that the space responds positively to the urban form of any new development and meets key urban design principles. There should be a recognition that the form of open space should be appropriate to an urban town centre	Noted. Following discussion with Tesco and GVA Grimley, the Further Options Report proposes (Policy 3) and site specific policy (Policy 3.1) that address these issues.

	Organisation	Policy	Comment	Response
			setting.	
29.	Greater London Authority	LTC COM4	Comment: The principle of this policy is supported. However, it should make more explicit that developers will be expected to meet the needs created by their proposals, particularly any needs arising from the social impact assessment.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC COM4 (Major Developments) has therefore been deleted.
30.	Greater London Authority	GENERAL	Support: TfL supports the regeneration of Lewisham and Catford town centres. TfL will continue to work with the borough to assist in delivering the transport improvements necessary to meet the identified development and regeneration needs. TfL expects the borough to maximise car free developments and seek s.106 contributions to mitigate their impacts upon the public transport network.	Noted.
31.	Greater London Authority	OMISSION	Omission: The AAP should refer to the Mayor's 110 Spaces Project, which includes a site in Lewisham.	The previous Mayor of London's 100 Spaces Project has been discontinued by the current mayor.
32.	Greater London Authority	LTC TRS2	Support: TfL strongly supports the use of shared parking in town centres.	Noted. In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC TRS2 (Lewisham Town Centre Parking Standards) has therefore been deleted. However, the promotion of shared private/public car parking spaces is retained.
33.	Greater London Authority	LTC TRS1	Support: TfL strongly supports the proposed car parking standards, which conform with the London Plan. It is noted that cycle parking provision is outlined according to the borough's UDP. TfL's cycle parking standards should be adhered to wherever the UDP standards do not meet this minimum.	Noted. However, in line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC TRS1 (Lewisham Town Centre Parking Standards) has therefore been deleted.
34.	Greater London Authority	LTC OS4	Support: This policy is welcomed.	Noted. However, in line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC OS4 (Nature Conservation) has therefore been deleted.
35.	Greater London Authority	LTC OS3	Comment: The biodiversity and open space aims of this policy are supported. However, there is no requirement for children's play space within the town centre, or as part of developments. This should either be included here or in a separate policy within the document.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC OS3 (Enhancing Open Space and Biodiversity) has therefore been deleted.
36.	Greater London Authority	LTC OS2	Support: Supported as a means of creating further connections beyond the town centre.	Noted. The previously proposed policy has been amalgamated with LTC URB7 (Enhancing Lewisham's Waterways).
37.	Greater London Authority	LTC SH9	Comment: Whilst there is no in principle objection to redefining the boundary of the town centre, the document should indicate how Lewisham will deliver the retail floorspace with a reduced site area.	The Further Options Report has been informed by 3D indicative capacity testing and each character area includes and indicative capacity assumption. This is to help deliver the strategic land use targets identified for the Town Centre in the Core Strategy. These demonstrate that the targets are achievable within a smaller town centre boundary.
38.	Greater London Authority	LTC ENV1	Comment: The principle of this policy is supported. Enhancing the Quaggy River corridor through Lee High Road areas is welcomed and	Noted. The previously proposed policy has been amalgamated with LTC URB7 (Enhancing Lewisham's

	Organisation	Policy	Comment	Response
			supports LP policy 4C.3.	Waterways).
39.	Drivers Jonas On behalf of Chesterhouse Properties/Workspace Limited	LTC HSG4	Policy HSG4 should be amended to clarify that a maximum of 35% affordable housing will be sought subject to the test of financial viability. As worded the policy fails to recognise the impacts that the significant additional costs in providing for major mixed use schemes, such as construction, infrastructure etc can have on the ability to deliver affordable housing. Likewise there should be a greater degree of flexibility within the tenure mix if the financial viability or local housing needs demonstrate that a 70:30 split is not appropriate.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG4 (Affordable Housing) has therefore been deleted.
40.	Greater London Authority	LTC COM1	Supported.	Noted. However, a replacement leisure centre at Loampit vale is under construction and this policy is no longer needed. n/a
41.	Greater London Authority	LTC ENV2	Comment: There are extensive areas around the rivers, which include flood zone 3. Development within these areas will require a Flood Risk Assessment in line with PPS25.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC ENV2 (Flood Plains) has therefore been deleted.
42.	Greater London Authority	LTC COM3	Supported.	Noted. This policy is proposed to be amended.
43.	Greater London Authority	LTC EMP2	Supported.	Noted. This policy is proposed to be amended.
44.	Greater London Authority	GENERAL	The LDA should be included as a delivery partner.	The LDA no longer exists, although the GLA is specifically referred to in the text that supports proposed new Policy 3.
45.	Greater London Authority	LTC IMP1	Supported.	Noted. This policy is proposed to be amended.
46.	Greater London Authority	LTC IMP2	Supported.	Specific implementation options are considered and reviewed as part of new issue 19. Proposed New Policy 3 refers to compulsory purchase.
47.	Greater London Authority	LTC IMP3	Comment: The priorities for s.106 monies are all supported as being important to the redevelopment of the town centre. However, the policy should also reflect the strategic s.106 priorities of affordable housing and transport, in accordance with London Plan Policy 6A.4. In addition to employment and training initiatives, it is also important to overcome barriers to work, for example the provision or contribution towards childcare.	Specific implementation options are considered and reviewed as part of new issue 19. Proposed New Policy 3 refers to the Council's Infrastructure Delivery Plan and Local Implementation Plan that include transport projects. The newly proposed Character Area policies (Character Area Policies 1 to 6) make clear that affordable housing is a priority.
48.	Greater London Authority	LTC IMP6	Supported. Further guidance on the necessary transport mitigation measures required from development will be given by TfL on a case by case basis.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC IMP6 (Transport Capacity) has therefore been deleted.
49.	Greater London Authority	LTC IMP7	Comment: This policy, and the three initiatives proposed, are welcomed in accordance with London Plan Policy 3B.12. However the LDA recommends that the policy includes a requirement for the developer, on major schemes, to submit an employment and training strategy to be secured through the section 106. An appropriate employment and	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC IMP7 (Education and Training Schemes) has therefore been deleted.

	Organisation	Policy	Comment	Response
			training strategy would secure implementation, stakeholder and developer involvement, employment and training targets and identify relevant initiatives. This will help to ensure regeneration benefits of a development are secured and delivered.	
50.	Greater London Authority	LTC OPP0	Comment: Whilst the principle of the opportunity area policies are supported, there is possibility for confusion with the London Plan Opportunity Areas, of which Lewisham is one. Consideration should be given to the title of these area specific policies, and whether an alternative name would be preferable.	The previously identified 'Opportunity Areas' have been renamed 'Character Areas' to avoid any confusion.
51.	DP9 on behalf of Land Securities	LTC SH9	The submission version of the AAP should not include reference to the changes to the town centre boundary. Instead, the town centre boundary, and therefore the extent of the area to which the AAP covers should be included within the introductory chapters of the document.	Noted. Submission version of the AAP will incorporate the outcome of the boundary review.
52.	Greater London Authority	LTC OPP1a	Support: As before, these policies accord with London Plan policies, including emerging policies in the further alterations by: sustaining and enhancing the vitality and viability of Lewisham town centre; accommodating economic and housing growth through intensification; supporting the plan's objectives by focusing on the town centre; and furthering sustainability objectives by maximising access by public transport and reducing carbon emissions.	The Core Strategy identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPP1a is no longer needed and has been deleted.
53.	Greater London Authority	LTC OS1	Support: In the case of Lewisham Gateway the loss of MOL constitutes inappropriate development but GLA officers are satisfied that very special circumstances exist in that particular case. Normally, however, changes to MOL boundaries should only be undertaken in 'exceptional' circumstances' through the LDF. Replacement of new open space elsewhere is not in itself necessarily sufficient justification.	The previously proposed policy on MOL (LTC OS1) has been deleted in favour of the Borough-wide Core Strategy Policy 12 (Open space and environmental assets).
54.	Greater London Authority	LTC OPP4	Object: The release of industrial land without a detailed borough-wide assessment of need is not acceptable. The Council should be supporting a range of uses within the town centre, and not primarily retail and residential based.	Noted. A Borough wide assessment has now been undertaken and proposed Character Area Policy 2 updates the previously proposed Policy LTC OPP4.
55.	Greater London Authority	LTC OPP5	Support: The promotion of river restoration in the area of Conington Road is supported.	Noted. Proposed Character Area Policy 3 amends previously proposed Policy LTC OPP5 and maintains references to enhancing the river.
56.	Greater London Authority	OMISSION	Omission: The AAP does not refer to the East London Green Grid – which the open spaces in Lewisham town centre form part of.	Amended proposed Policy URB7 (Enhancing Lewisham's Waterways) refers to the Green Grid.
57.	Greater London Authority	LTC COM2	Supported.	Planning permission has been granted for a new all-through school on the site of Lewisham Bridge Primary School. This site is proposed to be safeguarded for this use in the Site Allocations DPD and so Policy LTC COM2 has been deleted.
58.	CGMS Consulting	LTC OPP6	Lewisham Crown Post Office This is located at 107 Lewisham High Street (outlined blue on the attached plan). The proposed development is concentrated on the opposite side of the High Street and therefore the impact on the property may be acceptable. However, any development	Earlier proposals to develop parts of Engate Street for a multi-storey car park have been dropped and previously proposed Policies LTC OPP6 (Engate Street) and LTC OPP6A (Engate Street Mixed Use Block) have been deleted.

	Organisation	Policy	Comment	Response
			<p>proposals including the Post office site would need to provide for a replacement facility in a similar town centre location. Lewisham Delivery Office Lewisham Delivery Office is located in Engate Street (outlined red on the attached plan), where major redevelopment is proposed to increase footfall. The site currently comprises a sorting office, and associated service yard and staff accommodation. Parking is provided for 5 operational vehicles and 24 staff and visitor vehicles. An additional 10 customer spaces are provided off-site. The proposed development shows the potential demolition of all three properties on the west side of Engate Street, including the Royal Mail Delivery Office (Number 32). There are no proposals for the reprovion of these premises. The Delivery Office is a vitally important Royal Mail operational facility providing letter post delivery and collection services to Lewisham town centre and the surrounding area. It is very well located to provide efficient delivery and collection services. It enables Royal Mail to adopt highly sustainable methods of delivery / collection. The town centre location is also vital for meeting the target of delivering to all businesses and community facilities by 9:30 am each day. A total of 57 staff are employed at the Delivery Office which serves a total of 17,414 delivery addresses within the SE13 postal area. The volume of deliveries made by the Delivery Office is on average 250,000 per week which are split between 33 postman's' delivery walks and 5 driver deliveries. The hours of operation are 04:30am to 14:00pm Monday to Saturday. Within any development proposal, it is essential that the Delivery Office function is reprovod within a central location which satisfies Royal Mail's operational requirements. It should also be borne in mind that a peripheral location may also impact on residential amenity. This is because the Delivery Office operates during unsocial hours. Consequently, would you please regard this letter as an objection to the Area Action Plan in that it does not provide for the reprovion of the Royal Mail Delivery Office.</p>	
59.	Greater London Authority	LTC URB2	<p>Object: The sustainability requirements within this policy are supported. However, in addition to the requirement to incorporate renewable energy, a requirement for community heating systems should also be included. Of key strategic concern is the lack of a specific town centre wide policy approach to energy delivery. The draft Further Alterations to the London Plan prioritises district heating at the town centre level, led by combined heat and power to serve proposed and existing development. The AAP should maximise the opportunities to link developments through a district network Omission: There is no mention within policy of retrofitting of existing buildings.</p>	<p>The Further Options Report has been informed by the Low Carbon and Decentralised Energy Strategy Recommendations (December 2010) and identify three potential decentralised energy clusters. The Further Options Report includes a preferred option and draft policy on carbon dioxide emission reduction, which encapsulates the findings of the Strategy Recommendations.</p>
60.	Greater London Authority	LTC HSG4	<p>Object: The principle of the policy to implement the borough wide affordable housing target in Lewisham town centre and not adopt a separate figure is supported. However, the borough wide target of 35% is not acceptable. It is acknowledged that separate discussions are ongoing regarding this issue. The final paragraph of this section (entitled</p>	<p>In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG4 (Affordable Housing) has therefore been deleted.</p>

	Organisation	Policy	Comment	Response
			The London Plan) incorrectly states that borough wide affordable housing policies should reflect London Plan Policy 3A.8. In setting a borough wide target the Council needs to accord with Policy 3A.7.	
61.	Greater London Authority	LTC HSG2	Support: Accords with London Plan policies that encourage a mix of uses in town centres.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG2 (Mixed use Development) has therefore been deleted.
62.	Greater London Authority	LTC HSG1	Support: The borough-wide ten year target of 9,750 accords with the London Plan. The estimated number of dwellings for Lewisham Gateway accords with the current planning application being considered by the Council. This is considered to maximise the potential of the site in accordance with public transport capacity.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG1 (Meeting Housing Need) has therefore been deleted.
63.	Greater London Authority	GENERAL	Omission: The AAP does not have a specific policy on noise. Reference is made to the need to mitigate against noise pollution at the beginning of the document, but not reflected within the draft policies. Policies should be included which reflect London Plan Policy 4A.14. These should include both policies to mitigate and control construction noise and the need to plan and design development in response to surrounding noise sources.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. There is no need for a town-centre specific policy on noise.
64.	Greater London Authority	LTC TRS4	Support: TfL welcomes this policy, and suggests that a reference to the need to quantify the impacts upon pedestrians and cyclists within a Transport Assessment would strengthen this policy. Alternatively, this issue could be covered in an additional 'Transport Assessment' policy	Noted. Policy LTC TRS4 has been amended to make specific reference to cyclists as well as pedestrians. In line with Government guidance and to avoid repetition, the AAP will rely on policy on transport assessment contained in the London Plan and Core Strategy.
65.	Greater London Authority	LTC TRS5	Support: TfL strongly supports this policy, and suggests that developments below these thresholds that are also referable to the Mayor could also benefit from a Travel Plan. TfL suggests that consideration be given to widening the scope of this policy to include referable applications.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC TRS5 (Travel Plans) has therefore been deleted.
66.	Greater London Authority	OMISSION	Omission: TfL considers that all development proposals contained within the Area Action Plan boundary, which are large enough to be referable to the Mayor, should be accompanied by a comprehensive transport assessment, taking into account planned and committed developments. The transport assessment should be formulated in line with TfL's Transport Assessment Best Practice Guidance (2006). A policy relating to transport assessments with reference to this guidance would be helpful. The borough may also wish to consider seeking transport assessments for smaller developments.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. These policy documents set out requirements for transport assessment and no town-centre specific policy is needed.
67.	Robert Morley and Company Limited	LTC OPP6	The latest newsletter states your plans for the road in which my business stands Engate Street. When I telephoned your offices T was informed this was just an idea or vision of what the Council would Like to see. However on reading the newsletter it was implied some form of compulsory purchase and major redevelopment. I have been in Engate Street since 1975 and am positive that the owners of the three properties down this road would be unhappy with residential or parking in place of the current commercial buildings. Please could your organisation stop putting	Earlier proposals to develop parts of Engate Street for a multi-storey car park have been dropped and previously proposed Policies LTC OPP6 (Engate Street) and LTC OPP6A (Engate Street Mixed Use Block) have been deleted.

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			forward continual ideas that sound like actual plans which will go ahead and actually get on with the proposed development of the station end which is desperately needed to improve the look of Lewisham to residents and visitors. Every plan for Lewisham would appear to be about high street retail and housing, you are not supporting any business that actually makes or produces goods and these businesses are being forced out of the centre. These small businesses do employ staff who shop in the centre. There is very little or hardly any light industrial units in Lewisham centre area. If we were forced to move or look for new accommodation it would be extremely hard for my business to stay in Lewisham which would be a great shame as the company started in Lewisham in 1881. I would urgently welcome your ideas for our future continued trading.	
68.	Lewisham Gateway Action Group & Quaggy Waterways AG	LTC OPP1	As organisations who have made their concerns about the proposed Lewisham Gateway scheme well-known we wish to make the following comments on the proposed Area Action Plan. 1. The Lewisham Gateway site is crucial to the success of the Area Action Plan. In spite of repeated suggestions from LGAG, the developers have failed to take the Area Action Plan into account in their assessments of the pressure of extra traffic, pedestrians and commuters. There is no proof therefore, that the Gateway site can handle the cumulative impact of: a) Extra demand for public transport (only Lewisham Gateway has been assessed) b) Increased pedestrian circulation (only Lewisham Gateway has been assessed) c) Increased cycle use (only Lewisham Gateway has been assessed) d) Extra cars (only Lewisham Gateway, Thurston Central and Conington Road developments have been assessed)	Outline planning permission has been granted for the Lewisham Gateway proposals. The Core Strategy, informed by a Borough-wide and Lewisham town-centre specific transport studies, identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPP1a is no longer needed and has been deleted.
69.	Lewisham Gateway Action Group & Quaggy Waterways AG	LTC OPP1	The modelling which has been done shows that, just taking into account existing traffic + Gateway-generated traffic + traffic generated by the Thurston Road and Conington Road developments will create levels of saturation above those recommended by TfL, at many of the junctions around on the Gateway site.	See above.
70.	Lewisham Gateway Action Group & Quaggy Waterways AG	LTC OPP1	The "Opportunity Areas and Site Allocations" document describes the gateway thus: "The Gateway site forms the catalyst for the renaissance of Lewisham Town Centre and provides the central context within which this Area Action Plan has been prepared Supported by £15.9 million of Single Regeneration Budget funding, the Lewisham Gateway site is an extremely important development site within the context of the wider regeneration of Lewisham centre, London and the Thames Gateway as a whole. " If this is the case then it is foolhardy in the extreme to proceed with the Low H road layout which cannot handle traffic anticipated from a small element of the Area Action Plan, let alone all that is being planned. Rather than build on this crucial site for transport infrastructure we propose that the area be used to secure sustainable transport options, provide flexible responses to future flooding risks whilst realising Lewisham centre's key asset - its rivers and green spaces. We submit an	See above

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			alternative vision for the roundabout area at Appendix 1. It is based on principles which could be extended so that a riverside walk is possible along the Ravensbourne from Catford through to Deptford. It prioritises cyclists and pedestrians, whilst improving rather than increasing congestion. It suggests alternative means to provide employment and training and housing. It is an option which will NOT increase pollution in an Air Quality Management Zone. Our vision has been prepared by people who know and love the area. We are not planning experts, but the vision is submitted to demonstrate that other solutions to the roundabout area are possible, cheap and sustainable, and more in line with the original aims of the SRB bid for this area. The elements of our vision are simple. Some are taken from the current application, some are an extension of exemplary work already carried out by Lewisham and some come from our own knowledge and understanding of the area.	
71.	Greater London Authority	LTC HSG6	Supported.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG6 (Housing Density) has therefore been deleted.
72.	CGMS Consulting on behalf of Royal Mail Group Ltd	LTC OPP6	We previously submitted comments to the Lewisham Town Centre Area Action Plan Issues and Options Document in October 2005. It is now noted that the Engate Street site, currently designated in the UDP as an Employment Area, is being considered for a shift towards a greater mix of uses. Whilst we do not object to a mixed-use development in principle, we are of the view that existing employment uses in the town centre should be re-provided (Option LTC12A). Within the Preferred Options Area Action Plan we note that there are three Royal Mail properties which fall within the area of this document, two of which fall within Opportunity Areas / Site Allocations (see attached plan). A Royal Mail Delivery Office is located in the Engate Street area and a Crown Post Office is located on Lewisham High Street. The location of these properties is essential to meet Royal Mail's operational needs in the area. In addition, they provide important business and community facilities. The relocation of either or both premises would need to be carefully considered, and any alternative sites would need to meet strict operational criteria in order to maintain the existing level of service provision.	Earlier proposals to develop parts of Engate Street for a multi-storey car park have been dropped and previously proposed Policies LTC OPP6 (Engate Street) and LTC OPP6A (Engate Street Mixed Use Block) have been deleted.
73.	Greater London Authority	LTC HSG7	Support: TFL strongly supports this policy and welcomes its inclusion into this document.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG7 (A Restrictive Approach to Residential Parking) has therefore been deleted.
74.	Laurent Duriaud	LTC OPP1	high wider spaces out an affordable layout at the point of commercial's jobs i.e. second story building occupied by services of Lewisham facilities to encourage new jobs	Noted. The Core Strategy identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPP1a is no longer needed and has been deleted.

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75.	Laurent Duriaud	LTC OPP2	site is located north-west of Lewisham...include southern end to improve potential existing attractive street market i.e. extend market to south of town centre	Noted. Proposed Character Area 6 (Central character area) replaces previously proposed LTC OPP2.
76.	Laurent Duriaud	LTC OPP3	Lee High Road site east of Lee High road redevelopment along public shops to include offices of open space over existing car park, behind the park, small units featuring Lewisham High Street	Noted. Proposed Character Area 4 (Lee High Road character area) replaces previously proposed LTC OPP3.
77.	Laurent Duriaud	LTC OPP4	Loampit Vale mixed leisure for uses led for bus layover subject to relocating travellers site along strip to boulevard i.e. travellers site as road with tree-lined pedestrian walk	Noted. Proposed Character Area 2 (Loampit Vale character area) replaces previously proposed LTC OPP4.
78.	Laurent Duriaud	LTC OPP5	Conington road DLR building to redevelop residential creation of routes and access establishment of naturalisation of connection to development i.e. routes built by residents from a DLR funded initiative to encourage use of existing pedestrian walkways along embankments of trains	Noted. Proposed Character Area 3 (Connington Road character area) replaces previously proposed LTC OPP5.
79.	Laurent Duriaud	LTC OPP6	Engate Waterlink located opposite Library to include format into traffic environment, subject to junction enhancements turning sculpture enhancements into requirements to free flow.. i.e. use the canals for walkways,	Noted. Earlier proposals to develop parts of Engate Street for a multi-storey car park have been dropped and previously proposed Policy LTC OPP6 (Engate Street) has been deleted.
80.	Laurent Duriaud	LTC SH1	Development, Vision, objectives and strategy objectives Key themes Incorporating sustainability Draft policies: implementation framework phasing Monitoring •Relevant programmes covers the same range of policy themes and topics, notwithstanding the fact that they will be resolved This exercise was also un sustainability considerations at the heart of the process. And options (separately and should be read in conjunction with this Preferred Options •for targets for social-rented (RING CO-OPS) OPTIONS enhancements Lewisham Area Other planning reasons established against:	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG1 (Meeting Housing Need) has therefore been deleted.
81.	Laurent Duriaud	LTC EMP1	EMPLOYMENT SEPERATED FROM RESIDENTIAL	Noted. Proposed Policy LTC EMP1 (Employment Uses in Lewisham Town Centre) has been retained and amended.
82.	Laurent Duriaud	LTC SH1	URBAN AS OUTSIDE THE RETAIL CENTRE: Do not: Introduce a geographical basis for designating retail. Approach diversity of Model of Lewisham with family Target the town centre Appropriate £200 million to designated regeneration Plan interchange of Thurston Road Plan for and accommodate identified Tesco block Add retail floorspace FOCUS density Move toward metropolitan status (100,000m2). Establish a new town centre car park. Encourage then identified development plan	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG1 (Meeting Housing Need) has therefore been deleted.
83.	Laurent Duriaud	LTC SH1	Do: improve the local environment consistent with the local economy. Action overall transport. Plan major entrance railway location access. Attract capacity study in order to foster creative industries. Allocate mixed use in the centre. Review Panel Design: professional sectors for each category of research so breaking down developers authority...see urban design groups...more pro-activeness from these groups • Ground the town centre building to gate accommodated capacity and study former retail con help plan • reference to maintain, enhance and	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG1 (Meeting Housing Need) has therefore been deleted.

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			manage a sub regional district while growth in proportions are in London <ul style="list-style-type: none"> • Citibank Tower, is marketed for evidence of overview elements with other were rejected development; • linkages between the transport interchange and the town centre retail are not weak. create a new hub that will support the vitality and viability of the Market and issued locations • The Borough's built heritage includes: Key issues and problems CONSERVATION TAKING UP PLACE OF PUBLIC ENCOUNTERS... ART IN PARK 	
84.	Greater London Authority	GENERAL	Comment: Lewisham town centre is now identified in the draft Further Alterations to the London Plan as an Opportunity Area, along with New Cross and Catford. Policy 5D.2 states for these areas "taking account of other policies, developments will be expected to maximise residential and non-residential densities and to contain mixed uses".	Noted. The Further Options Report takes account of this policy.
85.	Greater London Authority	LTC OPP1	Support: These policies reflect the parameters of the current planning application. They provide a welcome set of high design standards and also reflect the broad and growing support for intensification, regeneration and infrastructure improvement in this area of south east London.	Noted. The Core Strategy identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPP1a is no longer needed and has been deleted.
86.	Lewisham Gateway Action Group & Quaggy Waterways AG	LTC OPP1	We propose a solution to the site with the following principles: <ul style="list-style-type: none"> •Maintain and enhance the site as a transport interchange (see note below) •Maximum benefit with minimal disruption. No major road works and all elements possible in phases •Build on and improve the links between bus and rail. Move bus parking (as proposed in current scheme) but create new bus stops and links to connect bus and rail. •Prioritise cyclists, buses and pedestrians in any traffic solution, and especially providing walkways alongside rivers and direct pedestrian crossings; •Improve pedestrian experience and realise Lewisham's natural assets. Improve rivers and the existing green space alongside them to give Lewisham a unique feel and character, providing a better pedestrian experience along with flexibility in dealing with changing flood risks •Improve congestion and reduce pollution. Traffic lights at peak times to stop the roundabout clogging up. Investigate possibility of adding direct pedestrian crossing on an all red phase of the traffic lights. •Realise Lewisham's man made assets. Preserve the heritage of Lewisham by maintaining distinctive local buildings (or at least their facades) and especially the historic Plough pub and Obelisk building, and by safeguarding the setting of St Stephens and the St Stephens conservation area. •Build to complement Lewisham's existing offer. The "Obelisk site" (southern end of Gateway) is a prime site for a department store and/or Cinema, both of which would compliment the existing retail offer and draw people from the transport interchange into it. The new site created within our vision, alongside rail, DLR and new bus stops is ideal for travel related shops, currently missing from the area. Units for Lewisham's creative industries could be incorporated into both sites. Development that would create job and community opportunities for young people, and further enhance Lewisham as a location for the creative industries. Job creation would be encouraged through: 	Noted. The Core Strategy identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPP1a is no longer needed and has been deleted.

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			<ul style="list-style-type: none"> •Provision of a cinema, arts centre or department store on the old Gaumont site; •Establishment (possibly with the help of an organisation 1 like Envirowork) of a training scheme on environmental maintenance to provide constant maintenance and supervision of new green spaces; •Opening up the leisure centre in the Riverdale again with the emphasis on provision of facilities for young and old people; •Investment in the street market. 	
87.	Greater London Authority	LTC URB6	Omission: There is a lack of commitment to inclusive design in the public realm and development projects. In addition, the policy should make more explicit the requirement to 'design out crime'.	Proposed Policy LTC URB56 has been amended to address both of these issues.
88.	Drivers Jonas On behalf of Chesterhouse Properties/Workspace Limited	LTC OPP4d	Principle ii) currently states that buildings of up to 8 to 10 storeys would be appropriate fronting on to Loampit Vale with reductions in height towards Thurston Road. This is overly restrictive. The presence of raised railway lines to the north mean that an appropriate design could include buildings of greater height. The policy should also allow for tower elements within proposals which might exceed 10 storeys. It is noted that the town centre is currently identified as an area suitable for tall buildings.	Previously proposed Policy LTC OPPd (Thurston Road) is to be replaced by proposed Character Area Policy 2 (Loampit Vale Character Area) and Site Specific Policy 2.2 (Loampit Vale North-west of Jerrard Street). These do not refer to storey heights.
89.	Drivers Jonas On behalf of Chesterhouse Properties/Workspace Limited	LTC OPP4	The development capacity that has been estimated for the Loampit Vale Opportunity Area fails to recognise the full potential of this area over the period to 2016. The residential units should be increased to 2,200 dwellings, the retail increased to 20,000 sq.m and the number of parking spaces increased to 800-1,000. These increases would support the stated objectives for Lewisham achieving metropolitan status in terms of retail and also to exceed the housing targets set for Lewisham within the London Plan.	The Further Options Report has been informed by 3D indicative capacity testing and each character area includes an indicative capacity assumption. This is to help deliver the strategic land use targets identified for the Town Centre in the Core Strategy. However, the identified capacity is not a requirement and does not preclude development proposals which deviate from it.
90.	Drivers Jonas On behalf of Chesterhouse Properties/Workspace Limited	LTC OPP1	It should be clarified that the bus layover facility which comprises part of the current Gateway proposals would be sited on the existing Travellers site on Thurston Road. It should also be stated that the nature of the site ownership and potential parcelling of sites provides an ideal opportunity for the phasing of developments in order to facilitate continued retail trading in the area, an important consideration as Lewisham seeks to achieve metropolitan status.	Noted. The Core Strategy identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPP1a is no longer needed and has been deleted.
91.	GVA Grimley on Tesco Stores Ltd	LTC OPP5	Having reviewed the 'draft' document we welcome the policy aspirations for the Conington Road area. In particular we are encouraged by the Council's support for the redevelopment of the Tesco block to increase the existing level of floorspace and aspirations for significant residential development on the site. We look forward to participating shortly in the consultation process of the final phase of the AAP preparation. However, we understand approval of this document for public consultation has been delayed. Accordingly, I provide below an initial view on the detailed policy, should you wish to discuss this further whilst awaiting the finalisation of the document.	Noted. Proposed Character Area Policy 3 (Connington Road) amends previously proposed Policy LTC OPP5.
92.	GVA Grimley on behalf of Tesco Stores Ltd	LTC OPP5	There is a danger that overly prescriptive policy could unduly limit or prejudice development on the site. We are concerned about the	The Further Options Report has been informed by 3D indicative capacity testing and each character area includes an

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			suggested development capacity for Conington Road area i.e. 1100 dwellings, 6000 sq.m. of retail, 200-300 car parking spaces and 3,500 sq.m. of open space. The development capacity for the site has yet to be fully tested. As such, there does not appear any basis for putting forward such thresholds. In order to maximise the sites potential and to ensure all proposals can be assessed on their merits, policy should simply provide a strategic vision for the Conington Road quarter, setting out the key aspirations for development. Equally, the framework plan for the development of Conington Road sets out the arrangement of residential and retail blocks on the site. Again the development capacity of the site has yet to be fully tested. Whilst it is important that key aspirations for the site form the basis of any development it is important that policy does not restrict the freedom of a design team to experiment with and deliver the most sustainable arrangement of land uses.	indicative capacity assumption. This is to help deliver the strategic land use targets identified for the Town Centre in the Core Strategy. However, the identified capacity is not a requirement and does not preclude development proposals which deviate from it.
93.	GVA Grimley on behalf of Tesco Stores Ltd	LTC OPP5	To reiterate, we welcome the strategic aspirations the Council are pursuing for the site. Should there be opportunity to discuss these more detailed issues with your policy team ahead of the finalisation of the Preferred Options, we would be happy to do so. Alternatively, given timescales, we are happy to engage with the Council during the formal consultation process.	The Further Options Report has benefitted from further discussions with Tesco and GVA Grimley.
94.	Dru Vesty	LTC OPP2h	I would wish to register an objection to any proposal which involves the redevelopment of the surface car parks around Lewisham Town Centre, including those in Clarendon Road, Slaithwaite Road and Molesworth Street (found a reference to the latter at LTC OPP 2h). These provide much used parking for short visits, including for elderly people and the disabled, and contribute to the vitality of the shopping centre. In fact, if they are not there, I would prefer to go elsewhere rather than suffer the delay and inconvenience of the multi-storey car park at the main shopping centre (I note that your proposal for Molesworth Street says that parking should be provided elsewhere if it is redeveloped, but this does not include assuming that the multi-storey is a substitute.)	The Further Options Report sets out an amended public car parking strategy. A previously proposed multi-storey car park is no longer being proposed for Engate Street and it is proposed to retain the existing surface car parks at Clarendon Road, Slaithwaite Road and Molesworth Street. Previously proposed Policies Policy LTC OPP6 (Engate Street), LTC OPP 2h (Molesworth Street surface car park) and LTC OPP3c (Clarendon Green) have been deleted.
95.	Dru Vesty	LTC OPP4	I would also wish to object to any more proposals to relocate the Swimming Pool at Ladywell including to any other land uses proposed for this site. It would be desirable if an additional swimming pool/gym could be included as part of any Loampit Vale development, as part of a school and open to the public or by a commercial company, but can see no justification as a Lewisham Council taxpayer for replacing Ladywell.	Planning permission has been granted for a replacement leisure centre at Loampit Vale and Ladywell leisure Centre is proposed to close in 3013, when the Loampit vale centre is open. Proposed Policy LTC OPP4 has been amended to reflect this and the Further Options Report identifies options for the future development of the Ladywell leisure Centre site.
96.	Dru Vesty	LTC OPP6	I would wish to support any proposal to remove the triangular stone eyesore on the Engate Street roundabout, referred to on p. 109 of your text as 'existing public art forms visual barrier' and to radically transform the appearance of Lewisham shopping centre by redoing the street furniture and paving to consistent quality standards, adding planting wherever possible and keeping it scrupulously clean.	Noted. Previously proposed Policy LTC OPP6 has been deleted. Proposed Policy LTC TRS4 (Mitigating against the impact of roads and roundabouts), which supports measures to improve the visual, pedestrian and cyclist experience of the town centre has been retained with amendment. Proposed Policy LTC URB6 (Public Realm) has been retained and expanded.

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97.	Dru Vesty	LTC HSG4	On new housing, I note that the Mayor now wants family housing as part of the London Plan affordable allocation. If there is not one already, I would wish to object to the Plan's housing policies unless they contain one which requires private external space for all future new dwellings, (with balconies large enough to sit on counting as applicable for this purpose). Also inclusion of the Mayor's open space/play strategy as an LDF plan policy to prevent further developments hostile to children of all ages.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG4 (Affordable Housing) has therefore been deleted.
98.	Barriedale Allotment Association	GENERAL	I and many friends enjoy shopping in Lewisham for a few good reasons, which include:- Reasonably sensibly managed traffic. This results outside rush hour there in a courteous and safe interaction between pedestrians and vehicles. Something rare in London! A pleasant environment to drive into and walk around since the Lewisham 2000 project was completed. Are we really to lose this open space, and relatively stress free environment ? Is there really to be more congestion around Lewisham as a result of this development ? We already suffer rat running commuter traffic around Brockley Cross. A few years ago at a meeting of the Brockley Cross Action Group, Steve Bullock promised to look into the possibility of putting in traffic light controlled crossings at Brockley Cross. Nothing came of this and since then at least one person [a schoolboy] has been killed at this junction. We do now have traffic calming measures, but the major problem is volumes leading to driver frustration! Is there any truth in assertions that as a result of the development traffic which would have travelled through Lewisham will seek out alternate routes, which will include residential areas such as ours ? If any of this is true what is the benefit to the residents of Lewisham of this sacrifice?	Outline planning permission has been granted for the Lewisham Gateway proposals. The Core Strategy, informed by a Borough-wide and Lewisham town-centre specific transport studies, identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPP1a is no longer needed and has been deleted.
99.	Greater London Authority	LTC EMP1	Object: This policy would allow for ad hoc loss of employment land which is not supported. In accordance with the Mayors draft Industrial Capacity SPG the Council should ensure that in terms of any release of industrial land they have taken into consideration their position in terms of a strategic and local assessment of demand and supply. Lewisham is considered a limited transfer borough for industrial land and the Council should seek to retain those sites in industrial use, which boroughs consider to be most important for industrial users. This may also include poorer quality sites, which provide scope for low cost industrial and accommodation for which there is demand. The Council should ensure it has addressed the criteria in 6.13 to 6.15 of the SPG and identify specifically which areas it wishes to release via the Area Action Plan process rather than through allowing loss of employment land after proof of 18 months vacancy. The Council should also consider that within the AAP the Lewisham Gateway site is the only opportunity area, which promotes other, uses besides retail and residential within the town centre. This could potentially mean a metropolitan centre without land for B uses including offices and those suitable for SMEs. Comment: If any release of employment land is permitted, the period of which buildings need to be	The Lewisham Employment Land Study was completed in November 2008 to inform the Core Strategy. Core Strategy Spatial Policy 2 identifies the Molesworth Local Employment Location to help ensure local employment opportunities and this is reflected in the Further Options Report. Earlier proposals to develop parts of Engate Street for non business proposals have been dropped and previously proposed Policies LTC OPP6 (Engate Street) and LTC OPP6A (Engate Street Mixed Use Block) have been deleted. Proposed Policy LTC EMP1 has been amended to provide further protection to employment uses.

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			vacant and marketed should be extended to two years in line with paragraph 6.15 of the draft Industrial Capacity SPG.	
100	Greater London Authority	LTC HSG5	Supported.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG5(Dwelling Mix) has therefore been deleted.
101	Robert Morley and Company Limited	GENERAL	I read with concern the plans that you have for Lewisham. It appears that your organisation is continually putting forward schemes like the redevelopment of the Station area of Lewisham High Street and the old Cinema site however, years go by and nothing ever happens, except the area under threat deteriorates, and makes Lewisham look unappealing to visitors. The buildings at that end have very short term tenants who spend nothing on the buildings and the flats above look derelict - what a great image for Lewisham to portray. We were informed at a local planning meeting which was five years ago that the Council had funding for the plans so why has this not moved forward.	Noted.
102	Drivers Jonas On behalf of Chesterhouse Properties/Workspace Limited	GENERAL	The policy should be amended to clarify that the provisions of the London Plan Density Matrix will be applied to assess an appropriate density within the defined Opportunity Areas. Whilst, regard will need to be had to the existing building form, massing and character, in areas which are going to experience significant change over the period to 2016, such as Loampit Vale, it will not always be appropriate to pay regard in terms of the scale of adjoining sites particularly where there are low height commercial and industrial units.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG6(Housing Density) has therefore been deleted.
103	Greater London Authority	LTC URB5	Supported	This policy is proposed to be retained, with amendment.
104	Greater London Authority	LTC URB4	Supported	This policy is proposed to be retained, with amendment.
105	Greater London Authority	LTC URB3	Omission: There is a lack of commitment to inclusive design in development. In addition, there is no reference made to the historic environment.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC URB3 (High Quality Design) has therefore been deleted.
106	Greater London Authority	LTC URB1	Comment: The criteria should also consider mix of uses/contribution to economic cluster of related activities and/or acting as a catalyst for regeneration.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC URB1 (Tall Buildings in Lewisham Town Centre) has therefore been deleted.
107	Greater London Authority	LTC SH8	Object: This policy, together with LTC SH5, does not take an integrated approach to managing the night time economy, and is vague. The Catford AAP takes a preferred policy approach to this issue. The policy itself should have a greater evidence base, encouraging a range of night time economy uses.	Noted. However, having reviewed proposed Policy LTC SH8 (Criteria for Evening Economy uses), it is intended to retain it with some amendment.
108	Greater London Authority	LTC SH5	Object: This policy should take a more proactive approach to accommodating and encouraging night-time economy uses, together	Noted. However, having reviewed proposed Policy LTC SH5 (Primary Shopping Areas), it is intended to retain it with some

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			with LTC SH8. The Catford AAP is effective in this regard and a similar approach should be adopted in Lewisham town centre. Reference should be made to the Mayor's Best Practice Guidance on Managing the Night Time Economy.	amendment.
109.	Greater London Authority	LTC SH4	Supported.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC SH4 (Impact of Lewisham Gateway on Southern part of the Town Centre) has therefore been deleted.
110.	Greater London Authority	LTC SH3	Supported.	Noted. It is proposed to retain Policy LTC SH3 (Lewisham Market) with amendment.
111.	Greater London Authority	LTC SH2	Support: The proposal accords with London Plan retail policies, including emerging policies in the further alterations by: sustaining and enhancing the vitality and viability of Lewisham town centre; accommodating economic and housing growth through intensification; supporting the plan's objectives by focusing on the town centre; and furthering sustainability objectives by maximising access by public transport and reducing carbon emissions.	Noted. It is proposed to retain Policy LTC SH2 (Vitality and Viability) with amendment.
112.	Greater London Authority	LTC SH1	Support: As identified in the East London Sub Regional Development Framework, expenditure in Lewisham is expected to increase by 40% by 2016 with the implementation of new development proposals in the centre, the largest of which will be Lewisham Gateway. This expanding retail role will serve to reinforce the centre's existing role as a major town centre by channelling retail proposals into the town centre, which is particularly welcomed. This increase in expenditure is mainly generated by a deeper penetration in the existing catchment rather than an expansion in its size. Lewisham town centre, and Lewisham Gateway in particular, are particularly suited to this strengthened retail role because of the excellent public transport accessibility available. This will bring particular benefits, in terms of widening choice, to those sections of the community without access to a car. The updated Retail Capacity Study is expected to be published in March or May of 2008. This will give updated capacity figures at the town centre level.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC SH1 (Lewisham Town Centre) has therefore been deleted.
113.	Greater London Authority	LTC HSG9	Object: The Residential Standards SPD is not considered to be sufficient with regard to noise to be referenced without further policy support in this document. A more thorough policy response to noise is therefore required within this document.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC SH9 (Residential Standards) has therefore been deleted.
114.	Greater London Authority	LTC HSG8	Support: The Council's proposals to ensure travellers' sites have essential services such as waste are supported. The Council should also ensure recycling facilities are made available near traveller sites where possible.	Core Strategy Policy 2 deals specifically with identifying sites for gypsies and travellers and confirms that the Council continues to monitor their specific needs and will identify a site through the Site Allocations DPD. The Ladywell leisure Centre site satisfies the selection criteria used by the Council in its search for a Gypsy and Traveller site

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				to meet the anticipated requirements of the Draft Replacement London Plan and is one of seven shortlisted sites in the Borough.
115	Greater London Authority	LTC URB7	Omission: Reference should be made to waterways heritage.	This has been addressed in a proposed amended Policy LTC URB7.
116	Lewisham Association of Street Traders	LTC OPP2j	Toilets for Street Traders Canopy for stalls Local storage Storage in the Lewisham Centre	It is proposed to delete previously proposed Policy LTC OPP2j. However, newly proposed Character Area Policy 6 (Central area character) refers to working in partnership with market traders in order to achieve environmental improvements to Lewisham High Street and the market area.
117	Ray Hall	LTC OPP1	My advice is to: a) At least delay a decision on the Lewisham Town Centre Gateway proposal and the directly inter-related Lewisham Strategic Framework until proper and full consideration of that alternative way forward has been given. b) Work with the interest generated by the Urban Renaissance process, not as 'sugar coating' to hide the negatives of a misconceived "H" plan proposal, but as a basis for enabling genuine team work across the whole community and from there an exemplary people place that can proudly celebrate the name LEWISHAM 9.5 The goal must still be completion of the total people and place project by 2012 so that our community can be showcased on the world stage in the context of the London Olympics and beyond. 9.6 Lewisham as a Town Centre and as a borough really could then be the 'tomorrow' we long for 'today	Outline planning permission has been granted for the Lewisham Gateway proposals. The Core Strategy, informed by a Borough-wide and Lewisham town-centre specific transport studies, identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPP1a is no longer needed and has been deleted.
118	Natural England	GENERAL	The Area Action Plan Objectives are listed on page 9 of this document, and of the nine objectives listed; all are broadly supported by Natural England especially the following; Objective 5 - Open Space/recreation Objective 6 - Transport Section 3.5 - Open Space (page 46 onwards) recommends a preferred option of retention, quality improvement and accessibility, this joint approach is commended, however, there appears to be little or no consideration of increased open space provision. The Council may wish to give consideration to the ANGST Standards mentioned earlier. Section 3.7 - Environment refers to the Rivers Quaggy and Ravensbourne with the Council's preferred approach being to support developments that provide improvements or enhancements to the Rivers, which is welcomed and supported by Natural England.	Noted. The Further Options Report sets out 9 new/amended objectives, including Objective 5 (Open space/recreation) and Objective 7 (Environment). Proposed Policy LTC URB6 (Public Realm) has been amended to make clear that the Council will promote opportunities to improve public realm so that it can make a positive contribution to the need for additional publicly accessible open space.
119	Greater London Authority	LTC OPP2	Comment: The AAP should emphasise the benefits of comprehensive redevelopment of sites for both landowners and the Council.	Previously proposed Policy OPP2 (Lewisham Centre and Adjoining land) has been deleted. Newly proposed Character Area Policy 6 (Central area character area) takes a different more pragmatic approach, focusing on opportunities at the northern and southern ends of Lewisham Centre.
120	Valerie Weber	LTC OPP0	Various things cause me concern. The impact of the scheme on wildlife, which is already under severe pressure in the town centre. One little stretch of river is not going to save the birds that become scarcer every year.	Noted. The Further Options Report continues to include objectives and draft policies relating to biodiversity and improving the environment of rivers.

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121.	Valerie Weber	LTC OPP0	High rise blocks are discredited, yet you are suggesting cramming them in. the impact on Lewisham life will be major, from the overshadowing of the area to the destruction of views to the cramming of additional vehicles into an already choked area.	Lewisham Town Centre is the most accessible location in the Borough and benefits from a very wide range of shops and services. High density development, if well managed, can deliver high quality design and have mixed tenure with adequate amenity space.
122.	Valerie Weber	LTC OPP0	Sustainable development! You have already allowed the area to be saturated with houses that have huge roof areas and not a solar panel in sight. I cannot see anything in these proposals that will perform any function other than to make the town centre more crowded, polluted and detrimental to health. Try doing what is right for local people and the environment. It may not get a knighthood but it would to respect and a good nights sleep.	The Further Options Report has been informed by the Low Carbon and Decentralised Energy Strategy Recommendations (December 2010) and identify three potential decentralised energy clusters. The Further Options Report includes a preferred option and draft policy on carbon dioxide emission reduction, which encapsulates the findings of the Strategy Recommendations. A number of additional references to climate change adaptation and environmental sustainability
123.	Kate Brown	GENERAL	More proper river access. No high rise. Not like Croydon Must be beautifully designed quality, this is key. Access to station- Kiss and Ride scheme, drop off needs to improve.	See response to 121. Core Strategy Strategic Site Allocations 6 seeks improvements to the station/public transport interchange.
124.	Laurent Duriaud	GENERAL	THE ENVIRONMENT LINKED WITH CULTURE OTHER SPHERES •The cultural strategy baseline access healthy lifestyles foods To protect and enhance To reduce centre positive lifelong learning •amenities for vulnerable: To increase the provision of accessible and inclusive everyday facilities operational PROMOTION IN Day centres •focus requirements of attention should be on child •POOLING AND PRIORITIES what alternatives were considered and why they were rejected N/A •THE HALF FINISHED AS POTENTIAL FOR USE PERHAPS TRANSPORT ROUTES THROUGH public Realm right-angle a street 'half-finished' Three existing buildings in dust Key Objectives' bends lead to proceedings is sculpture Park •examined in rank, of pupils achieving A-C in more than 5 GCSE's. over the last five years, standards in education, as shown by the Standard Assessment Tests (SATS), have also improved in respect of younger students •it is considered that new development in the Lewisham College: How good or bad is the current situation? DO trends show that it is getting better or worse? How far is the current situation from any established thresholds or targets? Are particularly sensitive or important elements of the receiving environment affected (e.g. people, resources, species, habitats)? Are the problems reversible or irreversible, permanent or temporary? HOW difficult would it be to offset or remedy any damage? Have there been significant cumulative, synergistic or indirect effects over time? Are there expected to be such effects in the future? •Neighbourhood Renewal Strategy Crime Neighbourhood policies breed criminal behaviour e.g. neighbourhood watch, therefore break away from the idea of community as a domesticised neighbourhood and promote instead a society of open spaces at the core of neighbourhoods...stop the virus through growth of biodiversity •identify those that contributed to the research document as potential co-operatives in implementation	Noted.

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			<ul style="list-style-type: none"> •opportunity Area policies mixing occupational groups habitat would encourage the breathing space of anomalies •produce consultation monopoly essays during progress critique.. 	
125	Andrew Grant	LTC URB1	No tall buildings	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC URB1 (Tall buildings in Lewisham Town Centre) has therefore been deleted.
126	Ray Hall	GENERAL	<p>8.0 CONCLUSIONS 8.1 The overspend on roads and below ground services in the Lewisham 2000 process lead to the Town Centre's recognized key asset - the market traders - not getting the enhancement they were promised. The market canopies they had planned for and agreed with the Council became an impossibility. Good people and especially a very good man (Ken Walking) were 'crushed'. 8.2 Instead of completing the implementation of the Lewisham 2000 strategy - which could have included subsequent funding of the market canopies - and capitalizing on the investment made, valuable public funds have been spent on planning more roads and below ground services: infrastructure that would remove the benefit of those only recently constructed at such cost. 8.3 Those new costs are in themselves so high as to preclude any possibility of good and relevant provision overtly for the community in the Town centre and especially for young people. As a lover of Lewisham who has committed so much of his adult life to enabling the enhancement of our borough focussed on our town centre -1 feel deeply for the market traders and the young people. 8.4 The Urban Renaissance Lewisham "H" plan proposal is therefore fundamentally misconceived. Dressed as "renaissance" it is: a) Yet another road scheme b) Unnecessary. I use the roundabout as a pedestrian almost every day and as a car driver somewhat less. I know it well. Mayor Ken Livingstone's Congestion Charge has had its effect. The number of vehicles passing through Lewisham Town Centre has visibly reduced and beneficially so. I also see that beneficial effect in Belmont Hill where I live and work. A major new road scheme is not necessary. d) Out of date. Congestion charges are being considered elsewhere, including nearby Greenwich Town Centre, which will reduce traffic in our own town centre even more. e) Wasteful and wrong. Spending on road schemes that waste recent and present Misdirecting private sector investment in support is also wrong 8.5 What is needed is to work with the investment already made in money, commitment and even in lives. Work with what we have. Don't waste but build an even better future by enhancing what has been achieved in the past and carrying the present forward in the context of the harsh ecological realities we are facing locally and across our world.</p>	<p>Outline planning permission has been granted for the Lewisham Gateway proposals. The Core Strategy, informed by a Borough-wide and Lewisham town-centre specific transport studies, identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPP1a is no longer needed and has been deleted.</p> <p>Proposed Policy LTC SH3 (Lewisham Market) has been retained with amendment and this seeks improvements to the market area.</p>
127	Ms Wilson	LTC URB3	I would like to see improvements to the public realm. We should also enhance the culture of the Town Centre. Emphasis should be placed on brightening the feel of the Town Centre.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC URB3 (High Quality

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				Design) has therefore been deleted. However, the town-centre specific Policy LTC URB6 (Public Realm) has been retained and amended to address this point.
128.	Ms Wilson	LTC OPP2j	Improve the market stalls in line with the new development.	Previously proposed Policy LTC OPP2j has been deleted. However newly proposed Character Area Policy 6 (Central character area) refers to working in partnership with market traders in order to achieve environmental improvements to Lewisham High Street and the market area.
129.	Helen Robinson	LTC OPP0	Provide 'Café Culture' embracing all ethnicities. Provide a Cinema in the Town Centre. Clean up some of the 'Open Front' shops. They smell of drains and leave rubbish everywhere. More security presence in the day to reduce muggings and other crimes. Attract wider range of shops like the Bromley Glades.	Noted. The Further Options Report includes objectives and a number of proposed policies relating to providing active frontages, designing out crime and improving the shopping offer.
130.	Greater London Authority	LTC TRS3	Support: TfL strongly supports the positive policies and statements contained within this document, which relate to the promotion of cycling and walking, including improving connectivity and permeability and enhancing existing links. It would further enhance the document if reference were made to TfL's Walking and Cycling Plans. It is further noted and supported that new at-grade pedestrian crossings will be introduced, and TfL would expect these to comply with BV 165 standards. It is stated that redevelopment would need to analyse the movement of people in order to provide logical pedestrian and cycle links. This is supported, and TfL would recommend that the following be utilised to assist in this, which could be referenced in this document: •A Pedestrian Environment Review System audit; •Pedestrian and cycle counts; and •Fruina Level of Service to ensure that pedestrian facilities are providing adequate capacity for pedestrian numbers (particularly as it is stated that pavements become crowded at peak times). TfL would welcome further discussions on this and further information can be obtained from TfL's Best Practice Guidance on Transport Assessments.	Noted. Policy LTC TRS3 (Cycling and Walking Routes) has been amended, partly to address these comments.
131.	DP9 on behalf Land Securities	LTC OPP2j	The provision of contributions towards environmental improvements along the High Street from stakeholders will be delivered through a Section 106 Agreement as part of any planning permission. This policy should be amended to acknowledge this. It is also considered that the wording of this policy should be amended to state 'providing environmental improvements in this core area, such as...'. This provides the opportunity for other schemes to come forward or the schemes that are itemized to be prioritised. Finally, all Section 106 planning obligations need to be relevant to the proposals and are subject to the viability of the scheme proposed.	Previously proposed Policy LTC OPP2j has been deleted. However newly proposed Character Area Policy 6 (Central character area) refers to priorities for site-specific developer contributions. The acceptability of planning obligations (both in-kind and financial contributions) is governed by Government policy and the CIL Regulations 2010. There is no need to rehearse the tests here.
132.	DP9 on behalf Land Securities	LTC OPP2i	This policy is welcomed.	Noted. It is proposed to retain this policy.
133.	DP9 on behalf of Land Securities	LTC OPP2f	It is considered that the wording should be amended to read as follows 'The Council will encourage the comprehensive redevelopment of the	Previously proposed Policy LTC OPP2f is proposed to be replaced by Site Specific Policy 6.2, which incorporates the

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			Beatties Buildings and Model Market sites to provide a major retail or leisure uses on the ground with commercial and/or residential uses above. Such redevelopment...'	suggested wording.
134	DP9 on behalf of Land Securities	LTC OPP2e	It is considered that the wording of this policy should be updated to accord with the comments made above, so this policy would relate to the Molesworth Street Environment.	Previously proposed Policy LTC OPP2e is proposed to be deleted. However, newly proposed Site Specific Policy 6.2 addresses this issue.
135	Anna Gichaga	GENERAL	The impact of the development on Viney Road and the surrounding areas have not been taken into account. i.e. parking (there are no restrictions on the periphery of the town centre), environmental impact (local air pollution) increased crime. Wardens don't patrol some of the surrounding area, for example "Viney Road Estate PFI". I truly believe why Viney Road estate never got developed: "Out of sight, out of mind"	Noted. Viney Road is outside of the proposed Town Centre boundaries and is not addressed directly by the Further Options Report. However, impact on and connections with the area surrounding the Town Centre are addressed in the Further Options Report.
136	Ray Hall	GENERAL	3.0 WASTED ASSET : Lewisham 2000 3.11 have in front of me a brochure entitled, "Lewisham 2000: Building a better future" (Appendix Two). It shows: a) A plan of the "New Town Centre Improvements", a dominant element being highway alterations that include a sculpture roundabout at the southern end of Lewisham Shopping Centre and a much larger roundabout at the confluence of Loampit Vale, Lewisham Road, Lewisham High Street and Molesworth Street (which was to be enlarged as a dual carriageway). b) Part of the "better future" proposed was a new Quaggy Park next to St. Stephen's Church. It will feature "a pathway alongside the River Quaggy". c) It shows a "bus station upgraded, with belter waiting facilities, and fronted with plants and shrubs" as part of a new interchange with the railway station and the then proposed DLR station. d) Two phases are stated: the first- the construction of the roads, roundabouts and their approaches. Hidden beneath those roads was to be significant re-routing of services (gas, electricity, water, drainage, telecommunications etc) to facilitate that new infrastructure. The intended completion date was March 1994. e) Phase Two was to be completed by the Spring of 1995 and would include "improvements to Lewisham High Street. Once traffic has been removed from the High Street, there will be scope for better use of the space. The market has been a central attraction since the beginning of this century. Lewisham 2000 will strengthen its role even further. " f) A working relationship with the private sector was part of that strategy. For the plan also states that "At a later stage, private developers will be able to take over the empty sites created to provide more shops, offices and leisure places". A key site is called the "Former Odeon Site" at the northern climax of the mall of the Riverdale Centre, and hence the whole shopping centre as it faces the to-be significantly enhanced transport interchange with its rail, DLR and bus stations. g) So important was that interface that it was seen not just as a confluence of transport nodes, including cars, but of rivers (the Quaggy and the Ravensbourne) as well as people as pedestrians and cyclists. That confluence was to be deliberately not through canyons of concrete - whether as river channels or buildings - but through a convergence of	The Lewisham 2000 Local Plan was adopted under the Lewisham adopted Unitary Development Plan 1996, which was superseded by the current adopted Unitary Development Plan 2004. This in turn is being superseded in part by the emerging Core Strategy and the proposed AAP

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			<p>hills and valleys. As a result there was to be a very clear predominance of trees and green spaces throughout, with a sense of openness that could bring immense refreshment into the concentrated heart of South East London which is Lewisham Town Centre and its environs. h) In the "Lewisham 2000" plan, bus stops were shown surrounding the shopping centre causing the whole town centre to be a single interchange of people with pedestrian connections in all directions linking it to the adjacent residential areas. i) Major car parking provision was shown above the Riverdale Shopping Centre and then to its west, east and south serving not just the mall and the to-be pedestrianised High Street - with its market at its heart - but also the total New Town Centre as one transport, retail and social interchange: in a sense a fully revived pivot not only for our borough but for the whole of South East London. j) The key new ingredient in that pivot was undoubtedly to be the northern gateway facilitated by the new roundabout and dominated by trees, planting and the rivers and with the opportunity for significant private sector investment on the sites generated - and especially that of the former Odeon site. Other sites were anticipated in Lewis Grove and at the southern section of the Town Centre. k) The consequence was to be people in a prosperous place they could enjoy, belong and identify with as human beings. A damaged part of our Earth was now able to be revived.</p>	
137.	Laurent Duriaud	GENERAL	<p>transport refer to a report of programmatically timings to supplement planning information..? e.g. • Rationalise existing TRANSPORT proportions to work • consider transport links as part of environment/employment/education/dominant vs subsidiary motors/simultaneous action/self powered mobility/threshold elusive/the radical industry of monopoly/acceleration of ineffectiveness/lifetime of transport net/imagination stunned-speed/traffic of industrialisation/Armageddonoptions/crisis energy/forward contents/regions context of transportation agencies structure and focus meetings • links between retail and transport are weak • above score so cannot be whole percentage of travel time travelling to a fairly typical service • direct parts connectivity in comparison to regionally average both no. of the community walking or cycling • implementation both stages The extent to which energy is Renewable objective achieved traffic. depends strongly on a rush from a construction and occupation .</p> <ul style="list-style-type: none"> • this is trains hour • Given the level of public transport accessibility the Council will seek not to issue new on-street parking permits for inhabitants • principally the densities particularly Local Implementation plan include the reduction of congestion allocated criteria based policy should be included within in order to provide a framework to assess the disturbance from the respects of the special in particular sectors community • Travellers' site Consistency with Other Council Policy 	Noted.
138.	Laurent Duriaud	LTC TRS1	Documents • exceed the maximum parking standards as set out in Table	Noted. In line with Government guidance and to avoid

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			<p>3.2. Should 10 staff Cycle Parking standards Appropriate taxi ranks and coach/bus parking stands be required as part of the Transport Assessment. • Residential Parking Strategy states that boroughs should seek to ensure that new developments is the minimum necessary (the only exception to this approach is to ensure that developments are accessible for disabled people). • This policy advocates that boroughs adopt the maximum parking standards whilst neighbouring maintain Important to the existing interchange • Higher rates will contribute to Developments • Have a significant transport threshold required to submit a travel plan in order to reduce the management measures, including pedestrian routes and facilities; and/or public transport • Re-connect befitting quantum Gateway a Pleasant Key the direct interchange linkage provide permeable between buses including roundabout DLR network and a safe, metropolitan confluence • Identify stakeholders to public • The Planning Employment Land Reviews in terms of objectives, architecture emphasised land use schemes • number of fatal or serious transport accidents. Between 2001- reduction was results of the recent stakeholder consultation problems with pedestrian particularly conflict</p>	<p>repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC TRS1 (Lewisham Town Centre parking Standards) has therefore been deleted.</p>
139.	Laurent Duriaud	LTC EMP1	<p>EMPLOYMENT • Report majority of respondents during the occupation stages, whilst local people in the ongoing enterprise; jobs in environment sector AND Architecture: promotion of jobs through building works: specify occupations within planning guidance points • Assessment of Employment Significant positive contribution Neutral Negative ? Unknown • will there be short term impacts • Long Large scale Permanent are likely? frequent / constant? Receptor (s) Sensitive Cumulative effects? • Overall error: to be accommodated in such a way as to avoid use of residential streets. • Planning policy Guidance To increase • Authorities particular concern: indices of Multiple Deprivation almost And Lewisham levels the barriers' to crime The living seems as the principal of poverty and social exclusion. Rate compared for out of work over enterprise by the positioned comparators benchmarked. And most stock increased comparatively dominated for nationally rates environmental determinates through use of materials</p>	<p>Noted. Noted. Proposed Policy LTC EMP1 (Employment Uses in Lewisham Town Centre) has been retained and amended.</p>
140.	Laurent Duriaud	GENERAL	<p>ISSUE The London Plan BIG USES: UNCERTAINTIES AND RISKS • ECOLOGY PROMOTED AT THE FRONT OF BUILDINGSE.EG. THROUGH HEDGE • Re use canals as pedestrian transport use • MENTAL HEALTH ORGANISATIONS CONSULTED IN ASSESSING AMENITY FACILITY TO VULNERABLE AND IN MAKING SUGGESTIONS TO THE BUILT ENVIRONMENT questions addressed to mental health organisations... were the assessment's predictions of sustainability effects accurate? Is the plan contribution to the achievement of desired SA objectives and targets? Are mitigation measures performing as well as expected? Are there any adverse effects? Are these within acceptable limits, or is remedial action desirable? • Lewisham boundary at waterfront addressed a possibility of re-Shipping industry as a mass of wealth transformed into pockets by</p>	<p>Noted</p>

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			<p>dealing on the money markets....</p> <ul style="list-style-type: none"> • Parks and recreation grounds may offer (afford) a break if the weather is fine in winter you have to be well-clad and well-fed to enjoy them: thus the emphasis on open space as recreation should be readdressed as a built recreational form. such as social centres •including evening: worship industrial Assembly warehousing Distribution in Hospitals/medical centres Leisure Residential Hotels Museum Schools Education •Buildings are badly scaled and lack rhythm and grain end this: uses at frontages to street support developed. •Refuse collection promoted to support homeless needs e.g. food waste of supermarkets: 1. secondary frontage refuse retail collector back market place. •24 hour Lewisham: 1. Lighting landscaping clock tower •Development between places of respite and cultural inputs 1. Rank street furniture and taxi public art. •safety of the environment in meeting centrally convenient permeability •located continuation traders attract investment •east-west housing local needs •where reasonable place; Action Area uses in Lewisham High Street to cost Core as follows: enabling including planning existing promoting enhancing focusing policies specific for the use of the land. 	
141	Laurent Duriaud	GENERAL	<p>Architectural Quality stigma industrial sheds have no architectural merit.</p> <ul style="list-style-type: none"> •Victorian buildings fragment benefit to the development on the short side of a strong urban edge to the street and the corner •parking is for the large retail uses, Residential accommodation fronting open space opposite \=points of access to the site. potential for a high quality, high density mixed use development may lead into an area of larger scale-buildings and public space. •it's surrounding context reflected in new proposals. public life in historic decline 	Noted
142	Laurent Duriaud	LTC OPPO	<p>Opportunity Area Policies</p> <ul style="list-style-type: none"> • General principles for Adjoining Entrances and Routes Form Green Public urban Realm • vehicular servicing and parking Frontage Block Land of Opportunity End Link to Patrol Pit • Strip Use of Centre The Shopping Surface Site Tower and High Road side • Elmira street potential for a new mixed use block • The results of the recent stakeholder consultation identified • To increase good decent standards facilities • Improve Social inclusion of the community town centre . • Manage pedestrian Health publicly • Risk the flood of immigrants and reduce its effects. • Dependency to existing private provision of performance of sources increase access To Heritage culture • Efficiency=learning spaces • increase amount of quality associated diversity of vibrant, local density 	Noted
143	Laurent Duriaud	GENERAL	<p>Objective focused around centre whilst fringes categorised for use as an open space...locate policy towards fringes with the powers of attraction, sustenance, digestion, repulsion, nutrition, growth and formation towards mathematical perfection OVER sustainability. the emphasis of the centre as location for retail... change the emphasis maximise use in residential fringes. With a traditional resident population low acre a standard comparatively. classification: Typology sports Ground Allotments parks &</p>	Noted

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			Gardens square Amenity Greenspace Highways Enclosure	
144.	Ray Hall	LTC OPP1	<p>a) My view is that the current proposals for the Lewisham Town Centre Gateway site will accelerate the dying process needlessly and irresponsibly. In themselves they are negative and as an exemplar for all of our community they communicate a public and private sector lack of seriousness of response to the reality of life and its terminal fragility. b) In saying this, my focus is the stated very poor carbon footprint for the Gateway project. Greenwich BC has just declared a 0% carbon footprint within 5 years of completion for an equivalent scheme on the former Greenwich Hospital site. Other recently declared schemes in the City and such inner urban areas as the Elephant and Castle are stated as having a 0% carbon footprint at completion. c) My view is that Lewisham BC would be irresponsible as a planning authority - and as the participant owner of a key land component of the project - to accept anything less. d) The Lewisham Town Centre Gateway is, therefore, an opportunity for our community to make a positive contribution toward enabling first the survival of our home planet and then - if it is not too late - her revival. The present proposal fails to grasp that opportunity and instead accelerates the prospect of the death of our Earth. Its concept is therefore fundamentally wrong. e) The Lewisham Town Centre Gateway proposal is also able to be a key component in a Local Strategic Framework that could enable an even greater contribution to the same goals of survival and revival. Two other major opportunities also exist in our borough: namely Convoys and Catford Town Centre. f) A zero carbon footprint should be the goal there too, as it should be for every development and every activity in our borough, including all of our homes. This requires commitment by everyone of us, supported by competent technical guidance and inspirational direction. The public sector through our community's elected representatives must take a lead and do so courageously.</p>	<p>Outline planning permission has been granted for the Lewisham Gateway proposals. The Core Strategy, informed by a Borough-wide and Lewisham town-centre specific transport studies, identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPP1a is no longer needed and has been deleted.</p>
145.	Ray Hall	GENERAL	<p>9.1 My purpose in writing this my last consultation response is to say: 'Work with what has been achieved through the very recent Lewisham 2000 process. Don't destroy it. Build an even better future in Lewisham Town Centre and in every part of our borough through its Local Strategic Framework - and do so with a sense of genuine urgency as part of a vision for the survival and revival of our Earth. Above all let us all do it together. "</p>	<p>Noted.</p>
146.	Ray Hall	LTC OPP1	<p>2.6 Based on this fundamental criterion, my view is that, a) The present proposal for the Lewisham Town Centre Gateway is fundamentally misconceived and is conceptually wrong. b) As a professional experienced in regeneration I know that there is a far better way forward which - and without any vested interest - I am able to outline as a way forward from the viewpoints of commercial viability, ecological responsibility and urban design. c) That way forward is highly practical. Knowing something of the ethos and capability of both Land Securities</p>	<p>Outline planning permission has been granted for the Lewisham Gateway proposals. The Core Strategy, informed by a Borough-wide and Lewisham town-centre specific transport studies, identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPP1a is no longer needed and has been deleted.</p>

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			and AMEC/Taylor Woodrow, as well as the heart beat of so many good people in Lewisham Borough Council, my expectation is that it would be welcomed by each and could be implemented through an enlarged joint venture. d) A goal would be full completion by 2012 to enable our town centre to showcase our borough community in the context of the London Olympics and beyond. e) That way forward has the broader community as the primary beneficiary. My trust is that it is able to be welcomed as a different basis for discussion by other individuals and groups representing that community. 2.7 For my view is that the present proposals are immensely wasteful in the use of key public assets: money, land and the goodwill and involvement of local people.	
147.	Ray Hall	LTC OPP1	Do it with people who care and who have the experience and knowledge necessary locally, environmentally and in terms of urban regeneration - and do it not for political gain but because it makes sense. I do not know them well, but those people should include: a) Land Securities as the owners of the mall which has a reputation for practical concern for our environment. It just may be that they could entice Debenhams back to consider Lewisham Town Centre again. If not now Debenhams: a retailer of equivalent calibre. b) AMEC Taylor Woodrow as the preferred developer for the Urban Renaissance project. 1 think the project itself has been wrongly conceived. I also think there is a discussion to be had with AMEC Taylor Woodrow as a now interested party can work as part of a larger team to change the direction of recent history and do so for even greater good. c) I also think that the new Deputy Mayor of Lewisham Borough Council, Heidi Alexander, cares. Her responsibility as Chair of Regeneration has, I suspect, been overwhelming at times with many very complex issues to be grasped. I respect that and appreciate her genuine concern enormously. I trust these insights will be of help to her. d) There is one man that stands out in the broader community and who very painfully has, I understand, seen what I have seen having been more formally within the Urban Renaissance process than 1.1 unreservedly support his recent article in the newsletter of the Friends of the Quaggy. His name is Matthew Blumler. He understands our hills and valleys and their confluence more than anyone I know and can picture what could still be if there was the political courage to dare to change direction. I may be trying to put words into his mouth (if so I apologise) but I suspect Matthew has seen how clever, driving and manipulative Gavin's conception and handling of the Urban Renaissance process has been.	Noted. See above
148.	Ray Hall	GENERAL	4.5 It is nevertheless an indication of how perceptive and commercially clever Lewisham Borough Council's original overall Lewisham 2000 strategy was that: a) A key part of the road scheme component - Molesworth Street with its northern roundabout - enabled a primary car park and service area of substance. It was ' b) essentially out of sight, above the mall and also able to serve a future major new department	Noted.

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			store on the Former Odeon Site. c) No new junctions were needed to bring that department store into being, nor were traffic lights other than for pedestrians. d) That car park and department store could also have been connected direct to be rail, DLR and bus stations without one pedestrian having to cross one road at grade. e) A total solution was still within reach - and still is.	
149.	Ray Hall	GENERAL	5.1 As can be seen, having analysed the macro planning and detailed issues relevant to enabling our town centre to rise again at the heart of South East London, I saw the Lewisham 2000 strategy as being a viable way of bringing it into being. I was not alone. Many retailers and residents did as well including market stall holder, Ken Walkling and the committee he chaired representing the Lewisham Association of Street Traders. The people, therefore, who operated the recognised key asset that brought a distinctive to Lewisham Town centre, were in favour of the Lewisham 2000 proposal.	Noted.
150.	Ray Hall	GENERAL	5.4 Why am I recounting all of this? In answer I will let fly some emotions! It is because: a) A town centre is not a road scheme nor is it even a place in isolation. It is a people. Individual, precious people like Derek Moore and Ken Walkling. b) It is about the history of their lives, their dreams and their commitment to a better future. c) It is about market traders and senior managers at House of Fraser and Debenhams who want to feel that what they represent is actually wanted - and as much as it is about a young man and woman feeling romantically inclined when sitting on a park bench in Quaggy Gardens. d) It is about trees that have matured and rivers that converge. It is about hills and valleys framing the lives of a confluence of people from every corner of the Earth. e) It is about believing that the investment of one generation really can lead to further enhancement in the next. f) It is about believing that elected representatives and the officers that serve them really do want to work with local people - and not just tick the box of consultation because they have to - then do what they originally set out to do anyway. g) It is about using every ounce of human and environmental resource wisely, recognizing that we all have a role to play in shaping a vibrant "our town centre" where we can all belong. h) It must not be about anyone's personal ego, commercial or power trip. Nor must it be about hiding an error and a failure. i) It is therefore not a power political / curriculum vitae football for elected representatives and officers that are meant to serve but who have high aspirations for themselves. j) Nor is it about any notion of containing Slough Estates into their mall (following a fall-out over the leisure centre) by destroying their hoped site for a department store by proposing a new highway across it: "H" plan or otherwise. k) It is therefore not about not working with an enlightened land owner / developer of national pre-eminence such as the successor to Slough Estates - Land Securities - to shape a total partnership strategy for literally the whole Town Centre as the economic and social heart of our whole borough	Noted.

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			and the urban region we have the privilege of being part of.	
151.	Ray Hall	GENERAL	6.0 THE FINANCIAL COST OF THE "H" PLAN 6.1The following should be noted: a) The stated cost of the Lewisham 2000 highway improvement programme was £34m. More was spent. I do not know the final figure. b) I understand some £9m has already been spent or committed to the Lewisham Gateway Development embodied in its new road scheme - the "H" plan - that would remove the investment made in the Lewisham 2000 programme. c) I also understand that a further £25m will be spent to re-route below ground services and other infrastructure constructed as part of the Lewisham 2000 project to enable the "H" plan if it is implemented. d) The total is £68m and almost certainly more.	Outline planning permission has been granted for the Lewisham Gateway proposals. The Core Strategy, informed by a Borough-wide and Lewisham town-centre specific transport studies, identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPP1a is no longer needed and has been deleted.
152.	Ray Hall	LTC OPP1	6.2 Part of the draft agreement agreed between Slough Estates and Debenhams was the commitment to open their new department store in 2006 on the Former Odeon Site. The following should therefore be noted a) That site was deliberately the right size for such a department store relevant to an urban regional town centre of Lewisham's potential stature. A smaller site would have been non-viable. b) The "H" plan with its central pedestrian boulevard and space consuming separate vehicular servicing inevitably results in much smaller retail units. It is almost as if it was conceived to deliberately exclude any possibility of a department store of the size and capability of a Debenhams. c) As soon as the Town Centre Gateway Development proposal, with its "H" plan, was advocated, even its possibility removed any notion that a Debenhams of a viable size appropriate to the intended status of Lewisham Town Centre could come to our town centre. d) Slough Estates, Debenhams and indeed any party cognizant with the commercial and social dimensions of a viable and thriving town centre knew that its major department store had to be contingent with the main retail offer in its mall. The original Lewisham 2000 strategy embodied that. The "H" plan now deliberately removed that possibility. e) In addition, therefore, to the £68m direct financial cost, some 500 new jobs were lost that could have been generated by a new department store of the size and quality of a Debenhams. f) Those jobs have not enhanced the lives of many young people and their families nor the businesses that could have benefited from the critical mass generated. As a conservative estimate a total of some 1000 new jobs were lost at the conception of the "H" plan and its advocacy - even as an option - by representatives of Lewisham Borough Council. g) The impact into the local economy of those lost jobs since 2006 when Debenhams could have opened could be some £30m per year.	See above.
153.	Ray Hall	LTC SH1	6.3 A completed mall should have opened in 2006 with a showcase and high value Debenhams department store as a genuine gateway with pedestrian connections direct to the consolidated transport node with the DLR. It was not. Instead: a) The many people that now travel through Lewisham Town Centre to the now booming Canary Wharf and City see	Noted.

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			<p>dereliction. b) Lewisham's retail core in the mall is hidden behind that dereliction with signage almost desperately saying "I'm here." c) When struggling to find the entrance to the mall, the visitor is greeted by a sterile entrance with low grade retail - including the often empty office of the Urban Renaissance Lewisham team- and a long abandoned leisure centre. It is little wonder that the customer footfall there is minimal. 6.4 To add further pain to this already tragic picture, the market traders still do not have the canopies they and the whole Town Centre deserve. None are even planned. Nevertheless they valiantly add a people face to an overall impression of a low grade, low value shopping centre. 6.6 Perceptions are key. Instead of low grade and potentially unsafe, Lewisham could in 2006 at the climax of the extended Lewisham 2000 process now be seen as being; a) A revived and major town centre at the heart of a newly vibrant South East London. b) A town centre of rising stature moving rapidly toward the renown of a Kingston and certainly one to challenge Bromley and Croydon. c) A town centre with a future and hence one that has also become a family destination with good provision for children. d) A primary youth destination with facilities integrated into the retail offer and easily accessible from the transport node and the community around. More on this shortly. e) A town centre with youth loyalty and the short and long term spend it implies. The vast majority of that spend and allegiance leaves Lewisham and goes to Bromley, Blue Water and increasingly to London East's emerging city centre of Canary Wharf. f) I will explore this more deeply but, as my parents knew so well, when there is youth loyalty there can be consideration toward the elderly. Grannies feel safe and the grand children they love have a natural friend. The resultant cycle is virtuous and priceless. Failure to plan for it and to achieve it is foolishness. This logic could have been a reality now.</p>	
154.	Ray Hall	GENERAL	<p>a) So much money has been spent on PR brochures promoting the Urban Renaissance project - implying how wonderfully community centred the whole venture is - yet its reality has been just the opposite. Good people like Steve Bullock, who has featured on several occasions, have been caught in the momentum of a misconceived venture and I think have inadvertently been used. b) That sugar coating has been hiding a fundamentally misconceived scheme and has been part of what appears to have been a deliberate campaign to prevent genuine debate. c) I am not aware of another planning application that has had so much public money and officer time spent on its promotion in the form brochures, postcards, events and advocacy. At one point a brochure actually declared that the "H" plan will be approved. d) This publically funded PR weighting in favour of an as yet unapproved planning application raises serious doubts as to the objectivity of the planning process adopted by officers and the Council itself. It should be challenged. e) My suspicion is that many Councillors and officers will be</p>	Noted. This is not a matter for the production of this development plan.

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			horrified when they realize how much they have been caught up in the momentum of something that has been fundamentally misguided and detrimental to true democracy.	
155	DP9 on behalf of Land Securities	LTC OPP2a	This policy repeats issues set out within Policy OPP 2. As stated in respect of this policy above, development proposals are unlikely to deliver the changes referred to within this document as these locations would be outside of the site application boundary. These would instead be secured through a Section 106 (or equivalent) Agreement.	Previously proposed Policy LTC OPP2a (Entrances and routes) has been deleted. Newly proposed Character Area Policy 6 (Central character area) sets out a revised form of words.
156	Ray Hall	LTC OPP1	2.3The two proposals (The Local Strategic Framework and the Lewisham Town Centre Gateway) are enmeshed. One must be conceived with the other. Equally, one cannot be concluded without the other. Both plans are fundamental to the very well being of our community and the planet which is our home. Both should have as their primary criterion being exemplars in enabling the survival of our Earth. 2.4 It would be far better to delay a decision on each and to urgently get the fundamental thinking right than to acquiesce to "pressure" to commit to a direction or "a scheme" that threatens the life of our Earth from the outset. I say "pressure", because there is undoubted historical 'political' pressure to approve the current Gateway proposal for reasons I will outline below. That pressure needs to be confronted and reversed. 2.5 In item 2.4 I also used the phrase "a scheme". I have been told by officers that the present outline planning application is not a scheme and that there will be the requirement for at least one future detailed planning application for the design of the actual buildings. a) The current application is, however, effectively a detailed planning application for a road scheme that establishes an urban design framework. That framework defines the sites that in turn will define the nature of the buildings. Those buildings already have a form and have only to be finalised in terms of detailed design. b) If the current submission is approved, the end scheme will have been shaped: an end scheme that will be accepted as making a negative contribution to the survival of our Earth. c) I am emphasising this because it would be easy to say, "Let us approve the submission and sort out the carbon footprint issue later". My point, however, is - and I know this very well as a designer - if the concept is wrong the final outcome will be wrong too. If the concept is right, then there is the opportunity for an outcome that works.	Outline planning permission has been granted for the Lewisham Gateway proposals. The Core Strategy, informed by a Borough-wide and Lewisham town-centre specific transport studies, identifies Lewisham Gateway as a Strategic Site (Spatial Policy 2) and includes a specific policy to guide its development (Strategic Site Allocation 6). Policy LTC OPP1a is no longer needed and has been deleted.
157	CgMs Consulting on behalf of the Metropolitan Police Authority	LTC IMP3	The MPA are mindful that PPS1 states that Councils should prepare development plans which promote inclusive, healthy, safe and crime free communities, Also Circular 05/05 paragraph B9 advises developers may be expected to contribute towards the cost of infrastructure provision, which would not have been necessary, but for their development. Any large scale development proposals in Lewisham town centre may have significant resource implications for the MPA's objectives in seeking to create a safe and secure environment, The MPA are mindful that the planning policy framework supports this objective	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC IMP3 (Lewisham Town Centre s106 Pooling and Priorities) has therefore been deleted. The justifying text to proposed New Policy 3 makes specific reference to the Metropolitan police under Partnership Working and refers to the Council's Planning Obligations SPD

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			and therefore recommend the impact of significant development in policing is given due consideration in the Council's Local Development Framework. The planning policy support for this approach is detailed in the following paragraphs. The provision of effective policing is of crucial importance across London to ensure safe environments are created consistent with national planning policy guidance in Planning Policy Statement 1 (PPS1). Paragraph 16 of PPS1 states that development plans should promote development that creates socially inclusive communities. It specifically states plan policies should ensure: a) the impact of development on the social fabric of communities is considered and taken into account; b) safe, healthy and attractive places to live are delivered. At a strategic level, paragraph 3.76 of the London Plan recognises the importance of initiatives relating to policing and community safety and crime reduction in improving the quality of life of many Londoners. Given the policy content above, it is important to recognise the role of the police within the provision of community infrastructure and this should be reflected within relevant planning policy documentation. This reflects our representations made at the Issues and Options Draft of the TCAAP. Suggested Alterations An additional criterion should be added to policy LTC IMP3 with the following text: (m)- supporting the provision of emergency services and in particular of the police.' Also policy LTC IMP4 should be altered to read: - 'In implementing the policies and proposals put forward in this Area Action Plan, the Council will comply with the statement of Community Involvement by encouraging consultation and stakeholder involvement on all key development sites and major applications'.	(that addresses the need for emergency services infrastructure).
158.	DP9 on behalf of Land Securities	LTC OPP2d	reference to the removal of the service ramps does not acknowledge the structural and management issues of the Lewisham Centre. Whilst consideration could be given to this policy as part of any proposal, the changes to the Lewisham Centre that would be required to achieve this are so significant it is unlikely that these would come forward within the lifetime of this document.	The previously proposed Policy LTC OPP2d (Vehicular Servicing and Parking) has been deleted.
159.	Environment Agency	LTC ENV2	Proposed Policy – Flooding The Council will seek to reduce flood risk and its adverse effects on people and property in Lewisham and Catford Town Centres by: a) appropriate comprehensive flood risk management measures within or affecting the Town Centres which are agreed by the Environment Agency, b) reducing the risk of flooding from surface water and its contribution to fluvial flooding by requiring all developments of one or more dwellings and all other development over 500m2 of floor space in the Town Centres to have appropriate sustainable drainage schemes, Floor levels for the buildings will be set at a minimum level of the 1 in 100 year flood level plus climate change allowance with an additional 300mm 'freeboard' added to that level. c) maintaining flood storage capacity within flood Zone 3 by refusing any form of development on undeveloped sites which reduces flood storage	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC ENV2 (Flood Plains) has therefore been deleted.

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			<p>capacity or impedes the flow of flood water d) maintaining the effectiveness of the more frequently flooded area (Zone 3b)of the flood plain to both store water and allow the movement of fast flowing water by not permitting any additional development including extensions, e) not permitting residential development or change of use or other 'more vulnerable' uses within Zone 3a or 'highly vulnerable uses' within Zone 2 where flood risks cannot be overcome. f) supporting the redevelopment of existing developed sites in the Town Centre in Zones 3a and 3b for 'less vulnerable' uses where: i. a minimum increase of flood storage capacity of 20% can be secured (all flood storage areas to be effective at all times throughout the life time of the structure/use and do not create unacceptable risks to people in times of flood) ii. reduces impedence to the flow of flood water where there would be flowing flood water iii. appropriate access for the maintenance of water courses is maintained iv. no adverse impact on the integrity and effectiveness of flood defence structures g) requiring any development in Zones 2, 3a and 3b to be designed to be flood resilient/resistant. h) requiring all development proposals within Zones 2, 3a and 3b, and development outside this area (Zone 1) on sites of 0.5ha or of 10 dwellings or 1000 m2 of non-residential development or more, to be supported by an appropriate Flood Risk Assessment. Existing riverside access will be maintained and opportunities will be sought to improve access in conjunction with developments in riverside locations.</p>	
160	Environment Agency	OMISSION	<p>River Ravensbourne and its Tributaries Catford and Lewisham have the River Ravensbourne and its tributaries running through them and is a significant local and regional amenity. This proposed Policy aims to ensure that the setting of the rivers is protected and enhanced. This involves protection of landscape features that contribute to the setting and protecting and enhancing views of the river. Particular care will be needed in assessing the visual impact of development proposals in locations that form part of the setting of the river to ensure that the setting is not damaged and that new development makes a positive contribution to the riverside environment. Proposed Policy: Recreational use of the River Ravensbourne Facilities which support the recreational use of the River Ravensbourne will be safeguarded and promoted by: a) refusing development which involves the loss of facilities unless it can be demonstrated they are no longer required. b) supporting the maintenance and provision of visitor facilities, including those for access to the water. Proposed Policy: River Ravensbourne and its Tributaries The Council will seek to maintain and look for opportunities to enhance the setting of and increase space for the River Ravensbourne and its tributaries. In considering development proposals it will: a) Ensure the protection of landscape features that contribute to the setting of the rivers b) Seek to protect and enhance existing views of the rivers c) Pay special attention to the design of development located in riverside</p>	<p>Three previously proposed policies have been amalgamated into newly proposed Policy LTC URB7 (Enhancing Lewisham's Waterways). This revised policy seeks to address these comments.</p>

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			settings to ensure that it respects and makes a positive contribution to the setting of the rivers d) Ensure that the quality of the water environment is maintained e) Seek opportunities to improve public access to and alongside the rivers and ensure that existing public access is maintained	
161.	Environment Agency	LTC ENV1	Flood Alleviation Scheme The Environment Agency and other key delivery partners are currently progressing a plan on a major capital scheme to reduce flood risk in Lewisham. This involves the development of a "River Corridor Improvement Plan" for a reach of the Ravensbourne from Ladywell Fields to the confluence of the River Thames. This improvement plan will help ensure the principles of 'making space for water' are maximised and proposed future developments (regeneration) fit into a spatial improvement plan. We propose that this Plan be owned and branded by the London Borough of Lewisham. This river corridor improvement plan shall be put together in conjunction with a professional land agent to address the land ownership issues and the London Borough of Lewisham to address proposed development sites and issues. It is envisaged that there will also be consultation with developers, river user groups and environmental pressure groups to help ensure the benefits of consultation are maximised as well as identify opportunities for collaborative working. This Plan will tie-in with the proposed EU Interreg IVb Urban Rivers for Urban Renewal Project and will serve as the foundation for implementing (constructing) the Ravensbourne at Deptford Flood Alleviation Scheme. This flood alleviation scheme is proposed to reduce the risks of flooding to 500+ properties within Lewisham and is also the proposed match funding for the EU Interreg IVb project bid.	The Further Options Report makes reference to the River Corridor Improvement Plan.
162.	Environment Agency	GENERAL	We welcome the inclusion of the Environment Agency as one of the key delivery partners. By continuing to work closely together at all stages we can ensure new development addresses environmental issues and achieves environmental protection and enhancement. The AAPs offers the opportunity to produce development with the highest environmental standards. We would like to work with you on the best ways to manage and improve the green infrastructure and on achieving significantly improved water and energy efficiency.	Noted.
163.	CgMs Consulting on behalf of the Metropolitan Police Authority	LTC SH5	Policies LTC SH5 - Core Shopping Areas and LTC SH6 - Non-Core Shopping Areas both restrict the change of use from Class A1 to other uses. A key part of the MPA's estate review is to introduce police 'shops' into locations with good accessibility. The purpose of police 'shops' is to provide direct public interface facilities with the police. The Borough's town centres are ideally located to accommodate these facilities. Therefore the MPA recommend the Council's policies allow the introduction of police 'shops' in the main shopping frontages of the town centres. In addition, the MPA are in the process of introducing Safer Neighbourhood Teams into every ward across the Borough. These teams require office accommodation from which police officers can patrol local areas on bike or foot. Such	Police "shops" can be introduced into the re-titled Primary Shopping Area and Secondary Shopping Areas where they meet the criteria outlined in draft policies LTC SH5 (Primary Shopping Areas) and LTC SH6 (Secondary Shopping Areas). It is not considered necessary to list special circumstances for such Police Shops.

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			office accommodation could be sited in local shopping centres and parades either in isolation or with police 'shops'. The MPA request the Council's policies recognise the potential need for the introduction of these police facilities with the local shopping centres and parades.	
164	CgMs Consulting on behalf of the Metropolitan Police Authority	LTC SH6	Policies LTC SH5 - Core Shopping Areas and LTC SH6 - Non-Core Shopping Areas both restrict the change of use from Class A1 to other uses. A key part of the MPA's estate review is to introduce police 'shops' into locations with good accessibility. The purpose of police 'shops' is to provide direct public interface facilities with the police. The Borough's town centres are ideally located to accommodate these facilities. Therefore the MPA recommend the Council's policies allow the introduction of police 'shops' in the main shopping frontages of the town centres. In addition, the MPA are in the process of introducing Safer Neighbourhood Teams into every ward across the Borough. These teams require office accommodation from which police officers can patrol local areas on bike or foot. Such office accommodation could be sited in local shopping centres and parades either in isolation or with police 'shops'. The MPA request the Council's policies recognise the potential need for the introduction of these police facilities with the local shopping centres and parades.	See above.
165	CgMs Consulting on behalf of the Metropolitan Police Authority	LTC URB6	Draft policies LTC SH2 - Vitality and Viability and LTC URB6 Public Realm both deal with urban design issues in the Lewisham Town Centre. The MPA recommend that both policies should refer to Secured by Design principles and complies with the ODPM's guidance 'Safer Places: The Planning System and Crime Prevention' in order to ensure that future development meets the Government's highest crime prevention guidance and standards.	Proposed Policy LTC URB6 (Public Realm) has been amended to address this comment.
166	Environment Agency	LTC ENV2	The floodplain is our biggest asset in managing flood risk and meeting the future challenge of climate change. Floodplains should be safeguarded to protect their natural role in allowing for the storage and free flow of flood waters. Inappropriate development within floodplains should be resisted where such development would itself be at risk from flooding or may cause flooding elsewhere. The Town Centre is constrained by the predominately man made rivers, as well as the capacity of the existing sewer and surface water systems. Therefore, a robust approach is needed to manage severe flood risk in the future. Flood risk is managed by conveying water in concrete channels surrounded by development. This is not sustainable and will be increasingly ineffective. The Environment Agency would be unable to justify investing more resources with this way of managing flood risk. Flood defence works are an intervention in natural processes. Therefore a balance has to be struck between maintaining and supporting natural floodplains, and reducing flood risk. The protection of floodplains from the physical threats posed by development is dependent on the powers exercised by local planning authorities. The Environment Agency therefore supports the Councils' proposal to safeguard some flexible areas for flood storage such as the	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC ENV2 (Flood Plains) has therefore been deleted.

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			proposed Cornmill Park. PPS25 creates a duty to first demonstrate whether a development is being sited in the lowest flood risk zone. The Sequential Test and where appropriate the Exceptions Test are prerequisites and reducing the vulnerability to the development area is not a substitute for this. The effectiveness of rivers and floodplains to convey and to store flood water, and minimise flood risks, can be adversely affected by human activity, especially by development which physically changes the floodplain. Risk to life is of primary concern in relation to any development in areas at risk from flooding, but especially for residential development.	
167	CgMs Consulting on behalf of the Metropolitan Police Authority	LTC COM3	The MPA's previous representations, dated 12th October 2005, outlined the need to ensure that where community provision is made elsewhere within the Town Centre the previous site supporting the community provision should not have to be redeveloped or re-used for community uses, It is noted that this has been taken on board through the introduction of an exception criteria policy. However in order to provide clarity to the wording of the policy a minor recommendation is made below. Suggested Alteration The second paragraph of policy LTC COM3 should be altered to read:- 'The redevelopment of existing community, leisure and entertainment spaces for alternative uses will only be permitted if it can be demonstrated that...'	Proposed Policy LTC COM3 (Range of Community, leisure and Entertainment Spaces) addresses this comment.
168	Environment Agency	LTC IMP3	We are pleased to note that the council will seek developer's contribution for managing flood risk. Planning Policy Statement 25: Development and Flood Risk (PPS25) makes it clear that it is the responsibility of those planning development to fully assess flood risk, propose measures to mitigate it and demonstrate that any residual risks can be safely managed. However, flood resistance and resilience measures should not be used to justify development in inappropriate locations. PPS25 Annex G provides guidance to Local Planning Authorities regarding the contribution developers should make. Paragraph G5 states that: 'authorities may wish to consider entering into an agreement under Section 106 of the Town and Country Planning Act 1990 to ensure that the developer carries out the necessary works and that future maintenance commitments are met. They may also apply planning conditions, which would require completion of the necessary works before the rest of the development can proceed; Annex F sets guidance on management of surface water. Para F11 states: ' For new development, it may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the site. There may be circumstances where it is appropriate for infiltration attenuation storage to be provided outside the development site, if necessary through the use of a Section 106 agreement.'	For each of the proposed character areas that are within Flood Zone 3a, a proposed character area policy that identifies the need to work closely with the Environment Agency over flood risk issues.
169	CgMs Consulting on behalf of the	LTC IMP4	The MPA are mindful that PPS1 states that Councils should prepare development plans which promote inclusive, healthy, safe and crime	Previously proposed Policy LTC IMP4 (Partnership and Consultation) is deleted. Proposed New Policy 3 addresses he

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	Metropolitan Police Authority		<p>free communities, Also Circular 05/05 paragraph B9 advises developers may be expected to contribute towards the cost of infrastructure provision, which would not have been necessary, but for their development. Any large scale development proposals in Lewisham town centre may have significant resource implications for the MPA's objectives in seeking to create a safe and secure environment, The MPA are mindful that the planning policy framework supports this objective and therefore recommend the impact of significant development in policing is given due consideration in the Council's Local Development Framework. The planning policy support for this approach is detailed in the following paragraphs. The provision of effective policing is of crucial importance across London to ensure safe environments are created consistent with national planning policy guidance in Planning Policy Statement 1 (PPS1). Paragraph 16 of PPS1 states that development plans should promote development that creates socially inclusive communities. It specifically states plan policies should ensure: a) the impact of development on the social fabric of communities is considered and taken into account; b) safe, healthy and attractive places to live are delivered. At a strategic level, paragraph 3.76 of the London Plan recognises the importance of initiatives relating to policing and community safety and crime reduction in improving the quality of life of many Londoners. Given the policy content above, it is important to recognise the role of the police within the provision of community infrastructure and this should be reflected within relevant planning policy documentation. This reflects our representations made at the Issues and Options Draft of the TCAAP. Suggested Alterations An additional criterion should be added to policy LTC IMP3 with the following text: (m)- supporting the provision of emergency services and in particular of the police.' Also policy LTC IMP4 should be altered to read: - 'In implementing the policies and proposals put forward in this Area Action Plan, the Council will comply with the statement of Community Involvement by encouraging consultation and stakeholder involvement on all key development sites and major applications'.</p>	issues raised in this comment.
170.	DP9 on behalf of Land Securities	GENERAL	<p>Having reviewed the document in general terms it is considered that there is a significant amount of repetition between this document and national and regional planning guidance, as well as with the emerging policy set out within the Core Strategy and Development Policies DPDs. It is acknowledged that at Submission stage this is likely to be edited down, but we consider that this needs to be considered carefully to ensure that the document is not criticised for being repetitive at the Submission stage.</p>	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy, a large number of previously proposed policies have been deleted.
171.	DP9 on behalf of Land Securities	GENERAL	<p>It is considered that the linkages as set out on the diagram are not clear. The diagram does not show any linkages in a north south or east west direction through the Lewisham Centre.</p>	All previous images have been revised
172.	DP9 on behalf of Land	LTC HSG1	<p>Table 3.1, Page 20: The reference to the 'Lewisham centre' should be</p>	In line with Government guidance and to avoid repetition, the

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	Securities		clarified to confirm if this relates to the Lewisham Shopping Centre or Lewisham town centre as a whole.	AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG1 (Meeting Housing Need) has therefore been deleted.
173	DP9 on behalf Land Securities	LTC HSG4	It is considered that the wording of condition LTC HSG4 and HSG5 is repetitive of the wording of policies within the emerging Core Strategy. Notwithstanding this, it is considered that these Policies must be flexible to ensure that the type, mix and tenure of housing to be delivered is suitable for the site on which it is to be delivered. For example, family housing generally requires more amenity space and it may not be possible to deliver the required quantum of amenity space in some locations within the Borough.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG4 (Affordable Housing) has therefore been deleted.
174	DP9 on behalf of Land Securities	LTC HSG5	It is considered that the wording of condition LTC HSG4 and HSG5 is repetitive of the wording of policies within the emerging Core Strategy. Notwithstanding this, it is considered that these Policies must be flexible to ensure that the type, mix and tenure of housing to be delivered is suitable for the site on which it is to be delivered. For example, family housing generally requires more amenity space and it may not be possible to deliver the required quantum of amenity space in some locations within the Borough.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG5 (Dwelling Mix) has therefore been deleted.
175	DP9 on behalf of Land Securities	LTC SH1	The identification of the need for additional retail floorspace in Policy LTC SH1 on the Lewisham Centre site is welcomed. The wording within the actual policy should be clarified to confirm what is considered to be short and long term and the difference between convenience and comparison floorspace need should be broken down. The wording of this policy should also acknowledge that within the life time of this document a new retail capacity study may be commissioned and the policy should be able to respond to any recommendations set out within this document. The reference to the land adjacent to the Lewisham Centre should include land to the north to ensure that the wording of this policy is consistent with other policies within the AAP. It is therefore proposed that the condition be amended as follows: (a) Lewisham Gateway (b) Lewisham Centre and land south and north of Lewisham Centre © Lee High Road - western and eastern ends The policy, or supporting text, should also be amended to make reference to the lack of large units within the town centre at present. It is suggested that the following wording be added in reference to land to the south of the Lewisham Centre in order to achieve this: 'iii. Land south of Lewisham Centre - The Model Market site and former Beatties building represent a major opportunity to anchor the southern end of the centre. This will play an important role as the town's centre of gravity shifts northwards towards Lewisham Gateway. Given this existing uses in this location, redevelopment of this area may not result in a large net increase in retail floorspace, but does provide the opportunity to create large individual units that are lacking at this end of the town centre.'	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC SH1 (Lewisham Town Centre) has therefore been deleted.
176	DP9 on behalf of Land	LTC SH4	The inclusion of Policy SH4 is welcomed, as it is considered important that	In line with Government guidance and to avoid repetition, the

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	Securities		the impact of the Lewisham Gateway proposals on the southern part of the centre is a key consideration in the future of the town centre.	AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC SH4 (Impact of Lewisham Gateway on Southern Part of the Town Centre) has therefore been deleted. However, the purpose of the previously proposed policy is encapsulated in an amended Policy SH2 (Vitality and Viability).
177	CgMs Consulting on behalf of the Metropolitan Police Authority	LTC SH2	Draft policies LTC SH2 - Vitality and Viability and LTC URB6 Public Realm both deal with urban design issues in the Lewisham Town Centre. The MPA recommend that both policies should refer to Secured by Design principles and complies with the ODPM's guidance 'Safer Places: The Planning System and Crime Prevention' in order to ensure that future development meets the Government's highest crime prevention guidance and standards.	Proposed Policy LTC URB6 (Public Realm) has been amended to address this comment.
178	Sainsbury's Supermarkets Ltd	LTC SH5	The AAP and the Proposals Map both refer to Core and Non-Core shopping Areas within the Town Centre Boundary. This terminology is outdated and inconsistent with PPS6, which refers to primary and secondary shopping frontages. PPS6 states that development plans and proposals maps should identify the Primary Shopping Area, which is the preferred location for retail development. The AAP and Proposals Map should thus be amended accordingly.	PPS6 has since been replaced by PPS4. However, proposed policies LY+TC SH5 and SH6 have been amended to refer to 'Primary Shopping Areas' and 'Secondary Shopping Areas'.
179	Natural England	GENERAL	RELATES TO SUSTAINABILITY APPRAISAL The Executive Summary provides a list of the objectives for this document which are broadly supported, and in particular; Soc 13 - Open Space To increase the quality and provision of publicly accessible open spaces". Indicators proposed for this objective includes the hectare provided per 1,000 head of population. Natural England is supportive of any initiatives to increase the provision of open and green spaces and the following comments may be of use to the Council. Natural England believes that local authorities should consider the provision of natural areas as part of a balanced policy to ensure that local communities have access to an appropriate mix of green-spaces providing for a range of recreational needs, of at least 2 hectares of accessible natural green-space per 1,000 population. This can be broken down by the following system: <ul style="list-style-type: none"> • No person should live more than 300 metres from their nearest area of natural green-space; • There should be at least one accessible 20 hectare site within 2 kilometres; • There should be one accessible 100 hectares site within 5 kilometres; • There should be one accessible 500 hectares site within 10 kilometres. This is recommended as a starting point for consideration by local authorities and can be used to assist with the identification of local targets and standards. Whilst this may be more difficult for some urban areas/authorities than other, Natural England would encourage local authorities to identify the most appropriate policy and response applicable to their Borough. This can assist the Council with identifying the needs of the local community and increase awareness of the value of accessible natural green-space, along with the levels of existing green-	Proposed Objective 5 (Open space/recreation) has been amended. In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policies LTC OS3 (Enhancing open space and biodiversity) and LTC OS4 (Nature Conservation) have therefore been deleted.

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			space provision, resources and constraints. The Council's aspiration to set aside 1.7 hectares per 1,000 head of population as an average of open space provision is welcomed and supported, if the above levels of open space provision can not be achieved. Env 2 - Sustainable Transport "To reduce dependency on private cars". Env 8 - Biodiversity "To value, protect and enhance biodiversity". Indicators for this objective includes areas of land actively managed, which is commended and to be encouraged, especially if these relate to agreed management plans and strategies for council owned areas/sites.	
180	DP9 on behalf of Land Securities	LTC OPP2	It is considered that the wording of the policy should be amended to state that the Council 'will seek' rather than 'require' proposals to accord with the requirements set out within the policy to ensure that other consideration can be taken into account when assessing proposals. The following changes are also proposed: Improve existing east west links across the site between Sundermead area to the retail and commercial core of the town centre v) Create a more welcoming environment to Molesworth Street; and Finally, it is not considered that vi) should remain within this policy, as such improvements are likely to be outside the application site boundary for proposals and would instead be secured through a Section 106 (or equivalent) Agreement. This is dealt with in the following paragraph.	Previously proposed OPP2 has been deleted. The newly proposed Character area Policy 6 (Central character area) addresses these comments.
181	DP9 on behalf of Land Securities	LTC OPP2	The following comments are made: -In response to the comments written regarding the public realm, point 1 is questioned as to how retail which faces onto the High Street, with a single point of entry onto this route can be considered to turn its back on the High Street. -The reference to 3/4 storey buildings is inappropriate, given the policy position elsewhere within the document. Preferred Option: it is considered that the reference to 'Molesworth Street Frontage' should be amended to encompass the whole environment to read 'Molesworth Street Environment'.	See above
182	DP9 on behalf of Land Securities	LTC OPP2	Analysis Lewisham Centre and Molesworth Street: It is unclear from this page as to the role of this assessment. Some bullet points relate to an assessment of the existing conditions, including strengths, weaknesses and opportunities within the town centre, but others provide detailed guidance on what might appropriate as part of redevelopment. For example, at Point 5 of Fronts, Enclosure, Scale and Grain reference is made to an 'urban market'. It is considered that this, and other, references are out of context with the exercise carried out within this section and should be removed. Notwithstanding this, within the following amendments are suggested to reflect the current situation and associated issues:- -Fronts, Enclosure, Scale and Grain - Point 1: '...Dead ground floor frontages, open vehicle ramps and car park above, all restricted by existing building structure and layout and...' Uses - 'The former Beatties building is redundant and offers and opportunity for a major stand alone unit or one integrated with the Lewisham Centre'	See above
183	DP9 on behalf of Land	LTC OPP2	Public Realm, Page 77: The number 7 shown on the diagram is incorrect.	See above

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	Securities			
184.	Environment Agency	LTC ENV1	<p>The baseline information is clear on the magnitude of flood risk in the Town centre but this information is not strongly reflected in the Sustainability Appraisal (SA). The SA identifies some conflict between the AAP objectives and Sustainability objectives but flood risk has not been identified as one of the significant negative effects on the plan policies. The SA for the Core Strategy found that one of the key conflicting issues is that the growth areas are largely sited in areas at risk of flooding and many of the proposed policies will have negative effects on flood risk. Policy Env1 will impact negatively on most of the themes. Strategic Flood Risk Assessment (SFRA) should inform the sustainability Appraisal. Housing allocations will have to draw from the findings of SFRA. Without such an assessment, the sustainability appraisal would be considered incomplete. The extent to which flooding might be an issue in the Town Centre, or how it might affect the area available for development, is not clear from the information available. For this reason part of then Area Action Plan (AAP) does not accord with the guidance in PPS12, that it is not founded on a robust and credible evidence base. It would therefore fail Soundness Tests 4 and 7. The Preferred Options documents, include detailed Site Allocations, made without reference to the SFRA or flood risk. The SFRA should inform the sequential based approach to the location of development within the Town Centre. We would recommend selecting of preferred options areas for residential development following the production of the Strategic Flood Risk Assessment. This may identify areas more suitable for residential development than those currently selected.</p>	<p>In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy ENV1 (Protect and enhance the environs of the rivers) has therefore been deleted.</p> <p>The SFRA, Core Strategy sequential testing and Sustainability Appraisal have all been used to inform the Further Options Report.</p>
185.	British Waterways London	GENERAL	<p>British Waterways is a public body set up under the Transport Act 1968 to manage, maintain and preserve the network of canals and other navigations. British Waterways does not own or manage any land or water within the Borough and therefore has no comments on the Preferred Options Part 2 Consultation or any other LDF consultation documents.</p>	Noted.
186.	DP9 on behalf of Land Securities	LTC ENV2	<p>The flood plain covers a significant part of the town centre, and for this reason it is considered that the wording of this policy should be more supportive towards development within the AAP area in order to achieve the objectives of the document. The wording should be related more to PPS25, which allows development on flood plains, subject to the sequential and exception tests.</p>	<p>In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy ENV2 (Flood Plains) has therefore been deleted.</p>
187.	Environment Agency	LTC ENV1	<p>Flooding has implications for the Borough not only in terms of the constraint it places on the location of new development but also as an issue which sits with other 'climate change' related matters. For this reason it is preferable to have both strategic and detailed policies. A detailed policy on flooding is placed within this AAP because of its significant spatial implications in the Opportunity Areas. This proposed Policy will deal with a wide range of actions to reduce flood risk and is</p>	<p>In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy ENV1 (Protect and enhance the environs of the rivers) has therefore been deleted.</p> <p>The SFRA, Core Strategy sequential testing and Sustainability</p>

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			<p>intentionally presented in a comprehensive manner to most clearly convey the Environment Agency and the Council's approach. A significant area of both Lewisham and Catford Town centres lies in the floodplains of the River Ravensbourne and its tributaries. The Environment Agency Thames Catchment Flood Management Plan (Thames CFMP) (September 2006) confirms the above and sets out some main messages:- a) Flood defences cannot be built to protect everything. b) Localised defences might be developed. c) The ongoing cycle of development and urban regeneration is a crucial opportunity to manage flood risk. d) Land for future flood risk management will be identified and protected by authorities. The Environment Agency is not objecting to the redevelopment of Lewisham town centre and is satisfied that development will not cause an increase in flood risk. A comprehensive approach to dealing with flooding and its risks has been followed to avoid adding to the risks to people and property and to seek to reduce the extent of flooding. A refined modelling submitted by the council and developers has removed a number of instabilities within the previous River Ravensbourne model which has improved its accuracy. This includes aspects such as a better demonstration of the way culverts respond to flood flows. Under the proposed scheme, the model shows that there is no raising or backing up of 1 in 100 year flood levels including an 20% allowance in peak river flows for climate change in the River Ravensbourne. There is a slight increase in water levels under the same scenario in the River Quaggy. However, there is sufficient freeboard (safety factor) from peak water levels to surrounding ground levels for us to be confident that flood risk is not increased as a result of the proposals. Removing the existing flood risk from people and property by relocating development is not always a realistic option because of the enormous costs and lack of alternative land outside the flood risk area. A sequential approach of ensuring new development is only in areas not at flood risk would on its own fail to deal with the risks faced by those already living or having businesses in flood risk areas. A pragmatic application of sequential approach to new development would realise the opportunity identified in the Thames CFMP and PPS25 to use development as a way to help manage and reduce flood risk. It would ensure that the continued role of the Town Centres in particular, as a sustainable and accessible location for many facilities including as major shopping centres, could be fully maintained to meet the needs of local residents. The proposed policy also seeks to ensure the capacity of the flood plain is both preserved, and, where possible, through appropriate development, increased and impedance to the flow of floodwater is, if possible, reduced. Redevelopment of existing developed sites in flood risk areas for less vulnerable uses will be supported where they achieve reductions in flood risk through increased flood storage capacity and reduced impedance to flood water flow. Account is taken in the policy of the impact of climate change by highly vulnerable uses not being permitted</p>	<p>Appraisal have all been used to inform the Further Options Report.</p>

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			in the 1 in 1000 (Zone 2) flood area and development in this area otherwise being required to be flood resistant/resilient. More stringent controls on development are made in the 1 in 20 flood risk area (Zone 3b) (referred to in PPS25 as 'functional flood plain') These are areas of generally fast flowing floodwater in major flood events where there are particular risks to people and property. All applications covered by the provisions of the policy will require an appropriate Flood Risk Assessment. This includes sites over 0.5ha, or 10 dwellings or more or over 1000 m2 of non-residential development outside the 1;1000 flood risk area in Zone 1 because surface water flooding into the flood plain from outside it can contribute to flood risk. The extent of the 1 in 20 (Zone 3b), 1 in 100 (Zone 3a) and 1 in 1000/ (100+20% for climate change) (Zone 2) where the SFRA will indicate.	
188.	Network Rail	LTC IMP6	Much of the document refers to improving links to Lewisham Station from the various development areas. With this in mind the intention to pool contributions for station enhancements referred to in LTC IMP6 – Transport Capacity is supported.	Previously proposed Policy LTC IMP6 (Transport Capacity) is deleted. However, the supporting text to proposed New Policy 3 identifies Network Rail as a partner and proposed Character Area Policy 3 (Connington Road) identifies improved access to Lewisham Station as a priority.
189.	DP9 on behalf of Land	LTC OPP2c	As slated above these changes are likely to be delivered in part through Section 106 Agreement monies, and cannot be delivered by one development alone.	Previously proposed Policy OPP2c has been omitted.
190.	Thames Water Property Services	GENERAL	Thank you for consulting Thames Water Utilities Ltd regarding the above. Thames Water Utilities Ltd (Thames Water) are the statutory water and sewerage undertaker for the Borough and are hence a "specific consultation body" in accordance with the Town & Country Planning (Local Development) Regulations 2004. A key sustainability objective for the preparation of the new Local Development Framework and AAPs should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 4.9 of the new PPS12,2004 states: "LPAs should ensure that delivery of housing & other strategic and regional requirements is not compromised by unrealistic expectations about the future availability of infrastructure, transportation and resources. Annex B sets out further guidance on resources, utilities and infrastructure provision". Paragraphs B3 to B8 of PPS12 place specific emphasis on the need to take account of infrastructure such as water supply and sewerage in preparing Local Development Documents. Paragraph B3 in particular states: "The provision of infrastructure is important in all major new developments. The capacity of existing infrastructure and the need for additional facilities should be taken into account in the preparation of all local development documents. Infrastructure here includes water supply and sewers, waste facilities...." To meet the test of "soundness" as set out in PPS 12 it is essential that the LDF does consider such water and sewerage infrastructure. In December 2005 The Planning Inspectorate published "Development Plans Examination – A Guide to the Process of	Noted. Justifying text to New Policy 3 includes reference to the proposed Lewisham Utilities Network, whose aim is to share information on proposed development and consequences for water, sewerage, electricity, gas and telecommunication services.

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			<p>Assessing the Soundness of Development Plan Documents". The Guide sets out a series of 'key questions and evidence requirements' at section 1.4 which aim to provide a framework for the assessment of soundness of DPDs. The most relevant key question under Conformity Test iv (a) is: "Key Question - Has adequate account been taken of the relationship between the proposals in the DPD and other requirements, such as those of utility companies and agencies providing services in the area including their future plans or strategy and any requirements for land and premises, which should be prepared in parallel?" A key source of evidence which is identified in answering this question is: " Evidence - Of particular significance, will be representations from bodies that consider that the DPD either does or does not have sufficient regard to other relevant strategies for which they are responsible". There are also a couple of relevant key sources of evidence identified in answering Coherence Test number (vii). The sources of evidence are: "If the DPD is an Area Action Plan, evidence may includeassessments of infrastructure."</p>	
191	Thames Water Property Services	GENERAL	<p>It will be essential that the AAP makes reference to the provision of adequate water and sewerage infrastructure to service development to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems. Therefore, if the AAP is to meet the "soundness" test, then it should include the following section on "Water Supply & Sewerage" as follows: " Developers will be required to demonstrate that there is adequate water supply and waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water and/or waste water infrastructure. Drainage on the site must maintain separation of foul and surface flows. For further information on both water supply and sewerage/ sewage treatment please contact Thames Water Utilities , Kew Business Centre on 0845 850 2777, www.developerservices.co.uk, email: developer.services@thameswater.co.uk. For Thames Water to provide these essential services most effectively, it is vital that developers and local authorities consult Thames Water at the earliest possible stage in any development proposal." It is considered that the above text accords with the guidance referred to above in PPS12 and the following: Policy 4A.13 of The London Plan, February 2004, relates specifically to water and sewerage infrastructure and states: "The Mayor expects developers and LPAs to work together with water supply and sewerage companies to enable the inspection, repair and replacement of water supply and sewerage infrastructure, if required, during the construction of development. The Mayor will work with Thames Water, the Environment Agency and other relevant organisations to ensure that London's</p>	<p>See above</p> <p>In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy.</p>

	Organisation	Policy	Comment	Response
			<p>drainage and sewerage infrastructure is sustainable." Policy 4A.11 of the London Plan relates to water supplies and states: "In determining planning applications, the Mayor will and boroughs should have proper regard to the impact of these proposals on water demand and existing capacity." With regard to surface water drainage, it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding and this should be clearly stated in the AAP. Thames Water recognises the environmental and economic benefits of surface water source control, and encourages its appropriate application, where it is to the overall benefit of our customers. However, it should be clearly recognised in the AAP that SUDS are not appropriate in all circumstances e.g. soakaways will not be appropriate in non free draining areas. In the disposal of surface water, Thames Water will, a) Seek to ensure that new connections to the public sewerage system do not pose an unacceptable threat of surcharge, flooding or pollution; b) Check the proposals are in line with Government advice which encourages, wherever practicable, disposal 'on site' without recourse to the public sewerage system; for example in the form of soakaways or infiltration areas on free draining soils; and c) Require the separation of foul and surface water sewerage on all new developments. We would also like to draw your attention to the following issues with regards to the draft AAP: Tree Strategy and Planting – Thames Water recognises the environmental benefits of trees and encourages the planting of them. However, the indiscriminate planting of trees and shrubs can cause serious damage to the public sewerage system and water supply infrastructure. In order for the public sewers and water supply network to operate satisfactorily, trees, and shrubs should not be planted over the route of the sewers or water pipes. Access – Thames Water will require 24 hour vehicular access to any pedestrianised area to undertake emergency works. Access to the sewerage and water supply infrastructure must not be impeded by street furniture. This will enable Thames Water to operate the network with as little interruption to the service as is possible. Catering Establishments - Thames Water would like Grease Traps to be installed in all catering establishments. These Traps must be regularly cleaned and maintained. Failure to enforce the effective use of grease traps will result in the build up of food deposits in sewers and drains. This can cause blockages and flooding resulting in emergency cleaning. These food deposits may also encourage the migration of rodents into the sewerage system and encourage their proliferation.</p>	
192.	Johanna Summers	LTC OPP3b	<p>Lee High road. I would like my view of the redevelopment of the old Hartwell Ford site, it is a really big site, Lewisham needs more supermarkets, the site would be ideal for Asda, loads of parking there, you state commercial shops what do mean?? Also what do you mean</p>	<p>Development has started on site. Previously proposed Policy OPP3b has been deleted.</p>

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			creation of new open spaces over the existing surface car park if spaces can be provided elsewhere. I am sorry I don't understand the council jargon, what are they saying. We need more shopping supermarket provision, Sainsbury's is ok, the parking is bad, in Lewisham, carrying a big shop is impossible, the site would really prosper from a good supermarket,	
193.	The Theatres Trust	LTC COM3	We note that Lewisham's leisure offer will be improved by the possibility of a cinema being introduced near the station but that arts and cultural facilities will not now play a part in the social regeneration of Lewisham town centre.	Noted.
194.	English Heritage	GENERAL	Thank you for your letters dated 17 August 2007 consulting English Heritage on the above document. Owing to the volume of work that is being generated by the introduction of the new planning arrangements and Strategic Environmental Assessment, we are finding it necessary to prioritise which consultations we are able to respond to. In broad terms, we are endeavouring to respond to consultations where we consider that there are likely to be significant implications for the historic environment. In our assessment the Lewisham has local historic environments of significance by virtue of the conservation areas and archaeological areas throughout the borough. The council's in-house conservation and archaeological advisers should be involved in discussion on the impacts of the plan's policies on these areas. Although we have not been able to provide a response at this stage, I must stress that this does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the document which is the subject of the consultation, and which may, despite the sustainability appraisal, have adverse effects on the historic environment.	Noted.
195.	Environment Agency	GENERAL	This relates to Sustainability Appraisal ENV 1 Flood risk should be divorced from climate change. Climate change considerations should be integrated into all spatial planning concerns, including transport, housing, economic growth and regeneration, water supply and waste management. It should be viewed from the wider sustainability objectives and not only reducing the impacts of flooding. Mitigation and adaptation should not be considered in isolation of each other, and opportunities for their integration in the development of spatial strategies, and their delivery, should be maximised. Consideration should be accorded to the area's vulnerability to climate change, using the most recent scenarios available from UKCIP and TE2100, and specifically the implications for built development, infrastructure and services and biodiversity. New development should be avoided in those areas with likely increased vulnerability to climate change, particularly where it is not viable to manage likely risks through suitable measures to provide resilience; and bring forward adaptation options for existing development in likely vulnerable areas. The council should require development proposals to take account of the expected changes in	The SA objectives for Lewisham Town Centre AAP were adapted to take the EA's comments into account. Objective ENV1 was amended to read: "To ensure Lewisham town centre is resilient to climate change by using mitigation and adaptation measures through sustainable design and construction." A separate new objective for flood risk created - ENV2,"to reduce the risks and effects of flooding". This therefore ensures that climate change and flood risk are considered separately as part of the sustainability appraisal process, which is particularly important given the location of the AAP area close to a network of rivers, and also ensures that climate change mitigation and adaptation are an important sustainability consideration in the emerging AAP.

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			<p>local climate conditions, throughout the proposed lifetime of the development, by adaptation or flexibility to allow future adaptation. Information on these measures must be submitted with an application. Specifically, the council should require major developments to:</p> <ul style="list-style-type: none"> • identify the type of and extent of the main changes expected in the local climate throughout the lifetime of the proposed development, • identify the potential impacts of these changes on the proposed development and its neighbours, • indicate the ways in which the proposed development design overcomes the hazards and exploits the opportunities associated with these impacts whilst meeting other sustainable development criteria, particularly the need to achieve overall reductions in greenhouse gas emissions <p>Annex A Most of the Town Centre development will occur on previously developed land. Therefore the importance of Brownfield sites should be within the scope of the Sustainability Appraisal. PPS23: Planning and Pollution Control, (Nov 2004) has changed the basis for dealing with land affected by contamination. It rests firmly on the precautionary principle. Where development is proposed on or near a site known or reasonably believed to be contaminated a site assessment will be required to establish the nature and extent of the contamination prior to determining the application. Development will not be permitted unless effective measures are taken to treat or control any contamination in order not to:</p> <ul style="list-style-type: none"> a) expose occupiers of the development land and neighbouring land to unacceptable risk; b) threaten the structural integrity of any building on or adjoining the site; c) contaminate any watercourse, waterbody or aquifer; d) cause the contamination of adjoining land or allow the contamination to continue. <p>Paras 23 and 24: 'The LPA should satisfy itself that the potential for contamination and any risks arising are properly assessed and that the development incorporates any necessary remediation and subsequent management measures to deal with unacceptable risks. Intending developers should be able to assure LPAs they have the expertise, or access to it, to make such assessments. Remediation must reduce the risk to acceptable levels, and make the site fit for proposed development. We would request the council to invoke this approach wherever it considers there might be a risk. Developers should take note of this requirement to know the potential for contamination and the need for initial site investigations and reassurance that the site will not cause pollution to water and soil. The indicator should be 'the number/ area of sites affected by contamination brought back into beneficial use'. Clarification will be required between the term 'contaminated land' which more accurately relates to land determined under Part IIa of the Environmental Protection Act 1990 by the Local Authority and 'land affected by contamination' or 'land contamination' which are the preferred terms for redevelopment situations.</p>	
196	Environment Agency		This relates to Sustainability Appraisal Policy Env6 The requirement to	See above

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			<p>achieve high levels of water efficiency is critical to all new and existing development. We would recommend inclusion of specific reference to water efficiency, water quality and water supply. New homes built to a 120 litres per head per day, or better, water efficiency standard will have a large positive impact on the supply-demand balance. If you are to proceed with high housing growth then water efficiency initiatives are vital to reduce people's daily water use and maintain a supply-demand balance We note that you have classified this as an activity and not an objective. This SA objective should be included. We suggest that this be strengthened to read ' to improve the quality of controlled waters'. Controlled waters include surface and groundwater, as defined by S.104 of the Water Resources Act 1991. Other objectives would include meeting requirements of the Water Framework Directive and promoting sustainable use of water resources. Additional Indicators may include: number of water efficient developments, use of water saving technology and number of new or improved Sites. Targets should include the following: All water bodies affected by the plan or programme achieve good status, compliance with river quality objectives, reduce diffuse pollution and eutrophication, reduce water use, reduce demand for water, increase/create riverside and water based opportunities for activities, increase by x% rod licence sales, create x km of access to waterways or footpath along waterways More new development will create higher volumes of sewage to be transported from houses to sewage treatment works, and additional treated effluent to discharge to surface and ground waters. In both cases the infrastructure should be sufficient to guarantee both surface and ground water quality would not be detrimentally affected, and avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property and pollution of land and watercourses The Water Framework Directive sets ecological standards in addition to chemical standards for rivers. This is likely to place greater demands on Sewage Treatment Works to achieve cleaner effluents. In preparing the Area Action Plan, the council must: i) ensure that the rate of development broadly accords with the capacity of existing water supply, sewage treatment and discharge systems, particularly in connection with major new development ii) require development to incorporate measures to enhance water efficiency, and sustainable drainage solutions iii) work with the Environment Agency and water companies to identify infrastructure needs and allocate areas for and permit necessary infrastructure</p>	
197	Environment Agency	GENERAL	<p>As noted in our response to the Core Strategy preferred options, flood risk is an integral part of the sustainability of new development. Decisions on development in the Opportunity Areas should be made in light of the findings of the forthcoming SFRA and flood risk Sequential Test and, where necessary, the Exception Test. The outcome of this may be that not all</p>	Noted.

	Organisation	Policy	Comment	Response
			development types will be appropriate in flood risk areas. Information on improving the flood performance of new buildings would be obtained from Flood resilient construction (Defra May 2007). This document aims to provide guidance to developers and designers on how to improve the resilience of new properties in low or residual flood risk areas by the use of suitable materials and construction details. These approaches are appropriate for areas where the probability of flooding is low (e.g. flood zone 1 as defined by PPS 25) or areas where flood risk management or mitigation measures have been put in place. Specifically this guidance document provides: <ul style="list-style-type: none"> • practical and easy-to-use guidance on the design and specification of new buildings (primarily housing) in low or residual flood risk areas in order to reduce the impacts of flooding • recommendations for the construction of flood resistant and resilient buildings More information on sustainable building would also be obtained from ' ' Planning Policies for Sustainable Building' ' - a Guidance to Local Development Frameworks (Local Government Association-Oct 2006). It recommends ways of integrating benchmarks for sustainable building into Local Development Frameworks. The report provides a set of suggestions and guidance, which reflect emerging and current good practice, and will help to deliver key policy objectives in areas such as energy, water and the use of materials.	
198.	DP9 on behalf of Land Securities	LTC URB1	The criteria set out under this policy are repetitive and should be revised. Furthermore, in order to achieve the objectives of Policy URB4, it is considered that the wording of Policy URB1 should be amended to give more favourable support for tall buildings, subject to the provisions set out within the policy.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC URB1 (Tall buildings in Lewisham Town Centre) has therefore been deleted.
199.	Government Office For London	LTC URB7	LTC URB7 (Enhancing Lewisham's waterways) - Suggest that you add a reference to PPS 25 here as well.	PPS25 is referred to in the reasons for selecting the preferred option, but it is not considered necessary to include a reference to PPS25 in the proposed draft policy itself.
200.	DP9 on behalf of Land Securities	LTC OPP2	The development framework plan includes entrances and routes through the site. However, these have not been the subject of any kind of testing to establish the best location for such entrances. Furthermore, no acknowledgment is made of the existing entrances to the Lewisham Centre that are provided by the retailers such as BHS and Marks and Spencer. These linkages should be clearly shown as indicative and subject to further work. An annotated version of the plan is attached to the representations. The estimated development capacity for the area is inconsistent with the retail floorspace stated in Policy LTC SH1 and is misleading in terms of the capacity for significant qualitative changes to this part of the centre.	Previously proposed OPP2 has been deleted. The newly proposed Character area Policy 6 (Central character area) addresses these comments.
201.	Government Office For London	GENERAL	The first chapter provides the context for the document, including linkages to the Core Strategy, Sustainability Appraisal and local strategies, which are welcomed. This is followed by detailing the vision, objectives and strategy for the town centre. You indicate that these will	Noted. The Further Options Report has been restructured in light of the progress made with the Core Strategy therefore potential links and cross cutting themes and their relationship with the town centre as a whole can potentially be drawn out

	Organisation	Policy	Comment	Response
			be implemented through a spatial land use planning framework developed using a set of themes, including creating a first class environment and developing a prosperous economy. A number of diagrams show how these themes cut across the town centre as a whole. This approach is welcomed though it would have been helpful to show how these issues related to each other throughout the town centre and whether that would cause any tensions/further issues.	further.
202.	Government Office For London	GENERAL	Throughout this document you make no reference to the evidence base in your Sustainability Appraisal. This is particularly noticeable in the justification of each preferred option and in the dismissal of others.	The reasons for selecting the preferred options refer to the Sustainability Appraisal.
203.	Government Office For London	GENERAL	You have taken the approach within this Preferred Options document of only putting forward one preferred option in draft policy format within each policy area. With this approach you will need to show through the evidence base that there is only one realistic option for each policy remaining at this stage; details of those options being rejected and the reasoning for this; and that you have not closed off other possible options which would have benefited from further consultation. In paragraph 1.2 of the Planning Inspectorate's Local Development Frameworks: Lessons Learnt Examining Development Plan Documents it says that "LPAs should be clear that they are not presenting a "draft plan" at preferred options stage".	Noted. The document articulates the alternate options considered and reasons for their rejection/selection of the progressed option. Note that the relevant Regulations have been amended since the Preferred Options stage.
204.	Government Office For London	GENERAL	Draft policies in chapter 3 are found under a range of thematic issues, including housing. It would be interesting to know why you did not continue the more spatial approach set out in the four themes in chapter 2. The draft policies, on the whole, appear to be locally specific which is very much in the spirit of the LDF, for example, LTC HSG1 (Meeting housing need) and LTC COM3 (Range of community, leisure and entertainment spaces), though there does appear to be some repetition of draft policies set out in your Development Policies and Site Allocations DPD which went out to consultation earlier this year - examples include Table 3.2. Parking Standards. Whilst we recognise that draft policies within this document are related more to town centre issues they can be more specific in their nature rather than being generic (as suggested in PPS12), for example LTC URb2 (Sustainability) to LTC URB6 (Public Realm). Some policies are also rather long, which can be construed as them being compounded in order to reduce the overall number of policies, for example LTC IMP3 (Lewisham town centre s106 pooling and priorities) and LTC URB2 (Sustainability). Some more detailed comments on these policies are set out in the attached Annex. Under the tests of Soundness this relates to test(vii).	Noted. In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. A large number of the previously proposed policies have therefore been deleted.
205.	Government Office For London	GENERAL	To help put the above policies into context, and hopefully as a result of this receive more meaningful responses, you do however list the options considered during the Issues and Options consultation stage of this document and comment on the responses received from this. A reasoned justification which considers national and regional policy and	Noted.

	Organisation	Policy	Comment	Response
			the Community Strategy (though not other local strategies) is also provided.	
206	Government Office For London	GENERAL	Chapter 5 covers the implementation framework for taking forward proposals within this document. We welcome the inclusion of the table which details the phasing and delivery partners for each site; and the table that provides an overview of the monitoring you consider should be undertaken as part of the implementation of the policies within this document. There are some issues, however, which we consider need to be addressed: -Have you secured funding to take forward the redevelopment of the six sites in both the short and long term? -The Lewisham Gateway site is subject to a planning application. Do you have any options for the redevelopment of the site if this is not approved or would it have some fundamental implications for you taking forward this document to adoption? -Have you started working with the appropriate partners/stakeholders who are necessary to take forward the redevelopment of the 6 sites? Are your preferred options flexible enough to amend some of the proposed redevelopment should you not have the buy-in from some/all of the stakeholders concerned and you are not be able to use compulsory purchase powers?	The Council's Infrastructure Delivery Plan, referred to in justifying text of new Policy 3, includes the Infrastructure Schedule that identifies delivery agencies, timescales, funding and contingency planning. A similar approach will be considered for the AAP itself. Consultation has continued with land owners.
207	Government Office For London	GENERAL	You have produced a Sustainability Appraisal and Strategic Environmental Assessment report for your Core Strategy. I understand that you are liaising with the Environment Agency regarding undertaking a Strategic Flood Risk Assessment. Will this be completed in time to feed into your evidence base before you proceed to submission?	SFRA now complete.
208	Government Office For London	GENERAL	On a more general point, the light print colour of the text and landscape format made this document more difficult to read.	Noted.
209	Government Office For London	LTC HSG4	LTC HSG4 (Affordable Housing) - Your preferred policy is to seek to secure 35% of new private residential build as affordable housing. London Plan policy 3A.8 says that "Boroughs should seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes". Given that the wording within this policy does not refer to the maximum reasonable, as set out in the London Plan, you would need to provide strong justification that this policy is the most appropriate to be delivered within your borough.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG4 (Affordable Housing) has therefore been deleted.
210	Laurent Duriaud	LTC HSG1	IN HOUSING: • Lewisham implementation body • Conflict positive In rented social housing stock Lessen target under the proposed alterations projected in the London Plan • Negotiation with developers: The preferred REASONS Board. In the scene : investment Programme (HIP), the Local Implementation Plan (LIP) and single Regeneration Budget (SRB) schemes, the Economic Development Plan informal Community Safety Plan. The Local Agenda • Property (£) Number of renting applying for homeless in temporary accommodation To increase the provision of connectivity to developed land as renewable objective with the powers of attraction, sustenance, digestion, repulsion, nutrition, growth and	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG1 (Meeting Housing Need).

	Organisation	Policy	Comment	Response
			formation and aim towards mathematical perfection OVER	
211	Government Office For London	LTC URB1	LTC URB1 (Tall buildings in Lewisham town centre) - This is largely repetitive of U16 in the draft Development Policies and Site Allocations DPD.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC URB1 (Tall buildings in Lewisham Town Centre) has therefore been deleted.
212	Government Office For London	LTC OPP0	Chapter 4 identifies six opportunity areas within the town centre which are aimed at enhancing its vitality and viability. By naming these 6 sites as opportunity areas will this cause confusion with those set out in the London Plan? The first draft policy in this chapter appears to be an overarching policy forming the basis for development proposals within the six opportunity areas. Each site is then considered in detail within this chapter, and we welcome in particular the inclusion of (i) a description of the existing area; (ii) an analysis, including the use of diagrams, depicting what you consider to be key issues of the sites; (iii) details of key objectives and opportunities; (iv) Issues and options covered at the Regulation 25 stage; and the reasons for the preferred option, including national and regional policies and the Community Strategy. However, no reference has been made to the accompanying Sustainability Appraisal and other local strategies in your reasons for taking forward your preferred option. Some more detailed comments with regards to the draft policies for the opportunity areas are set out in the attached Annex.	References to 'opportunity areas' have been replaced with 'character areas'. References have been included to Sustainability Appraisal.
213	Government Office For London	LTC TRS1	Table 3.2 (Lewisham town centre parking standards) - This appears to repeat those car parking standards set out in the draft Development Policies and Site Allocations DPD.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC TRS1 (Lewisham town centre parking standards) has therefore been deleted.
214	Government Office For London	LTC TRS5	LTC TRS5 (Travel Plans) - This largely duplicates policies set out in the draft Development Policies and Site Allocations DPD.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC TRS5 (Travel Plans) has therefore been deleted.
215	Government Office For London	LTC ENV2	LTC ENV2 (Flood Plains) - Would it be appropriate to cross reference this policy to PPS25 and/or SE4 on the draft Development Policies and Site Allocations DPD in relation to the application of the sequential test?	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy ENV2 (Flood Plains) has therefore been deleted.
216	Government Office For London	LTC COM2	LTC COM2 (A new secondary school for the town centre) - Is this a realistic option i.e. are you working closely with colleagues in your Council's education department to determine whether a school would be required during the lifetime of this document and that they would have the funding to take this forward?	It is proposed to amend this policy. Planning permission has now been granted for a new all-through school in the town centre.
217	Government Office For	LTC IMP2	LTC IMP2 (Compulsory Purchase Order powers) and LTC IMP3 (Lewisham	In line with Government guidance and to avoid repetition, the

	Organisation	Policy	Comment	Response
	London		town centre s106 pooling and priorities) - These appear to be covered by CP13 and CP14 in your draft Core Strategy.	AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC IMP2 (Compulsory Purchase Order powers) has therefore been deleted. However, reference is maintained in justifying text for proposed New Policy 3.
218	Government Office For London	LTC IMP3	LTC IMP2 (Compulsory Purchase Order powers) and LTC IMP3 (Lewisham town centre s106 pooling and priorities) - These appear to be covered by CP13 and CP14 in your draft Core Strategy.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC IMP2 (Compulsory Purchase Order powers) has therefore been deleted. However, reference is maintained in justifying text for proposed New Policy 3.
219	Government Office For London	LTC IMP4	LTC IMP4 (Partnership and consultation) - This repeats PPS12.	This previously proposed policy has been deleted.
220	Government Office For London	LTC OPP0	LTC OPP0 (Opportunity area policies) - Are you going to define what you mean, for the purposes of this document, by "general conformity".	This previously proposed policy has been deleted.
221	Government Office For London	LTC OPP1	LTC OPP1 (Lewisham Gateway opportunity areas) - What do you mean by "where reasonable" with regards to development contributions?	This previously proposed policy has been deleted.
222	Government Office For London	LTC OPP2b	LTC OPP2b (Urban form) and LTC OPP 2c (Public realm) - Do these repeat general policies set out in chapter 4?	Noted. These previously proposed policies have been deleted.
223	Government Office For London	LTC OPP2c	LTC OPP2b (Urban form) and LTC OPP 2c (Public realm) - Do these repeat general policies set out in chapter 4?	Noted. These previously proposed policies have been deleted.
224	Government Office For London	LTC HSG8	LTC HSG8 (Traveller's sites) - Circular 01/06 says that the Core Strategy should set out the criteria for the location of gypsy and traveller sites which will be used to guide the allocation of sites in the relevant DPD.	In line with Government guidance and to avoid repetition, the AAP will rely on policy contained in the London Plan and Core Strategy. The previously proposed Policy LTC HSG8 (Travellers Sites) has therefore been deleted.

Appendix 3

Audit of Issues, Options, Preferred Options and Policies

Table 1: Area-wide policies

Options	Preferred Option	Draft Policy	Preferred Option/Policy <ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	Notes <p>LP = Draft London Plan CS = Emerging Core Strategy</p>
Housing				
ISSUE LTC1: The Borough has a target of 9,750 additional dwellings to be built by 2016. How can housing need best be met in the town centre?				
LTC1A Have policies seeking to increase the density of residential uses (see issue LTC3)	The preferred option is an approach that combines elements of all three options to have policies which encourage high density residential uses [LTC1A], encourage the redevelopment or conversion of existing sites with residential uses as part of a mix [LTC1B] and also encourages new mixed use (to include residential units of varying size and tenure) development in the town centre, perhaps by the allocation of specific additional sites. [LTC1C].	LTC HSG1 - MEETING HOUSING NEED New development should, where possible, include residential uses at an appropriate density (see LTC HSG 6) to ensure land is being put to best use and assist in meeting the borough's housing target of 9,750 additional dwellings by 2016. It is estimated that mixed use development of key sites as identified in the Opportunity Area policies and on the Proposals Map will allow provision for approximately 4,100 additional homes. Table 1 outlines the estimated number of additional homes for each Opportunity Area.	Omitted	Not required as repetition of London Plan targets. Density is specified in CSP15. CSSP2 states 2,600 additional homes, not 4,100.
LTC1B Have policies encouraging the redevelopment or conversion of existing sites with residential uses as part of a mix (e.g. employment/ retail ground floor with residential above).		LTC HSG2 – MIXED USE DEVELOPMENT The Council will expect new development in the town centre to provide a mix of uses, including independent residential accommodation with separate access. Exceptions may be considered where it can be demonstrated that the site is not suitable to accommodate a mix of uses. Guidance for appropriate mix of uses for key development sites is provided in the Opportunity Area policies.	Omitted	Covered by CSP1 and London Plan LP3.3, LP4.2
LTC1C Promote new development in the town centre including residential uses as part of a mix of uses. This		LTC HSG3 – CONVERSION OF EXISTING BUILDINGS The Council will encourage the conversion of existing buildings such as vacant offices or premises above shops for residential purposes provided that: (a) a satisfactory living environment can be provided;	No change	LP makes reference to conversion of existing buildings (LP4.2), but there is a need to define a

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
could be achieved by the allocation of specific additional sites in the town centre to include some residential development of varying size and tenure.		(b) there is no conflict with existing land uses; and (c) the proposal complies with policy LTC EMP2.	<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	LP = Draft London Plan CS = Emerging Core Strategy Lewisham Town Centre specific criteria-based policy in the context of the importance of employment uses as emphasised in consultation feedback.
ISSUE LTC2: The Council will seek to deliver and exceed an additional 9,750 homes to be built by 2016, of which 3,160 will be affordable housing. Should there be a specific town centre affordable housing policy?				
LTC2A No specific affordable housing policy is required for Lewisham town centre, and a Borough wide affordable housing policy should be adhered to.	The preferred option for this issue is closest to LTC2A, to provide no specific affordable housing policy for Lewisham town centre, with adherence to the Borough wide affordable housing policy by default. In addition to affordable housing, the preferred option encourages provision of a policy on dwelling mix.	LTC HSG4 – AFFORDABLE HOUSING Where a development site is capable of accommodating 10 or more dwellings or is 0.3 hectares or more, the Council will seek to secure 35% of new residential build as affordable housing. The required affordable housing tenure mix will be 70% social rented and 30% intermediate provision delivered across private sites.	Omitted	Repetition of Core Strategy and London Plan policies: CSP1 / LP3.12, LP3.13 and LP3.14 CSP1 – starting point for negotiation = 50% affordable.
LTC2B A policy which takes a more flexible approach to the provision of affordable housing in Lewisham town centre in terms of size, tenure, location and quantity of provision. This may result in the delivery of fewer affordable homes than option LTC2A.		Developers would be required to demonstrate a mechanism for retaining affordable housing in perpetuity. LTC HSG5 – DWELLING MIX The Council will expect new housing development on proposals for 10 units or more to provide a full mix of dwelling type and sizes, including family units. A family unit is considered to consist of 3 or more bedrooms and include a directly accessible, private amenity space of appropriate size. The degree of the housing mix for any given site will depend on local circumstances and site characteristics. The Council will encourage innovative and imaginative solutions to dwelling mix and provision of	Omitted	Both are repetition of London Plan and Core Strategy and there is no evidence for a town centre specific approach
LTC2C				

Options	Preferred Option	Draft Policy	Preferred Option/Policy <ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	Notes LP = Draft London Plan CS = Emerging Core Strategy
A policy approach which seeks to deliver a higher proportion of affordable housing in Lewisham town centre. This may result in the delivery of more affordable homes than option LTC2A.		outdoor amenity space.		
ISSUE LTC3: How best can the AAP process promote higher residential densities in areas of high public transport accessibility?				
LTC3A Retain existing Sustainable Living Area (SLA) approach (as defined in the existing UDP).	The preferred option is a combination of all three options; to bring forward an approach that seeks higher densities in a sustainable location (similar to the SLA approach of the current UDP) and also to support car-free housing where appropriate and to consider the removal of rights to on-street parking permits for occupiers of new residential developments.	LTC HSG6 – HOUSING DENSITY The Council will expect housing densities of new development to be appropriate to the local setting in terms of existing building form, massing and character. For guidance, the Council will consider Lewisham Town Centre a ‘Central’ setting when referring to the London Plan Density Matrix (Table 4B.1, London Plan, 2004).	Omitted	CSP15 states that LTC must be considered as ‘Central’ in relation to LP table 3.2 under Policy 3.4
LTC3B Promote car-free housing.		LTC HSG7 – A RESTRICTIVE APPROACH TO RESIDENTIAL PARKING Within Lewisham Town Centre, the Council will promote car-free housing. As a starting point in negotiation with developers, the Council will seek not to issue new on-street parking permits for inhabitants of new residential development. Exceptions may be made for people with disabilities and mobility problems.	Omitted	CSP14 / LP6.1 provide appropriate standards
LTC3C Consider the removal of rights to street parking permits for occupiers of new residential developments.				
ISSUE LTC4: How should the AAP make provision for the traveller community?				
LTC4A	The preferred option is	LTC HSG8 – TRAVELLERS’ SITES	Omitted	CSP2 identifies a

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>Identify and allocate a traveller site within Lewisham town centre.</p> <p>LTC4B Identify and allocate a traveller site outside Lewisham town centre.</p> <p>LTC4C Include a criteria based policy in order to provide a framework to assess the suitability of new proposals.</p>	<p>option LTC4C which states that criteria based policy should be included within the AAP in order to provide a framework to assess the suitability of new proposals.</p>	<p>There are no identified travellers' sites within the Lewisham Town Centre. However, if proposed within the town centre, gypsy and travellers' sites will be assessed against the following criteria:</p> <p>(a) it is accessible to local shops, services and community facilities in particular schools and health services;</p> <p>(b) it has safe and convenient access to the road network;</p> <p>(c) it has provision for parking, turning, service and emergency vehicles and servicing of vehicles;</p> <p>(d) the activities do not have an adverse impact on the safety and amenity of occupants and their children and neighbouring residents particularly in terms of noise and overlooking, and other disturbance from the movement of vehicles to and from the site;</p> <p>(e) it has a supply of essential services such as water, sewerage and drainage and waste disposal; and</p> <p>(f) it is designed and landscaped to a high standard.</p>	<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	<p>LP = Draft London Plan CS = Emerging Core Strategy</p> <p>policy approach and sites are to be identified for this use through the Site Allocations process.</p>
OTHER POLICIES		<p>LTC HSG9 – RESIDENTIAL STANDARDS Proposals for residential development should provide an acceptable standard of accommodation in accordance with Council's Supplementary Planning Document "Residential Development Standards", June 2006.</p>	Omitted	Repetition of LP Policy 3.6 and SPD
Shopping and Town Centre				
ISSUE LTC 5: How can Lewisham town centre best move towards Metropolitan Centre status?				

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>LTC5A Rely on existing site allocations for new retail development in the town and determine applications for additional retail developments on their merits.</p>	<p>Option LTC5B is the preferred option.</p>	<p>LTC SH1 – LEWISHAM TOWN CENTRE The Council will seek to increase the amount of retail floorspace, in particular comparison floorspace, to support Lewisham’s move from a Major Centre to a Metropolitan Centre. Approximately 43,000m2 of additional food and non food retail floorspace is anticipated to be provided within the short to long term mixed use development of the following site allocations:</p> <p>(a) Lewisham Gateway (b) Lewisham Centre and land south of Lewisham Centre (c) Lee High Road – western and eastern ends (d) Loampit Vale (e) Conington Road - Tesco block (f) Engate Street</p>	<p>Omitted</p>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p> <p>CSSP2 covers this strategic target. Although policy is not required, site specific character area policies incorporate broad capacities for implementation purposes</p>
<p>LTC5B Allocate new sites for retail development with regard to the retail capacity study in order to plan for and accommodate identified retail capacity to help the town centre move toward the floorspace required to achieve Metropolitan Status (100,000sqm).</p>				
<p>ISSUE LTC6: How can Lewisham town centre’s vitality and viability be best supported?</p>				
<p>LTC6A Public realm enhancements</p>	<p>It is considered that in order to promote the vitality and viability of Lewisham town centre, a combination of all options would prove most effective. The draft policies also recognise the</p>	<p>LTC SH2 – VITALITY AND VIABILITY Development should sustain and enhance the vitality and viability of the town centre in the context of the strategic development of Lewisham Gateway. To ensure this, the Council will encourage the following: (a) Implementation of Lewisham Gateway proposals (see Core Strategy Strategic Site Allocations Policy 6) (b) Public realm enhancements (see LTC URB6);</p>	<p>Retained with amendment</p>	<p>There is a clear need for specific policies that focuses on the vitality and viability of the town centre and the market as an extension of CSSP2. Minor amendments and additions to</p>
<p>LTC6B Encourage new development on the Lewisham Gateway site to raise profile of town centre as a whole</p>				

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>LTC6C Support a greater mix of uses including cafés, bars and other evening economy uses to support vitality of retail offer</p>	<p>importance of the market in supporting the vitality and viability of the market.</p>	<p>(c) Retail and mixed use allocations on key development sites (LTC URB4); (d) A greater mix of uses including cafés, bars and other evening economy uses to support vitality of retail offer (see LTC SH8); (e) Incorporation of design principles such as a mix of uses, active frontages and effective street lighting with a view to making the town centre a safer place (see LTC URB4, LTC URB5 and LTC URB6); (f) Shopfront improvements and funding programmes (see shopfront Supplementary Planning Document); and (g) A greater component of residential development within the town centre within the overall mix of uses (see LTC HSG1 and LTC HSG2 LTC COM1 and LTC BOM2).</p> <p>LTC SH3 – LEWISHAM MARKET The Council will continue to promote Lewisham Market as an essential part of the retail centre and encourage ancillary facilities in order to maintain its viability. The Council will investigate, in consultation with market traders, retailers and other town centre stakeholders, ways in which the Market can be improved, including the temporary use of the Market space for alternative activities (e.g. street food stalls or informal leisure activities) in the evenings and other times when the Market is not in use.</p>	<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy <p style="text-align: center;">Retained with amendment</p>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p> <p>ensure policy is comprehensive.</p>
<p>LTC6D Make Lewisham a safer place</p>				
<p>LTC6E Support shopfront improvements and funding programmes</p>				
<p>LTC6F Allocate new sites for retail development</p>				
<p>LTC6G Encourage a greater mix of uses within the town centre including residential development (see LTC1)</p>				
<p>LTC6H Redevelop at key locations within the High Street to provide marker buildings with mix of uses.</p>				
<p>ISSUE LTC7: If implemented Lewisham Gateway has the potential to bring wide ranging benefits to the town centre. How should the AAP address the issues associated with Lewisham Gateway?</p>				

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>LTC7A Allocate the Lewisham Gateway site for high density mixed use development.</p>	<p>It is considered that a combination of options LTC7A, C and D should be used to address the issues associated with Lewisham Gateway.</p>	<p>LTC SH4 – IMPACT OF LEWISHAM GATEWAY ON SOUTHERN PART OF THE TOWN CENTRE In order to address the change in the centre of gravity that is likely to result from the Lewisham Gateway development the Council will promote the creation of a secondary focus of activity at the southern end of the pedestrianised High Street, incorporating a mix of uses.</p>	<p>Omitted</p>	<p>LP = Draft London Plan CS = Emerging Core Strategy CSP6 and CSSP2 provide a general indication of the need to maintain vitality and viability in relation to the town centre and retail frontages. LTC SH4 promotes a strategic response to the Gateway proposals and has incorporated within a re-cast SH2.</p>
<p>LTC7B Rely on existing development site allocations in the UDP to facilitate redevelopment of the roundabout site.</p>				
<p>LTC7C Identify and allocate sites in the southern part of the centre for redevelopment in order to seek to address the change in the centre of gravity that is likely to result from the Lewisham Gateway development.</p>				
<p>LTC7D Consider whether the southern part of the High Street and shopping centre could develop a new role to complement the prime retail. This role might be a focus for community activity, with the library</p>				

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
representing an obvious stimulus for this type of activity. An alternative focus would be evening economy uses.			<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	LP = Draft London Plan CS = Emerging Core Strategy
ISSUE LTC8: What approach should the AAP take to the designations of core and non-core shopping frontages?				
<p>LTC8A Maintain current distinction between core and non-core frontages as currently on the proposals map.</p>	<p>The preferred option for the approach to the designation of core and non-core shopping frontages in Lewisham town centre is derived from options LTC8B and C.</p>	<p>LTC SH5 – CORE PRIMARY SHOPPING AREAS Within the Core Shopping Areas, as defined on the Proposals Map and indicated in Figure 4.3, the Council will strongly resist any change of use involving the loss at ground floor level of Class A1 shops. The following factors will be taken into account when considering exceptions:</p> <p>(a) Whether the proposal harms the retail character of the shopping frontage, with an over-concentration of non-retail uses (normally 3 consecutive non A1 uses and 70% maintained in A1 use); (b) Whether the proposal will generate a significant number of pedestrian visits; and (c) Whether the proposal uses vacant units (having regard both to their number within the centre as a whole and the Core Area and the length of time they have been vacant).</p> <p>All proposals for non retail development within Core Areas, including where relevant changes of use, should:</p> <p>(d) Not harm the amenity of adjoining properties, including that created by noise and disturbance, smell, litter and incompatible opening hours (all of which may be controlled by appropriate conditions); and (e) Where appropriate, provide attractive display windows</p>	<p>Retained with amendment</p>	<p>Renamed Primary Shopping Areas. Para 6.93 of the Core Strategy confirms the Council's intention to identify primary and secondary shopping areas. Table 4.2 identifies current primary and secondary frontages in Lewisham town.</p> <p>CSP6 identifies the intention to designate primary and secondary areas.</p>
<p>LTC8B Review existing allocation of core and non core frontages</p>				
<p>LTC8C Introduce a geographical basis for designating retail zones with scope for integrating a more diverse mix of uses including evening economy.</p>				
<p>LTC8D Remove shopping frontage allocations and rely on town centre boundary.</p>				

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
		<p>and entrances that are compatible with adjoining shop units.</p> <p>LTC SH6 – NON-CORE SECONDARY SHOPPING AREAS Within the Non Core Shopping Areas, as defined on the Proposals Map, and indicated in Figure 13 4, proposals for development or change of use from an A1 shop will generally be acceptable provided:</p> <p>(a) It is to another A use class, community use or amusement centre where such a change does not result in an over-concentration of non A1 uses (normally 3 non A1 uses);</p> <p>(b) It does not harm the amenity of adjoining properties;</p> <p>(c) It does not harm the retail character (with reference to Policy LTC SH7), attractiveness, vitality and viability of the centre including unreasonably reducing the percentage of A1 units; and</p> <p>(d) It is considered appropriate in relation to the area’s specific retail character.</p> <p>LTC SH7 – RETAIL CHARACTER AREAS The town centre benefits areas of discrete retail character which, individually and collectively contribute positively to the vitality and viability of the centre. There are also areas where major retail led developments are anticipated and the retail character that they create will be an important consideration. Development proposals should take account of, not compromise and seek to complement existing and anticipated retail character of specific parts of the town centre as follows:</p>	<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy <p>Retained with amendment</p> <p>Retained with amendment</p>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p> <p>Renamed Secondary Shopping Areas (see above)</p> <p>LTC SH7 provides a useful bridging point between area wide retail / vitality policies and guidance for individual character areas</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
		<p>1. Lewisham Gateway The retail character that should be aspired to in this area is a mixture of retail and leisure uses. Creation of an open space at the confluence of rivers provides opportunity for cafes, bars and similar uses.</p> <p>2. Lee High Road The western end of Lee High Road is a mixed use traditional high street with retail (A1 & A3) at ground floor and flatted accommodation above. Retailing on Lee High Road has a strong independent character and frontages are relatively short. There are already high concentrations of take-away and other non-retail uses and care will need to be taken to ensure over concentrations are not established.</p> <p>3. Loampit Vale North The retail character that should be aspired to at this 'edge of centre' location is for large retail units, with parking, to support primary shopping.</p> <p>4. Ladywell Road Ladywell is a mixed area with a good range of secondary retailing providing everyday servicing needs of the local area. Most commercial premises have shopfronts of traditional character. Ladywell Road is more residential in character, with several community uses and a limited number of commercial uses.</p>	<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	<p>LP = Draft London Plan CS = Emerging Core Strategy</p>
ISSUE LTC9: How should the town centre's potential for a more vibrant evening economy be managed?				
LTC9A	The preferred option for	LTC SH8 – CRITERIA FOR EVENING ECONOMY USES	Retained with amendment	Specific principles for

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>Do not provide a specific town centre policy approach.</p> <p>LTC9B Maintain existing core and non-core frontage approach.</p> <p>LTC9C Encourage evening economy uses as part of a mix of uses in specified locations.</p> <p>LTC9D Concentrate evening economy uses in a particular zone.</p>	<p>the approach to managing the town centre's potential for a more vibrant evening economy is derived from options LTC9C and D</p>	<p>The Council will encourage proposals for new uses that would positively contribute to the evening economy of the town centre where the following criteria are met:</p> <p>(a) The retail character of the area is not harmed (with reference to LTC SH8 7), and in particular the retail character of the core shopping area;</p> <p>(b) The proposal would contribute positively to the character of the particular area, as outlined in the LTC SH8 7; and</p> <p>(c) The cumulative impact of the proposal does not unreasonably harm the living conditions of nearby residents, including that created by noise and disturbance from users and their vehicles, smell, litter and unneighbourly opening hours.</p> <p>It is considered that the following areas would be suitable locations for evening economy uses, as part of a wider mix of uses:</p> <p>(a) Lewisham Gateway (b) Lewisham High Street between Limes Grove and Morley Road (c) Ladywell (d) Lee High Road</p>	<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	<p>LP = Draft London Plan CS = Emerging Core Strategy</p> <p>evening economy uses is required for the town centre to expand upon general policy guidance</p>
ISSUE LTC10: Should the town centre boundary be altered?				
<p>LTC10A Maintain existing town centre boundary</p> <p>LTC10B Review town centre boundary to achieve a</p>	<p>The preferred option is LTC10B with the removal of areas LTC10B(iii) and LTC10B(iv) from the town centre boundary.</p>	<p>LTC SH9 - TOWN CENTRE BOUNDARY</p> <p>The AAP boundary is defined as set out in the following plan (see main document):</p>	<p>No change</p>	<p>AAP requires clear definition of town centre boundary</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>tighter core by removing one or more of the following options:</p> <p>LTC10Bi) North-west corner of the town centre west of the DLR and north of the railway. The area around Armoury Road is former industrial land that was comprehensively redeveloped for housing in the 1980's. The area benefits from very good levels of public transport accessibility being within walking distance (via a railway arch opposite Jerrard Street) to Lewisham mainline and DLR stations and the numerous associated bus routes and Elverson Road DLR station.</p> <p>LTC10Bii) Conington Road area east of the DLR and north of the railway. This mixed-use area is</p>	<p>These areas are predominantly residential and therefore are considered not to contribute positively to the centre's vitality and viability. As such the removal of the two areas will result in a tighter, more logical and defensible town centre boundary.</p>		<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	<p>LP = Draft London Plan CS = Emerging Core Strategy</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy <ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	Notes <p>LP = Draft London Plan CS = Emerging Core Strategy</p>
<p>occupied by a large Tesco store and associated decked and surface car park, some industrial units on the east side of Conington Road and established residential housing blocks to the west. The area benefits from very good levels of public transport accessibility being within walking distance to Lewisham mainline and DLR stations and the numerous associated bus routes and Elverson Road DLR station.</p> <p>LTC10Biii) Area around Caterham and Boyne Roads, south of railway and north of Lee High Road. This established residential area is immediately to the east of the new divisional police station and to the north of the secondary shopping facilities along Lee High</p>				

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<p>Road. The area falls within the Blackheath Conservation Area.</p> <p>LTC10Biv) Limes Grove Area – This established residential area lies on the immediate eastern side of Lewisham High Street north of the railway line.</p> <p>LTC10Bv) Southern end of the High Street south of the railway, towards Ladywell. The character and feel of the town centre changes south of the railway as one approaches Ladywell. This is a mixed part of town with the High Street presenting a range of secondary retail services together with the Ladywell Leisure Centre to the south. A large Council depot occupies land immediately to the south</p>				

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<p>of the converging railway lines. The depot is accessed through an area of established and mixed Edwardian housing. At the southern extreme of the town centre is the St. Mary's centre.</p> <p>LTC10Bvi) Jerrard Street, Loampit Vale and Elmira Street area – this is the large and varied area with a wide range of land uses. Large scale retail warehousing units dominate the north side of Loampit Vale together with some small scale employment uses. The Sundermead housing estate is undergoing a phased comprehensive redevelopment on the south of Loampit Vale where Lewisham Bridge Primary School is also located. Generally the area is well located to benefit from the good</p>				

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
levels of public transport accessibility provided by Lewisham Station.			<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	LP = Draft London Plan CS = Emerging Core Strategy
Urban Design				
ISSUE LTC11: What approach should be taken to the location and design of tall buildings in Lewisham town centre?				
LTC11A Retain exiting approach whereby tall buildings are considered appropriate in Lewisham town centre if the site is covered by a development brief identifying it as such.	Tall buildings are a useful way to achieving high densities, however it is important that their siting is managed effectively and that the highest quality architecture is emphasised, therefore the preferred option is a combination of options LTC11A and D. Where a site is not covered by a development brief which identifies it as a suitable location for tall buildings [LTC11A] the council should set out the specific criteria against which all developments for tall buildings will be considered [option LTC11D].	LTC URB1 – TALL BUILDINGS IN LEWISHAM TOWN CENTRE Planning applications for tall buildings may be permitted in Lewisham Town Centre subject to assessment of the following factors: (a) Design of tall buildings should be of the highest architectural quality; (b) The degree to which the proposal makes a positive response to urban setting and townscape; (c) Transport accessibility and impact of the proposal; (d) The visual impact of the proposed development on Strategic and Local views; (e) Effect on Listed Buildings themselves and the setting of Conservation Areas; (f) Effect on Metropolitan Open Land and other open spaces; (g) Relationship to existing tall buildings and structures; (h) Relationship with the town centre's topography; and (i) Impact on microclimate and overshadowing. All development applications for tall buildings must be accompanied by: (a) an environmental impact assessment; and (b) a design and access statement.	Omitted	CSP18 identifies Lewisham TC as a place where tall buildings will be directed to and sets out design criteria. The emerging proposals plan highlights local landmarks which are relevant in terms of views and legibility.
LTC11B Seek generally to encourage tall buildings in the town centre, removing the requirement for development brief endorsement.				
LTC11C Seek to encourage tall buildings in specific location(s).				
LTC11D Set out criteria against which all development for tall buildings will be considered, including				

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
		<p>Design competitions and partnership working will be encouraged to promote high quality design, particularly on key sites promoted through the opportunity area policies.</p> <p>LTC URB4 – MIXED USE An appropriate mix of compatible land uses will be encouraged both vertically and horizontally in Lewisham Town Centre. In particular, high density residential development above ground floor retail and commercial uses will be encouraged. Wherever possible, new development should be designed to accommodate active uses at ground floor level, with significant amount of window display and entrances.</p> <p>LTC URB5 - URBAN ENCLOSURE, GRAIN Urban enclosure and urban grain play a critical role in creating good quality environments and the following principles should be considered in any proposals for development:</p> <p>(a) Public spaces should be strongly defined by the built edges that surround them and groups of building should be designed to form unified urban 'backdrops'. (b) Existing street patterns should be respected and where possible extended in areas of new development. Single-use and overly long blocks should be avoided. (c) Buildings should front public spaces, and on major streets and public spaces 'backs' of properties should be avoided wherever possible.</p> <p>LTC URB6 - PUBLIC REALM Public spaces in Lewisham should be designed to be attractive, safe and robust through consideration of the following factors:</p> <p>(a) Unnecessary street clutter should be avoided, and where it is useful and functional, street furniture and lighting should be designed to delight. (b) The provision of public art in association with all major development in the town centre will be encouraged and should be considered at the early stages of the design process.</p>	<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy <p>No change</p> <p>No change</p> <p>Retained with minor amendment</p>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p> <p>Specific guidance required for town centre</p> <p>Specific guidance required for town centre</p> <p>Specific guidance required – minor amendments incorporated</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
		<p>(c) Development should enhance community safety through the overlooking of entrances and exits and clear definition of public and private space. Developers should show how they have taken 'Secure by Design' into account with a view to 'designing out' crime.</p> <p>(d) New development and public space improvements should be designed to improve connections into and through the town centre, particularly for pedestrians, and where possible, create new public routes. Enhancements to connections between the town centre and surrounding residential communities are particularly important.</p> <p>(e) The Council will promote opportunities to make innovative use of existing and additional public realm areas as publicly accessible open space that can be used for recreation purposes and events and footways and civic spaces need to be generously sized, designed and managed accordingly.</p> <p>(f) Development should ensure that the public realm and development projects incorporate inclusive design principles. The Council will also seek to make provision for shopmobility initiatives.</p> <p>LTC URB7 – ENHANCING LEWISHAM'S WATERWAYS In close liaison with the Environment Agency, new development in close proximity to the rivers should be designed to address the river positively, to create attractive waterfront environments, to respect and enhance natural habitats and to accommodate appropriate flood defences and should contribute to the physical environmental improvement of the river corridors.</p> <p>The Council will seek to protect and enhance the environs of the River Quaggy and the River 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, in terms of public amenity and environmental quality, the provision of natural habitats, enhancement of biodiversity and the provision of effective flood defences. Where appropriate,</p>	<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy <p>New Policy</p>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p> <p>Specific guidance required – minor amendments incorporated</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
	<p>the Council will support the de-culverting of rivers and programmes of naturalisation of riparian environments. Proposals should also respond positively to waterway heritage.</p> <p>The Council will seek to safeguard Waterlink Way, identify opportunities to improve the continuity of the route through the town centre, and will be proactive in obtaining agreements from relevant landowners in consultation with the Environment Agency.</p> <p>The Council will also encourage the celebration of the confluence of the River Quaggy and River Ravensbourne within the redevelopment of the Lewisham Gateway site. Proposals which promote the creation of a Confluence Park will be encouraged including proposals for a new avenue linking Conington Road Area to the new Confluence Park as shown in Figure 3.</p>		<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	<p>LP = Draft London Plan CS = Emerging Core Strategy</p>

Employment and Business

ISSUE LTC12: What policy approach should be taken to existing established industrial areas and business uses in the town centre?

<p>LTC12A Seek to retain existing employment uses in Lewisham town centre.</p>	<p>The preferred option for employment land is a balanced approach which incorporates all options. This will allow for the protection of existing office and employment uses whilst being in line with government guidance and promoting the best use of land.</p>	<p>LTC EMP1 – EMPLOYMENT USES IN LEWISHAM TOWN CENTRE In general, the Council will seek to retain existing employment uses in the town centre (uses falling within the category of Use Class B). However, In recognition of the opportunity to enhance vitality and viability of the town centre, the Council will consider redevelopment or conversion of the following employment sites for a mix of uses, including residential. It is envisaged that redevelopment proposals will enable the intensification of sites and as such there is an opportunity to re-provide employment floorspace as part of a wider mix of uses, including residential. Employment sites which will be considered for redevelopment include the following:</p>	<p>Retained with minor amendment</p>	<p>Important to keep this policy with minor amendments to reflect a more proactive statement of support for employment uses. Core Strategy Policy 2 identifies Molesworth Street as a Local Employment Location Core Strategy Policy 3 seeks to protect</p>
<p>LTC12B Seek to release land from specific employment allocations in order to promote redevelopment and seek to make the best use of land through mixed use schemes.</p>				
<p>LTC12C Seek to protect existing</p>				

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>office provision within the town centre and continue to identify Lewisham as the most appropriate location for new office development.</p> <p>LTC12D Seek to encourage the conversion of town centre accommodation to residential use.</p>		<p>(a) Former Beatties building (offices over ground floor retail); (b) Engate Street; (c) Thurston Road and Jerrard Street; (d) Conington Road; and (e) Citibank Tower.</p> <p>The conversion of other existing employment sites to a mix of uses including residential may be considered acceptable where:</p> <p>(a) the building has been vacant for at least 18 months 2 years and appropriately marketed for that length of time, and evidence is provided to this effect; and (b) the scheme will considerably assist in meeting other regeneration objectives such as:</p> <ul style="list-style-type: none"> - improvement to the vitality and viability of the town centre; - meeting the Borough's housing priority needs; and/or - the provision of community and leisure facilities within an accessible and socially inclusive location. <p>(c) The design is capable of longer term adaptation.</p> <p>LTC EMP2 – OFFICE USES IN LEWISHAM TOWN CENTRE Lewisham Town Centre is the preferred location for large scale office development in the Borough and the Council will seek to promote new office development where</p>	<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy <p>Retained with minor amendment</p>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p> <p>Local Employment Locations</p> <p>Core Strategy Policy 5(2) seeks to retain employment land in town centres which could contribute to a cluster of commercial and business uses</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes	
		appropriate. The Council will resist the loss of office space in the town centre with reference to the criteria identified in LTC EMP1. Where redevelopment entails the loss of office uses, proposals will be encouraged to re-provide this office space in a modern format.	<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	LP = Draft London Plan CS = Emerging Core Strategy	
Open Space					
LTC13: How should the AAP process seek to address open space provision within Lewisham town centre?					
LTC13A Retain existing open space provision.	All options are seen to have a role to play in ensuring the provision of high quality open space in Lewisham town centre and the preferred option is therefore a combination of these options.	LTC OS1 – RETENTION OF METROPOLITAN OPEN LAND In general, the open character of Metropolitan Open Land (MOL) will be protected. In exceptional circumstances such as those relating to Lewisham Gateway, the Council will consider the re-provision of and alteration to the boundary of MOL where the regenerative benefits arising will make a significant positive contribution to the quality of MOL and the vitality of Lewisham town centre in the context of its sub-regional status in the town centre network and the aspiration to attain Metropolitan status.	Omitted	LP and CS12 provide satisfactory general policy context.	
LTC13B Improve the quality of open space provision.		LTC OS2 – WATERLINK WAY AND CELEBRATING THE RIVER CONFLUENCE The Council will seek to safeguard Waterlink Way, identify opportunities to improve the continuity of the route through the town centre, and will be proactive in obtaining agreements from relevant landowners in consultation with the Environment Agency.	Omitted	Repetition of Core Strategy Policy 12)	
LTC13C Improve accessibility to existing provision.					
LTC13D Ensure new development provides essential amenity space in high density developments.					

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
		<p>The Council will also encourage the celebration of the confluence of the River Quaggy and River Ravensbourne within the redevelopment of the Lewisham Gateway site. Proposals which promote the creation of a Confluence Park will be encouraged including proposals for a new avenue linking Conington Road Area to the new Confluence Park as shown in Figure 15.</p> <p>LTC OS3 – ENHANCING OPEN SPACE AND BIODIVERSITY The Council will seek to protect and enhance the quality, biodiversity and accessibility of existing and new open space provision in Lewisham Town Centre including those which form part of the Waterlink Way. In addition to formal open spaces, the Council also promotes the value of green and brown roofs and ‘wildspace’ projects in providing amenity and enhancing biodiversity.</p> <p>There would be limited opportunity to increase open space provision in the town centre area, however the Albion Street surface car park has been identified as a suitable site for a new open space, provided parking spaces can be appropriately relocated elsewhere in the town centre.</p> <p>LTC OS4 – NATURE CONSERVATION Development on or within the Sites of Nature Conservation Importance will not be permitted if it is likely to destroy, damage or adversely affect the protected environment</p>	<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy <p>Omitted</p> <p>Omitted</p>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p> <p>Repetition of CS7 and CS12.</p> <p>Repetition of national policy</p>
Transport				

Options	Preferred Option	Draft Policy	Preferred Option/Policy <ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	Notes LP = Draft London Plan CS = Emerging Core Strategy
ISSUE LTC14: Should parking standards for new development be reviewed?				
LTC14A Retain existing standards for new development including retail development.	The preferred option for LTC14 is option B; to adopt London Plan standards for new development, including new retail development.	LTC TRS1 – LEWISHAM TOWN CENTRE PARKING STANDARDS The Council will seek to enhance the attractiveness of Lewisham Town Centre and reduce congestion in the area. New development should not exceed the maximum parking standards as set out in Table 3.2 and should seek to minimise parking where possible, taking account of: (a) the level of public transport accessibility in the town centre; (b) the aspiration to enhance sustainability in the town centre; and (c) pedestrian and cycle access. Council will encourage multi-use parking including public use of private commercial car parking spaces. New development should seek to make provision for high standards of accessibility, storage and changing facilities for cyclists and pedestrians, including those with disabilities, in the town centre. The Council will require development to make provision for cycle parking in accordance with the standards set out in Table 3.2.	Omitted	London Plan and LDF standards / policies apply
LTC14B Adopt London Plan standards for new development including retail development.				
LTC14C Apply a more stringent approach than the standards set out in the London Plan.				
ISSUE LTC15: In the context of potential significant growth in retail floorspace in Lewisham town centre, what approach should be taken to the provision of public/shopper parking spaces in the town centre?				
LTC15A Rationalise existing provision to encourage the use of public transport.	Notwithstanding the response received from the GLA, the preferred option is that the existing levels of public	LTC TRS2 – EXISTING PUBLIC / SHOPPER PARKING SPACES IN THE TOWN CENTRE The Council will seek to retain the quantum of existing public /shopper parking spaces in the town centre as a minimum level. The Council will, where possible , also	Retained with amendment	Need a proactive and coordinated strategy in the context of the expansion of retail floorspace

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>LTC15B Seek to retain existing levels of public parking.</p> <p>LTC15C Seek to increase provision of public parking.</p>	<p>parking in Lewisham town centre should be retained in line with option LTC15B. The option does have a degree of flexibility, and the draft policy interprets the retention of parking levels with respect to maintaining the proportion of parking in relation to the expansion of retail floorspace, which is in conformity with PPS6.</p>	<p>seek to broadly maintain the existing ratio of parking spaces to retail floorspace through a moderate increase in provision in line with an expansion in retail floorspace. The development of the following opportunity areas and sites will involve a significant amount of new retail floorspace and all existing and any new associated parking spaces should be publicly accessible.</p> <p>(a) Hartwell Ford site (b) Engate Street site (b) Conington Road Opportunity Area (c) Loampit Vale Opportunity Area (d) Ladywell leisure Centre</p>	<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	<p>LP = Draft London Plan CS = Emerging Core Strategy</p>
<p>OTHER POLICIES</p>	<p>LTC TRS3 – CYCLING AND WALKING ROUTES Opportunities to enhance routes such as Waterlink Way, and to connect other parts of the town centre into the cycling and pedestrian network should be maximised.</p> <p>LTC TRS4 – MITIGATING AGAINST THE IMPACT OF ROADS AND ROUNDABOUTS The Council will support measures to improve the visual and pedestrian experience of the town centre, including at the following locations:</p> <p>(a) Northern roundabout; (b) Loampit Vale; (c) Lee High Road and Belmont Hill; (d) Lewisham High Street; (e) Molesworth Street; and (f) Southern roundabout and; (g) the junctions at Ladywell Road/Lewisham High Street/Courthill Road</p>	<p>No change</p> <p>Retained with amendment</p>	<p>No change</p> <p>Retained with amendment</p>	<p>Town centre specific statements required</p> <p>Town centre specific statements required</p> <p>Repeats London Plan</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy <ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	Notes LP = Draft London Plan CS = Emerging Core Strategy
	<p>LTC TRS5 – TRAVEL PLANS</p> <p>Developments that will have a significant transport impact (reaching or exceeding the thresholds set out in Table 3.3) will be required to submit a travel plan in order to reduce the impact of travel and transport on the environment. The Council will support car sharing and car club schemes and provision for alternative modes of transport to and any other schemes which challenge the use of private vehicles throughout the life of the proposed development. All other development proposals below the thresholds identified in Table 3 should be accompanied by a suitable commitment to encourage sustainable travel and the provision of sustainable travel information such as installing cycle parking, making public transport information available and promoting travel choices to staff members.</p>		Omitted	policy 6.3
Environment				
ISSUE LTC16: How can the AAP seek to protect and enhance the environs of the Rivers Quaggy and Ravensbourne?				
<p>LTC16A</p> <p>New development should contribute either with physical environmental improvements or financial contributions to fund improvements in order to protect and enhance the river environment in the town centre.</p>	<p>The preferred option for issue LTC16 is option A. New development should contribute either with physical environmental improvements or financial contributions to fund improvements in order to protect and enhance the river environment in the town centre.</p>	<p>LTC ENV1 – PROTECT AND ENHANCE THE ENVIRONS OF THE RIVERS</p> <p>The Council will seek to protect and enhance the environs of the River Quaggy and the River 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, in terms of public amenity and environmental quality, the provision of natural habitats, enhancement of biodiversity and the provision of effective flood defences. Where appropriate, the Council will support the de-culverting of rivers and programmes of naturalisation of riparian environments.</p>	Omitted	Repetition of CSP11 – incorporated within redrafted LTC URB7
<p>LTC16B</p> <p>On the basis that there is no demonstrable harm to the river and its environment, contributions should not</p>				

Options	Preferred Option	Draft Policy	Preferred Option/Policy <ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	Notes LP = Draft London Plan CS = Emerging Core Strategy
<p>The Council will facilitate the monitoring of the AAP through the following interventions:</p> <p>(a) Adherence to PPS64 recommendations for town centre healthcheck monitoring; (b) Liaison with the Town Centre Manager; and (b) Monitoring progress on planning applications. (c) Reporting progress on infrastructure delivery to the Asset Management Board and Sustainable Development Partnership; and. (d) The inclusion of a town centre specific section in the Annual Monitoring Report (AMR)</p> <p>The full monitoring framework including indicators, targets, trends and indicator sources, can be viewed in Appendix 4.</p> <p>LTC IMP 2 – COMPULSORY PURCHASE ORDER POWERS Where necessary, the Council will use Compulsory Purchase Order (CPO) powers to deliver agreed strategies in line with policies and site allocations of the Lewisham Town Centre Area Action Plan.</p> <p>LTC IMP3 – LEWISHAM TOWN CENTRE S106 POOLING AND PRIORITIES The Council will seek to facilitate the pooling of developer contributions to achieve a comprehensive and holistic approach to the regeneration of the town centre. In discussion with developers, the Council will expect contributions from new development to assist in achieving the following interventions:</p> <p>(a) public realm enhancements; (b) contributions to achieve comprehensive improvements in Opportunity Areas; (c) shopfront improvement grants; (d) appropriate town centre management initiatives; (e) community development projects including engagement exercises; (f) improvements to the Rivers and their environs, including naturalisation and ecological quality; (g) implementation of Waterlink Way; (h) funding of town centre community, health and leisure facilities and infrastructure needs resulting from major development; (i) employment and training support; (j) air quality management measures;</p>			<p>Omitted</p> <p>Omitted</p>	<p>priority for the AAP</p> <p>Specific implementation options considered and reviewed as part of a new issue (issue 19)</p> <p>Specific implementation options considered</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy	Notes
<p>(k) traffic management measures, including pedestrian routes and facilities; and/or (l) public transport improvements.</p> <p>LTC IMP4 - PARTNERSHIP AND CONSULTATION In implementing the policies and proposals put forward in this Area Action Plan, the Council will comply with the Statement of Community Involvement by encouraging consultation and stakeholder involvement on all key development sites.</p> <p>LTC IMP5 – INFRASTRUCTURE AND SERVICES Development in Lewisham Town Centre will be required to contribute to the upgrading of utilities as necessary to support the development. Local improvements may be required to gas, electricity, water, telecommunications supplies and foul and surface water sewerage.</p> <p>LTC IMP6 - TRANSPORT CAPACITY Where development proposals will have a significant impact on highway or public transport networks, contributions may be sought in relation to:</p> <p>(a) increased line or station capacity on DLR and rail lines; (b) improved operating environment and facilities for buses; (c) enhanced pedestrian and cycle connections, particularly between development areas and the public transport interchange.</p> <p>LTC IMP7 – EDUCATION AND TRAINING SCHEMES Major development should contribute to education and training by incorporating schemes as part of their construction and ongoing operations. This may involve one or more of the following:</p> <p>(a) Employment opportunities and training schemes for local people in construction related industries associated with development; (b) Employment of local people in the ongoing enterprise; and/or (c) The development of training programme (from small scale work experience type activities through to formal educational programmes) associated with on-going enterprise.</p>			<ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy <p>Omitted</p> <p>Omitted</p> <p>Omitted</p> <p>Omitted</p>	<p>LP = Draft London Plan CS = Emerging Core Strategy</p> <p>and reviewed as part of a new issue (issue 19)</p>

Options	Preferred Option	Draft Policy	Preferred Option/Policy <ul style="list-style-type: none"> No change Omitted Retained with amendment New policy 	Notes <p>LP = Draft London Plan CS = Emerging Core Strategy</p>
New options, preferred options and policies (see main report for detailed overview)				
<p>Issue 17: What opportunities are there for CO2 emission reduction in Lewisham Town Centre/ What role if any, should DE play in minimising CO2 emissions in Lewisham Town Centre? Is DE realistic and if so what options are there for delivering it?</p> <p>Options: 17A: Solar thermal (ST); 17B: Photovoltaics (PV); 17C: Wind turbines;; 17D: Gas-fired CHP; 17E: Biomass or bio-fuel fired CHP; 17F: Air source heat pumps (ASHP); 17G: Ground source heat pumps (GSHP); and 17H: Decentralised energy Preferred option: Composite – 17A, 17B, 17D and 17H</p> <p>New Policy 1: Carbon Dioxide Emission Reduction in Lewisham Town Centre</p>			New policy	Town centre specific policy required to consider impact of evolving national framework alongside regional and local priorities
<p>Issue 18: What social infrastructure is required to support the projected growth in the town centre during the plan period?</p> <p>Options: 18A: Increase primary school capacity 18B: Increase secondary school capacity 18C: Specific childcare approach 18D: Increase primary health care provision</p> <p>Preferred option: Composite of all options</p> <p>New Policy 2: Social infrastructure</p>			New policy	Town centre specific policy required through updated options process

Options	Preferred Option	Draft Policy	Preferred Option/Policy <ul style="list-style-type: none"> • No change • Omitted • Retained with amendment • New policy 	Notes <p>LP = Draft London Plan CS = Emerging Core Strategy</p>
<p>Issue 19: What approach should the AAP take to delivery and implementation?</p> <p>Options: 19A: Rely on Borough-wide approach 19B: Define bespoke town centre implementation strategy</p> <p>Preferred option: Hybrid of 19A and 19B</p> <p>New Policy 3: Implementation</p>			<p>New policy</p>	<p>Refreshed approach to implementation which consolidates the emerging approach for the town centre.</p>

Table 2: Site-specific policies

Preferred Option		Comments	Proposed changes
Policy Reference	Policy Title		
LTC OPP0	Opportunity Area Policies	Not required – dealt with by Core Strategy	Omitted
LEWISHAM GATEWAY			
LTC OPP1	Lewisham Gateway Opportunity Area	Not required – dealt with by Core Strategy	Omitted
LTC OPP1a	General principles for Lewisham Gateway	Not required – dealt with by Core Strategy	Omitted
SITE SPECIFIC POLICY 1.1	Kings Hall Mews	New site – sensitive location adjacent to Gateway scheme	New policy
LEWISHAM CENTRE			
LTC OPP2	Lewisham Centre and adjoining land	Different geographical coverage and scope of proposals	Retained with amendment as Character area policy6
LTC OPP2a	Entrance and routes	Shopping centre unlikely to come forward for redevelopment	Omitted
LTC OPP2b	Urban form	Shopping centre unlikely to come forward for redevelopment	Omitted
LTC OPPc	Public realm	Scale of changes unlikely to take place	Omitted
LTC OPPd	Vehicular servicing and parking	Shopping centre unlikely to come forward for redevelopment	Omitted
LTC OPP2e	Molesworth Street frontage	Considered unlikely to be implemented	Omitted
LTC OPP2f	Land south of the shopping centre	Still relevant	Retain but with amendments as Site-Specific Policy 6.2
LTC OPP2g	Land north of the shopping centre	Still relevant	Retain but with amendments as Site-Specific Policy 6.1
LTC OPP2h	Molesworth Street surface car park site	Site retained as car parking	Omitted
LTC OPP2i	Citibank Tower	Aspirations still apply	No change (now, Site Specific Policy 6.4)
LTC OPP2j	Lewisham High Street and market	Not required. Points are covered in other policies	Omitted
LEE HIGH ROAD			
LTC OPP3	Lee High Road	Largely still appropriate	Retained with amendment as Character area policy 4
LTC OPP 3a	Lee High Road western end	Largely still appropriate notwithstanding	Retain but with amendments as Site-Specific Policy 4.1

Preferred Option		Comments	Proposed changes
Policy Reference	Policy Title		
		planning permissions granted recently	
LTC OPP3b	Lee High Road eastern end	Scheme built	Omitted
LTC OPP3c	Clarendon Green	Retention of Clarendon Rise car park	Omitted
LOAMPIT VALE			
LTC OPP4	Loampit Vale	Given progress on many sites this policy is now in need of review	Retained with amendment as Character area policy 2
LTC OPP4a	Loampit Vale South – a mixed use urban street	On site	Omitted
LTC OPP4b	East side of Elmira Street	On site	Omitted
LTC OPP4c	West of Elmira Street	On site	Omitted
LTC OPP4d	Thurston Road opportunity	Replaced by sub-area wide policy	Omitted
LTC OPP4e	Land west of Jerrard Street	Review and note that consent already granted	Retain but with amendments as Site-Specific Policy 2.2
LTC OPP4f	Land east of Jerrard Street	Review	Retain but with amendments as Site-Specific Policy 2.1
LTC OPP4g	Railway strip	Retain policy	Retain but with amendments as Site-Specific Policy 2.3
CONNINGTON ROAD			
LTC OPP5	Connington Road		Retained with amendment as Character area policy 3
LTC OPP5a	Northern Link		Omitted
LTC OPP5b	Tesco block	Still largely relevant although subject to change following discussions with Tesco and recent design work	Retain but with amendments as Site-Specific Policy 3.1
LTC OPP5c	Car park and petrol station		Omitted – incorporated in site specific policy 3.1
ENGATE STREET			
LTC OPP6	Engate Street	No longer considered appropriate	Omitted
LTC OPP6a	Engate Street mixed use block	No longer considered appropriate	Omitted
LADYWELL ROAD			
Character area policy 5	Ladywell Road character area	New character area to respond to evolving site context	New policy
Site Specific Policy 5.1	Ladywell Leisure Centre Site	New site subject to options testing and development	New policy

Appendix 4

Monitoring framework

The following table sets out each of the 37 draft policies outlined in the AAP Further Options Report and details the objectives that each will help deliver. In the draft AAP (due for public consultation in spring 2012) indicators and associated targets will have been identified for every proposed policy to form a monitoring framework for the draft plan.

What AAP objectives does it deliver?	What indicators will we use for monitoring?	What is the target?	Indicator source
LTC HSG3 – CONVERSION OF EXISTING BUILDINGS			
Objective 2 - Housing Objective 4 - Employment and training	Net gain of housing units (and loss of commercial floor space) from completed conversions	No net loss of housing	Core Strategy / AAP monitoring AMR
LTC SH2 – VITALITY AND VIABILITY			
Objective 1 - Retail and town centre status	Implementation of Lewisham Gateway proposals	Started by 2016	Core Strategy / AAP monitoring
Objective 2 - Housing Objective 4 - Employment and training	Delivery of public realm enhancements	Delivery in accordance with the IDP and AAP delivery timetable	Core Strategy / AAP monitoring
Objective 5 - Open space/recreation	Amount of retail floor space delivered	40,000sqm by 2021	AMR
Objective 8 - Community	Amount of residential units delivered	2,300 by 2016 A further 800 by 2021	AMR
	Delivery of community and leisure facilities	No net loss	Core Strategy / AAP monitoring
	Amount of employment / office space provided	No net loss	AMR
LTC SH3 – LEWISHAM MARKET			
Objective 1 - Retail and town centre status			
LTC SH5 – PRIMARY SHOPPING AREAS			
Objective 1 - Retail and town centre status			

What AAP objectives does it deliver?	What indicators will we use for monitoring?	What is the target?	Indicator source
LTC SH6 – SECONDARY SHOPPING AREAS			
Objective 1 - Retail and town centre status			
LTC SH7 – RETAIL CHARACTER AREAS			
Objective 1 - Retail and town centre status			
LTC SH8 – CRITERIA FOR EVENING ECONOMY USES			
Objective 1 - Retail and town centre status Objective 8 - Community			
LTC SH9 - TOWN CENTRE BOUNDARY			
Objective 1 - Retail and town centre status Objective 2 - Housing			
LTC URB4 – MIXED USE			
Objective 1 - Retail and town centre status Objective 2 - Housing Objective 3 - Sustainable design Objective 4 - Employment and training			
LTC URB5 - URBAN ENCLOSURE, GRAIN			
Objective 2 - Housing Objective 3 - Sustainable design Objective 5 - Open space/recreation			
LTC URB6 - PUBLIC REALM			

What AAP objectives does it deliver?	What indicators will we use for monitoring?	What is the target?	Indicator source
Objective 5 - Open space/recreation			
LTC URB7 – ENHANCING LEWISHAM'S WATERWAYS			
Objective 7 - Environment			
LTC EMP1 – EMPLOYMENT USES IN LEWISHAM TOWN CENTRE			
Objective 4 - Employment and training			
LTC EMP2 – OFFICE USES IN LEWISHAM TOWN CENTRE			
Objective 4 - Employment and training			
LTC TRS2 – EXISTING PUBLIC / SHOPPER PARKING SPACES IN THE TOWN CENTRE			
Objective 1 – Retail and town centre status Objective 6 - Transport			
LTC TRS3 – CYCLING AND WALKING ROUTES			
Objective 6 - Transport			
LTC TRS4 – MITIGATING AGAINST THE IMPACT OF ROADS AND ROUNDABOUTS			
Objective 5 - Open space/recreation Objective 6 - Transport			
LTC COM3 – RANGE OF COMMUNITY, LEISURE AND ENTERTAINMENT SPACES			
Objective 5 - Open space/recreation Objective 8 - Community			
LTC IMP1 – MONITORING			
Objective 9 - Implementing and			

What AAP objectives does it deliver?	What indicators will we use for monitoring?	What is the target?	Indicator source
monitoring the AAP			
NEW POLICY 1 – CARBON DIOXIDE EMISSION REDUCTION IN LEWISHAM TOWN CENTRE			
Objective 3 – Sustainable design Objective 7 - Environment			
NEW POLICY 2 – SOCIAL INFRASTRUCTURE			
Objective 2 - Housing Objective 5 - Open space/recreation Objective 8 - Community			
NEW POLICY 3 – IMPLEMENTATION.			
Objective 9 - Implementing and monitoring the AAP			
SITE SPECIFIC POLICY 1.1: Kings Hall Mews			
All objectives			
CHARACTER AREA POLICY 2: Loampit Vale character area			
All objectives			
SITE SPECIFIC POLICY 2.1: Loampit Vale North – east of Jerrard Street			
All objectives			
SITE SPECIFIC POLICY 2.2: Loampit Vale North – west of Jerrard Street			
All objectives			
SITE SPECIFIC POLICY 2.3: Railway strip			
All objectives			
CHARACTER AREA POLICY 3: Conington Road character area			
All objectives			
SPECIFIC POLICY 3.1: Tesco block and car park land			

What AAP objectives does it deliver?	What indicators will we use for monitoring?	What is the target?	Indicator source
All objectives			
CHARACTER AREA POLICY 4: Lee High Road character area			
All objectives			
SITE SPECIFIC POLICY 4.1: Lee High Road western end			
All objectives			
CHARACTER AREA POLICY 5: Ladywell Road character area			
All objectives			
SITE SPECIFIC POLICY 5.1: Ladywell Leisure Centre site			
All objectives			
CHARACTER AREA POLICY 6: Central area character area			
All objectives			
SITE SPECIFIC POLICY 6.1: Land north east of the shopping centre			
All objectives			
SITE SPECIFIC POLICY 6.2: Land south of the shopping centre			
All objectives			
SITE SPECIFIC POLICY 6.3: Citibank Tower			
All objectives			

Appendix 5

Schedule of changes to the Proposals Map

The inclusion of the recommended options from this Further Options report in a draft AAP and subsequent adoption of such policies would require a number of amendments to be made to the existing UDP Proposals Map, July 2004. These potential changes are detailed in the table below.

For the draft AAP, a set of inset maps will be produced to accompany the draft schedule and illustrate the required changes.

Schedule of required changes to the proposals map:

Proposals map elements	Required change
Major / District Centre	Reduction in boundary size as detailed in recommended policy option LTC SH9
Local Landmarks	<p>2 additional local landmarks as identified in the Local Development Framework evidence base – tall buildings study.</p> <ul style="list-style-type: none"> • St Johns United Reformed Church • St Saviours RC Church <p>Detail of the new designations can be found in recommended policy options XXX XXX and XXX XXX</p>
Development Sites	<p>Wholesale changes are required to the designation of development sites within the town centre boundary.</p> <p>The following sites were included in the UDP proposals map 2004 and are no longer required:</p> <ul style="list-style-type: none"> • UDP Site 24 – Development complete • UDP Site 34 – Development complete • UDP Site 35 – Development commenced • UDP Site 36 – Development complete • UDP Site 37 – Remove and replace with Lewisham Gateway scheme identified in the Core Strategy as Strategic Site Allocation 6 • UDP Site 38 – Development complete • UDP Site 39 – Remove and replace with Lewisham Gateway scheme identified in the Core Strategy as Strategic Site Allocation 6 • UDP Site 42 – Development complete <p>The following sites were included in the UDP proposals map 2004 and require boundary amendments:</p> <ul style="list-style-type: none"> • UDP Site 40 – Site partially developed, reduce boundary to limit of surface car park as detailed in the site specific policy for Molesworth Street car park. • UDP Site 40A – Amend site boundary to conform with site specific policy for Land South of the Shopping Centre.

	<p>The following sites were not included on the UDP proposals map 2004 and will require addition as a result of inclusion in the AAP:</p>
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- ***List of all finalised sites when complete and agreed***



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