

**Draft Surrey Canal Triangle
Design Framework
Draft Supplementary Planning Document
(agenda supplement)**

**Strategic Environmental Assessment (SEA)
Screening Report**

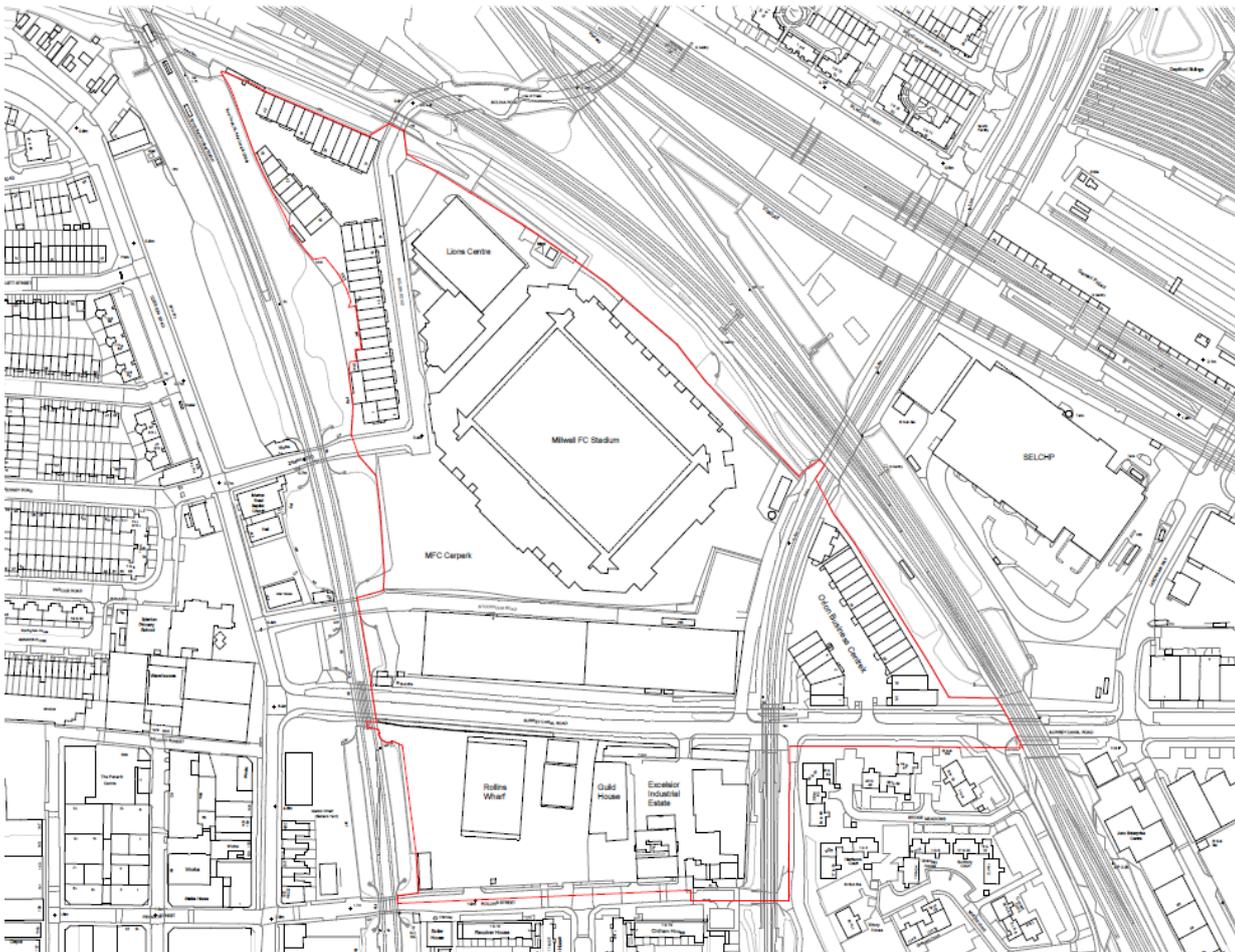
Strategic Environmental Assessment Screening
for the Surrey Canal Triangle Supplementary
Planning Document
September 2019



Section1: The Strategic Environmental Assessment Screening Process

Introduction

1.1 The London Borough of Lewisham is preparing a Supplementary Planning Document (SPD) to provide further guidance on the comprehensive masterplan for Surrey Canal Triangle, as allocated for redevelopment in the LB Lewisham Core Strategy 2011, to make the best use of available land close to transport hubs, increase the delivery of affordable new homes and to facilitate the future aspirations of Millwall Football Club at the heart of the site.



1.2 This Strategic Environmental Assessment (SEA) screening is being prepared in accordance with the requirements of Directive 2001/42/EC of the European Parliament and of the Council on the Assessment of the Effects of Certain Plans and Programmes on the Environment and the Environmental Assessment of Plans and Programmes Regulations 2004. The following guidance has also been taken into account:

- The National Planning Policy Framework (NPPF) (DCLG, 2012, as updated 2019).
- The National Planning Practice Guidance (PPG ID: 11) in relation to SEA/SA (DCLG, 2015).
- A Practical Guide to the Strategic Environmental Assessment Directive (ODPM, 2005).

1.3 The screening consultation is being prepared to enable the specified statutory consultation bodies (Natural England, Historic England and the Environment Agency) to comment on the appropriateness of the screening process for this proposed SPD. Other bodies that have specifically been invited to comment are:

- Neighbouring London Boroughs;
- Transport for London;
- Greater London Authority

1.4 Comments are invited to be made in writing and returned to the Planning Policy Team at:

- **Post** : SEA Screening Consultation (Surrey Canal Triangle SPD), Planning Policy London Borough of Lewisham, 5th Floor Laurence House, 1 Catford Road, Catford, LONDON SE6 4RU
- **Email** : planning.policy@lewisham.gov.uk
- The consultation period will run from Monday 16th September to Monday 21st October 2019

SEA Screening process and the Scope of the Surrey Canal Triangle SPD

1.5 This Screening Report has been prepared in accordance with Section 9(3) of the SEA Regulations 2004 and is based on the Council's current scope of the Surrey Canal Triangle SPD.

1.6 The purpose of the SPD will be to:

- Build on the policies within the Local Plan; and
- Provide further guidance on key considerations for the comprehensive development of the Surrey Canal Triangle area.

1.7 The purpose of the SPD will be to provide further guidance on the Strategic Site Allocation within the Core Strategy and the application of other key relevant policies within the LDF. It will not create any new policy or amend existing adopted policies. A proposed structure of the Surrey Canal Triangle SPD is set out below. Once produced, the draft of the Surrey Canal Triangle SPD will be subject to formal public consultation.

Proposed Surrey Canal Triangle SPD Structure

1 Introduction including:

- The Role of the SPD
- Background
- The Vision

- Site History

2 The Surrey Canal Triangle Development Area Today including:

- Existing Site and Uses
- Existing Access and Movement Network
- Existing Open Space Network
- Existing Community Provision
- Wider and Strategic Context

3 Development Principles

4 The Urban Design Framework including:

- Overarching Principles Local Distinctiveness and Character Areas
- Public Realm
- Land Uses
- Heights, Scale and Massing

5 Delivery and Requirements

6 Statutory Considerations

7 Consultation

SA/SEA of the Lewisham Core Strategy and Site Local Plan

- 1.8 The adopted Lewisham Core Strategy has been the subject of Sustainability Appraisal (including Strategic Environmental Assessment) and this has included the Surrey Canal Triangle Site Allocation (SSA3) and all other policies. This SA/SEA process was undertaken throughout the plan preparation process. The relevant Sustainability Appraisal documents and the LDF Core Strategy can be found on the London Borough of Lewisham website. The Sustainability Appraisal for the Core Strategy was undertaken in September 2010. A separate Habitats Regulations Assessment Screening was also undertaken in February 2010.
- 1.9 Paragraph 165 of the NPPF (2012 and last updated 2019) states “A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors”.
- 1.10 Paragraph 166 states that “Assessments should be proportionate, and should not repeat policy assessment that has already been undertaken”.
- 1.11 National Planning Practice Guidance (NPPG) (2016 and last updated 2019) states that:

“Supplementary planning documents do not require a sustainability appraisal but may in exceptional circumstances require a strategic environmental assessment if they are likely to have significant environmental effects that have not already have been assessed during the preparation of the Local Plan.

A strategic environmental assessment is unlikely to be required where a supplementary planning document deals only with a small area at a local level (see regulation 5(6) of the Environmental Assessment of Plans and Programmes Regulations 2004), unless it is considered that there are likely to be significant environmental effects.

Before deciding whether significant environment effects are likely, the local planning authority should take into account the criteria specified in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004 and consult the consultation bodies.”

Screening Assessment

1.12 The SEA screening procedure generally comprises of 6 stages, as detailed below:

1. Preliminary Assessment: to determine whether screening is necessary;
2. Assessment of likely Environmental Effects: if screening is required the an assessment of the likely environmental effects, including any significant effects, will be undertaken in accordance with the SEA Regulations 2004;
3. Draft Screening Report: a draft screening report will be prepared summarising the results of Stage 2 and including a draft determination as to whether the SPD is likely to have significant environmental effects;
4. Consultation with statutory bodies: the Environment Agency, Historic England and Natural England will be consulted on the draft Screening Report. In this case, the council will consult additional stakeholders considered to have a strategic interest in this stage of the SPD preparation.
5. Final Screening Report: consideration to be given to the responses from the three statutory bodies and other consultees and then a final version of the screening report prepared confirming:
 - a. The result of the screening;
 - b. Responses from the consultation bodies and other consultees;
 - c. The final determination, and
 - d. The statement of reasons if no SEA is required
6. Final Screening Report made publically available: the Council will issue the Final Screening Report to each of the three statutory consultees and other consultees and make it publicly available for inspection.

1.13 This is the stage 3 report, with the current consultation being stage 4.

1.14 The document “A Practical Guide to the Strategic Environmental Assessment Directive” (ODPM, 2005), sets out eight criteria that should be taken into account when screening a plan or programme to determine whether it will require SEA. The following provides the London Borough of Lewisham’s screening assessment using these criteria and the recommended methodology within the guide.

Table 1: Application of the SEA Directive to the Proposed SPD

	Screening Question	Screening assessment
1.	Is the SPD subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority through legislative procedure by Parliament or Government ?	Yes. The SPD will be prepared and adopted by the London Borough of Lewisham in its role as Local Planning Authority.
2.	Is the SPD required by legislative, regulatory or administrative provisions?	No. Preparation of SPD is not a requirement of legislation, regulatory or administrative provisions.
3.	Is the SPD prepared for agricultural, forestry, fisheries, energy, industry, transport or waste management, telecommunications, tourism, town and country planning or land-use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive?	Yes. The SPD is intended to provide further guidance to the LDF Core Strategy which is the town planning policy framework for its area, including policy for land-use. The Core Strategy has been subject to full Sustainability Appraisal (including SEA). The SPD will not create new policy or land-use designations.
4.	Will the SPD, in view of its likely effects on sites, require an assessment under Article 6 or 7 of the Habitats Directive?	No. The Core Strategy were subject to screening for the need for assessment under the requirements of the Habitats Directive and it was concluded that such assessment was unnecessary. As the SPD will not change or add to policy, proposals or designations within the Core Strategy it is not considered that further screening for such assessment is necessary as there would be no likely effects on European Sites.
5.	Does the SPD determine the use of small areas at local level, OR is it a minor modification of a plan subject to Article 3.2?	No. The policies, proposals and allocations that determine use within the SPD area have already been set within the Core Strategy. There will be no aspect of the SPD which would modify these policy documents.

6.	Does the SPD set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)?	No. This framework is already set within the Core Strategy. The SPD will provide further guidance on the relevant policies, proposals and allocations within this document.
7.	Is the SPD's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget plan, OR is it co-financed by structural funds or EAGGF programmes 2000-2006/7?	No
8.	Is it likely to have a significant effect on the environment?	It is not likely that the SPD will have any significant effect on the Surrey Canal Triangle area or elsewhere that has not already been assessed through Sustainability Appraisal (including SEA) of the Core Strategy. For example, the assessment of the Site Allocation SSA3 Surrey Canal Triangle concluded that whilst there may be some negative impacts in the shorter term, there were predominantly positive impacts in the longer term, including to business and economics, environmental quality, biodiversity, community identity, training and education. It concluded that there may be more uncertain noise and air quality impacts but that any negative impacts could be improved through mitigation.

Table 2 : Determining the likely significance of effects

	SEA Directive Annex II: Criteria for determining likely significance of effects referred to in Article 3(5)	Comment
1.	The characteristics of plans and programmes, having regard, in particular, to:	
1a)	The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	The SPD will provide further guidance to the policies, proposals and the allocations that are contained within the Core Strategy and already set the framework for the development projects and activities that could occur within the Surrey Canal Triangle SPD area. The Core Strategy, including those parts that set a framework for Surrey Canal Triangle, have been fully assessed for the purposes of SA/SEA
1b)	The degree to which the plan or programme influences other plans and programmes including those in a hierarchy	The Surrey Canal Triangle SPD, in providing further guidance to the framework set within the Core Strategy does not directly affect other specific public sector plans or programmes but rather is influenced by the Core Strategy and other higher tier planning policy, including the London Plan and NPPF
1c)	The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	The Core Strategy and other higher level policies set the context for achieving sustainable development for which the SPD will provide further guidance as to how this should be achieved. These options will not revisit or change the higher level policy requirements and in the case of the Core Strategy, this have been subject of SA/SEA. The SA Report 2010 concluded that the Surrey Canal Triangle site allocation will give rise to a positive impact overall and a specifically positive impact for the majority of the SA objectives when assessed against these.

1d)	Environmental problems relevant to the plan or programme	The assessment of the Site Allocation SSA3 Surrey Canal Triangle concluded that whilst there may be some negative impacts in the shorter term, there were predominantly positive impacts predicted in the longer term, including to business and economics, environmental quality, biodiversity, community identity, training and education. It concluded that there may be more uncertain noise and air quality impacts but that any negative impacts could be improved through mitigation.
1e)	The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).	It is unlikely that there would be any significant impact resulting from the further guidance for this site allocation area.
2	Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:	
2a)	The probability, duration, frequency and reversibility of the effects	The SPD will provide guidance for and help give effect to the policies in the Core Strategy, which cover the 15 year plan period up to 2026. A Sustainability Appraisal was undertaken for the Core Strategy which included the Surrey Canal Triangle site allocation which is the area that will be addressed by the SPD. The evidence to support the SA for the Core Strategy continues to be up-to-date and looked at the probability, duration, frequency and reversibility of effects. The assessment of the Site Allocation SSA3 Surrey Canal Triangle concluded that whilst there may be some negative impacts in the shorter term, there were predominantly positive impacts in the longer term, including to business and economics, environmental quality, biodiversity, community identity, training and education. It concluded that there may be more uncertain noise and air quality impacts but that any

		negative impacts could be improved through mitigation. It is recognised that the SPD will provide further guidance on the design and the forms of development in the area which will result in higher level of certainty in the probability, duration, frequency and reversibility of any potential positive effects for SA objectives relating to noise and air quality.
2b)	The cumulative nature of the effects	Cumulative effects of the Surrey Canal Triangle site allocation have been assessed within the SA for the Core Strategy. There are no likely cumulative effects that would result from the production of the Surrey Canal Triangle SPD.
2c)	The trans-boundary nature of the effects	There will be no national trans boundary effects resulting from the Surrey Canal Triangle SPD given the highly localised nature of the area included and the types of development defined within the Core Strategy. Local administrative trans boundary effects were considered as part of the SA/SEA of these documents.
2d)	The risks to human health or the environment (e.g. due to accidents)	Human health effects were assessed in the SA for the Core Strategy for site allocation SSA3. No residual risks to human health or the environment were identified in relation to the site allocation area for Surrey Canal Triangle.
2e)	The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The spatial extent of the SPD will not be larger than the area already covered in the Core Strategy . This is a small area at local level with the site allocation area being 10 hectares. It has a range of existing businesses but a very limited existing residential population. The potential impact of the site allocation has been assessed as part of the SA/SEA of the Core Strategy. The impact on existing businesses is mitigated by the assessed employment policies within the Core Strategy. The magnitude of the impacts of the site allocation are therefore considered to be limited in this sense and positive in terms of the provision of a range of new homes and business space within the site allocation area

2f)	<p>The value and vulnerability of the area likely to be affected due to:</p> <p>I. special natural characteristics or cultural heritage,</p> <p>II. II. exceeded environmental quality standards or limit values III. intensive land-use</p>	<p>The value and vulnerability of the area of the Surrey Canal Triangle SPD have been considered as part of the SA/SEA of the Core Strategy, including the special natural characteristics and cultural heritage aspects, with the latter being of limited relevance. The intensiveness of the proposed use of the land was part of the SA/SEA assessment and no significant impacts were identified in relation to this.</p>
2g)	<p>The effects on areas or landscapes which have a recognised national, Community or international protection status</p>	<p>There are no landscapes or areas of recognised national, community or international protection status that have been identified in relation to the Surrey Canal Triangle site allocation/SPD area. However, further site specific guidance on appropriate design is considered largely positive with regard to local character and townscape.</p>

Draft determination

- 1.15 A screening assessment has been undertaken on the Surrey Canal Triangle SPD, as detailed in Tables 1 and 2.
- 1.16 The assessment indicates that the spatial extent of the SPD is limited to a strategic site in a contained area of the Borough, and the scope of the document is to provide guidance which will help give effect to the adopted Core Strategy policies.
- 1.17 Any effects resulting from higher tier planning documents including the ‘parent policies’ relevant to this SPD have already been considered and assessed by a separate full SEA through the Development Plan process.
- 1.18 The SPD does not propose any new policies, or the amendment of existing adopted policies, and will not allocate resources or direct other higher level plans and programmes.
- 1.19 In conclusion, the draft determination is that a SEA will not be required.

Next Stage

- 1.20 The draft determination is that a SEA will not be required for the SPD. However, before a final determination is made it will be necessary to:
- 1 Consult on this draft determination with the three statutory consultees and other consultees listed in Paragraph 1.3, and
 - 2 Prepare a final screening report, which is to be made publicly available.

**Draft Surrey Canal Triangle
Design Framework
Supplementary Planning Document
Pre-production consultation responses**

Surrey Canal Triangle SPD

Updated Responses from stage 1 pre-production for Cabinet reporting

21ST October 2019

Body/ Organisation	Summary of comments
Natural England	<p>Unlikely to have major effects on the natural environment but may have some effects. Therefore they do not wish to provide specific comments but ask for the following to be considered;</p> <ul style="list-style-type: none"> • Green Infrastructure. • Enhancing networks of Habitats. • Using GI to mitigate toward flooding and heat waves. • Health and quality of life benefits. • Refer to the 'good practice guidance for green infrastructure and biodiversity (Including in the Town & Country planning associations guide for sustainable communities. • Opportunities for Biodiversity enhancement. • Opportunities Landscape enhancement. • Impacts of Lighting and landscaping on biodiversity.
TFL	<ul style="list-style-type: none"> • TFL have adopted the Healthy Streets approach and recommends document includes reference to this. • Vision zero – designing towards zero deaths on roads in London by 2041 • Transport mitigation and improvement measures secured in previous planning applications should be carried forward. • Supportive of vision as set out in document. • References to building on opportunities created by existing and new stations are welcomed. • References to achieving sustainable development are welcomed. • Emphasis on sustainable and active modes of transport is recommended in the access and movement section of the baseline info. • References to consider the wider and strategic context are welcomed.
SELCHP	<p>No comments at this stage but confirm they would like to remain a consultee for this SPD and once a draft is available.</p>
London Borough of Southwark	<p>No comments at this stage but confirm they would like to remain a consultee for this SPD and once a draft is available.</p>
Thames Water	<ul style="list-style-type: none"> • SPD should include a policy relating to water supply and waste infrastructure, ensuring also that piecemeal upgrades are not delivered for each phase. • Reference should be made to Para. 20 of the NPPF - sufficient infrastructure provision. • Recommends developers engage early on as per para. 26 of the NPPF to ensure demand and infrastructural requirements met. • Comments in relation to flood risk and SUDS so as to ensure adequate provision and mitigation designed into the development.
No organisation given - summary of comments on website questionnaire	<ul style="list-style-type: none"> • Keep new station name Surrey Canal Road - citing heritage as reason • Make it pedestrianised except for emergency vehicles, no roads - pedestrian only and no parking except disabled • Area in need of much improvement, keen to see development and improvements delivered.

**Draft Surrey Canal Triangle
Design Framework
Supplementary Planning Document
Stage 2 SCT consultation programme**

Surrey Canal Triangle

Draft Supplementary Planning Document: Public Consultation: Programme

Production	Stage 2 consultation period - 13 November 2019 to 5 January 2020	(6 weeks)
Web publication Consultations page	1	The draft SPD along with all relevant and previously uploaded documentation was advertised on the Council's consultation page. A short online questionnaire was included. In line with new requirements, an accessible version of the draft SPD was also uploaded. A link providing contact details to the Urban Design inbox was also provided.
Newspaper advert	2	Consultation advertised in the 'New Shopper' local paper
Web publication SPD page	3	The draft SPD along with all relevant and previously uploaded documentation was advertised on the Council's SPD page along with a link to the consultation page (where the brief online questionnaire was also provided).
Paper copies	4	Paper copies of all information and the questionnaire were provided in, The Planning Information Office, Lewisham Library Deptford Lounge and Library
Site notices	5	Five site notices advising of the consultation were installed at key positions around the site perimeter.
Notification letters	6 7 8	6 A notification letter in email form went out to all relevant Councillors 7 A notification letter in email form went to all Statutory Consultees 8 A notification letter in email form went out to all relevant community groups that the Council holds contact details for.
Letter drop	9	A printed letter was mailed to all parties within the site boundary.
Letter drop	10	A printed letter was mailed to all parties in proximity to the site boundary.
Web update Advertising drop-in	11	Both the Consultations and SPD page were updated to notify of a drop-in session at Scotney Hall, SE15 1EY, 10th Dec. from 5pm to 8pm, providing opportunity for interested parties to talk directly to officers.
Drop-in session	12	Drop in session Held at Scotney Hall from 5pm to 8pm SPD, presentation boards on display and officers present to answer questions and take comments.
Consultation on Draft Closed	13	Consultation closed and documentation moved to "closed consultations" area on the Council website. Results to be published by w/e Friday 17th January 2020

**Draft Surrey Canal Triangle
Design Framework
Supplementary Planning Document
Stage 2 SCT
Issues raised from the consultation exercise**

Organisation - Statutory	Comment	Response
GLA	1 Supportive of much needed growth around the Surrey Canal Triangle area and recognises the positive contribution it can make to delivering development across London for industry, jobs and genuinely affordable housing.	Noted
	2 The draft SPD provides a comprehensive contextual analysis which is welcome.	Noted
	3 The area's relationship with London's central activities zones and opportunity areas could be set out and explored more clearly and fully, it is important that it links and responds to these too.	Noted. Pg 16 to include text on Lewisham, Catford and New Cross opp. areas - taken from the London Plan pages 364 & 365 - annex item 20
	4 It should be recognised that that the Mayor's strategic approach to London's industrial land has changed since the 2012 granted planning permission for mixed use employment. The London Industrial land study of 2017 says there will be a positive net demand over the period 2016 to 2041 and based on this evidence, the new London Plan identifies Lewisham as a 'retain capacity' borough in table 6.2. Lewisham should therefore be seeking to intensify industrial floor space.	In response to points 4, 5 and 6; Noted. The SPD seeks to increase the overall employment floor space offer, as part of a mixed use scheme. The site was designated through the appropriate routes and also identified as a housing zone by the GLA. Mixed use was accepted through the GLA's SHLA and identified as a key site contributing towards Lewisham's housing targets.
	5 Lewisham is also identified as being in the Central Services Area and boroughs in this area are expected to recognise the importance of providing essential services to Central Activities Zones eg. 'last-mile', administrative, printing and food related.	
	6 The Mayor recognises that the area has been allocated for mixed-use development and has extant planning permission but strongly encourages Lewisham to follow and implement, 'retain capacity' status due to it's location in within the Central Services Area.	
	7 the Local plan also sets out a requirement for 50% affordable housing where there is net loss of industrial floor space and this will inform the threshold for fast-track route status.	Noted
	8 The Mayor welcomes that the draft SPD responds positively to strategic views set out in the LVMF. Sectional analysis or 3D modelling would give an indication as to the maximum heights. Guidance as set out in the London Plan policies should be followed.	The SPD sets out the key high level considerations. Lewisham does not consider it appropriate to be giving detailed guidance on height, this is for the planning process to assess when detailed designs are provided.
	9 There then follows a tabulated description of more specific comments on pages of the SPD Highlights are as follows;	

9a	Pg 7 - The role of the SPD within the hierarchy of planning policy should be set out more clearly. A vision for the area would be useful and should be included here.	Noted - Lewisham's planning hierarchy chart will be added in this section.
9b	Analysis of land ownership/ long leaseholds would be useful in providing evidence for delivery.	The SPD is a design document and as such describes a vision for the area, technical issues such as land ownership have been considered in broad terms when forming and describing the vision, but the finer detail forms part of the planning process considerations.
9c	Pg 16. Clarity of status of and aspirations of pedestrian and cycle routes along with access through railways would be useful as this informs potential quantum of development.	High Level Principles are set out to inform development potential, Detail would form of the planning application process.
9d	Pg 19. Cross Boundary development with Southwark should be considered, along with opportunities for linking space. Should include area specific planning documents. Local neighbourhood areas/ forums should be identified and discussed.	The document has been developed in consultation with Southwark. Section 4.3 of the SPD deals with surrounding context in relation to the development of over-arching principles.
9e	Clarity on building height limits would be useful and should be identified using Policy D8 of the new London Plan. Specific locations and associated heights should be identified using policy D8	Response as per point 8
9f	Pg 24. Strategic planning objectives should indicate quantum's i.e. Numbers of affordable homes, jobs and industry etc.	The SPD is a design based document and provides further guidance on Policy SSA3 which in turn sets out the agreed development criteria.
9g	Pg. 32 - key objectives are vague and neighbouring developments/ public realm beyond the boundary should be included for consideration in the SPD and to capitalise on opportunities.	Policy SSA3 sets out the objectives. Section 4.3 of the SPD deals with surrounding context in relation to opportunities and the over-arching principles for those.
9h	Clarity of heights across the site might be useful - heat map does not currently reflect what is consented in outline.	The consented outline envisaged clusters around a new station and South Bermondsey station with additional marker buildings along the Surrey Canal Road. We feel the heat map broadly aligns with this approach.
9i	The SPD should clearly identify the specific requirements for Stadium access. Clarity of requirements over space and priority eg. For broadcasting would also be useful.	The SPD is a design framework setting the general parameters for design in order to ensure a comprehensive approach to the development of the Surrey Canal Triangle. Specific requirements for access will be established via forthcoming planning applications. The space to include possible location for outside broadcasting for the football club are identified.
9j	Mitigation measures eg. SELCHP should be illustrated	To be addressed in the detail of planning applications coming forward.
9k	Character areas should include existing plans and photo's of the sites and opportunities/ 'retain capacity' status due to it's location in within the Central Services Area.	Noted - the level of historical detail provided within the SPD is considered appropriate.
9l	Development phasing should be considered.	Delivery and Phasing is dealt with in section 6.1 in sufficient and appropriate depth at the level of an SPD design document
TFL	1 TFL generally supportive but in order to ensure delivery of the good growth agenda, Lewisham may wish to add greater detail to the SPD to ensure a stronger influence on developments coming forward for the area.	Noted. Lewisham feels that the level of detail provided is appropriate for this SPD. The focus of an SPD is essentially strategic, not a detailed design or technical document.

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|--|---|
| <p>2 There are a number of references to the Lewisham Core Strategy 2011. Is it possible that these are now out of date /in the process of being updated to reflect current circumstances and/or need to reflect current aspirations of the Local Plan 2016. Confirmation and clarity would be useful. Similarly to the development policies and site allocations - now 5 years old.</p> | <p>All documentation referred to are in-date. Policy SSA3 in Lewisham's core strategy is the defining overall policy for this SPD. It is noted that the GLA are at the stage where they intend to publish a new London Plan. The SPD will be monitored and assessed against any new policy that might be considered relevant - and on an ongoing basis.</p> |
| <p>3 TFL would support the use of a healthy living streets diagram.</p> | <p>Noted - this will be included in the access and movement section.</p> |
| <p>4 Suggest guidance on Vision Zero in the SPD</p> | <p>Noted - this will be included.</p> |
| <p>5 The area has a low PTAL currently, improvements to bus services will be required and this will also support the healthy living streets agenda. The previously secured agreements for a new bus interchange for example will need to remain.</p> | <p>Noted, the detail will be considered as development comes forward through the planning process.</p> |
| <p>6 The SPD must also be dependant on improvements to train frequencies and a new station.</p> | <p>Noted, discussions are taking place and HIF funding for a new station has been secured</p> |
| <p>7 Any improvement works around the station and surrounding infrastructure are not part of the current HIF fund so the Council should discuss with TFL any additional works and secure funding for these additions.</p> | <p>Agreed. This will form part of detailed follow-up discussions as development comes forward and through the planning process</p> |
| <p>8 It is recommended that references to policies are updated for those in the new draft of the London Plan.</p> | <p>References to the Mayor's 'intent to publish' will be added where appropriate and in relation to Policy references in the SPD</p> |
| <p>9 It is important that development is configured to maximise accessibility to both new and existing stations and bus stops within the area of pedestrians and cyclists to include those also with disabilities - and within the SPD area and beyond including Southwark.</p> | <p>Noted. Principles of access, movement and connections are set out and the detail will be considered as development proposals come forward.</p> |
| <p>10 TFL is supportive of the vision. It would help to incorporate references to the importance of public transport within the area to support forthcoming development and the need to create strong and attractive walking and cycling routes.</p> | <p>References are within in section 2.2 Access and movement (the healthy living streets diagram will also be inserted), section 2.5 wider strategic context, constraints and opportunities pages 33 to 35, over-arching principles section 4.3, section 5.6 of character areas - Stockholm, Section 6.2 Infrastructure requirements.</p> |
| <p>11 An additional potential opportunity for a route exists between Millwall Stadium and LoveLinch Close via the Renewal site.</p> | <p>Noted - this to be investigated and any amendments made.</p> |
| <p>12 In general the document needs to allow flexibility to maximise local connections and permeability and prioritise pedestrians and cycling. Some figures could be updated to reflect this.</p> | <p>The SPD does this in the setting out of it's key principles. The Healthy Living Streets diagram will be added to further reinforce.</p> |
| <p>13 Access and movement chapter should include the Mayor's strategic modal shift target and should be more specific on what constitutes a route.</p> | <p>Agreed. Mayor's Target to be included and Healthy Living Streets diagram to be provided here.</p> |
| <p>14 It would be useful if the section on Public Realm and Spaces commented on ownership and types of activity encouraged or discouraged in these spaces.</p> | <p>Lewisham will assess as detailed proposals come forward and through the planning process long with all statutory bodies concerned.</p> |
| <p>15 In the Character areas section it would be useful to clarify that cycle parking and entrances should not be hidden from view or other means of</p> | <p>Noted. Detail will be considered as proposals come forward.</p> |

	securing surveillance. The area is within an opportunity area and should be car-free this should be reflected within the character areas along with approach to parking.	
	16 The Stadium area - it is recommended that principle 5 be amended to ensure public access at all times and details of coach and other parking are set out.	Noted, access to be amended. Coach and other parking arrangements would be dealt with in the detail of proposals coming forward.
	17 Principle 3 - the development of a link beneath the East London Line is welcome, further discussion with appropriate stakeholders including TFL is advised.	Agreed
	18 Excelsior - the proximity to the new London Overground station should be considered in greater detail, particularly on how the train to bus interchange would work. Given that development coming forward should be car-free, the creation of links between Rollin St and Surrey Canal and the other north-south routes and east-west routes should be signed as 'access and bus only'.	Agreed - to be considered as details emerge on actual proposals, Access comment to be inserted into SPD.
	19 Timber Wharf - Vehicular access to the plot should be obtained from Rollins St and/or Lovelinch Close - as per above comments re: westward routes.	Noted
	20 Stockholm & Senegal -Stockholm Road will be a pedestrian priority route, only providing access to the plot itself - for vehicles. Cycle routes that are incorporated should be described with greater clarity.	Agreed - although to be considered as details emerge on actual proposals
	21 Bolina Gardens - Facilitating access as shown is welcomed.	Noted
	22 Surrey Canal Road - clear delineation of modes of transport should be designed into the route. Changes in level need to be addressed.	Agreed - although to be considered as details emerge on actual proposals
	23 It is noted that Transport is a requirement for section 106 obligations. However could the requirements be more specific and detailed, clearly prioritising sustainable transport modes. Clarification over 106 and CIL arrangements might be useful along with timings.	The SPD sets out design principles. Details mentioned here are for discussion when actual proposals emerge and as part of planning process.
	24 Infrastructure - could there be a caveat to say the list of requirements is not exhaustive and that there may be additional requirements.	Agreed - text to say the list of requirements is not exhaustive and that there may be additional requirements.to be added
	25 The SPD states that the station will be delivered by TFL using developer contributions etc. - TFL would like to discuss and agree the exact wording for this element and so that it reflects the HIF position.	Agreed - forms part of the detail in the planning process
London Port Authority	1 Given the location of the area in proximity to the River Thames, The Port of London Authority (PLA) has no comments to make.	Noted
Thames Water	1 Consider that the SPD should include a policy relating to water supply and treatment and in the context of considering the whole of the development's needs so as to ensure piecemeal upgrades are not delivered with each phase or that capacity is not impacted elsewhere off-site. A recommended paragraph insert is provided.	Agreed - paragraph on water supply and treatment to be added

	2	Flood risk and SUDS could be mentioned to include sewer flooding. Thames Water request an insert that they have provided to ensure developers provide appropriate provisions.	Agreed - paragraph on Flood risk and SUDS to be added
	3	Sustainability and water efficiency could be referenced and proposed text to be inserted is provided.	Agreed - paragraph on sustainability and efficiency to be added
	4	Housing Allocations - the scale of development is likely to require upgrades to water and drainage infrastructure. It is recommended that developers and the Local Authority liaise with Thames water at the earliest opportunity.	Noted. Lewisham will advise developers to contact service providers to agree connection and any mitigation details as detailed proposals come forward.
Sport England	1	The document could be more specific on what new facilities will be provided and around meanwhile uses - if they are retained or re-provided elsewhere off site.	Noted and agreed, paragraph to state that all existing and meanwhile uses will be retained on site. Any future loss or re-provision off site will need to be justified in Policy terms
	2	Sport England currently objects on the grounds that the SPD does not make it clear that existing and meanwhile uses will be retained.	Officers have spoken with Sports England who have indicated that subject to appropriate wording, they will not maintain their objection
National Grid	1	National Grid identifies underground electricity cable BR1704 66KV CABLE as falling within the development area. From the information provided the cable does not interact with any of the proposed development area.	Noted
	2	Gas - There are no High pressure apparatus but there may be medium to low gas distribution networks, developers should contact the National Grid for any further information and to discuss development impacts on National Grid infrastructure.	Noted. Lewisham will advise developers to contact service providers to agree connection and any mitigation details as detailed proposals come forward.
CBRE on behalf of Millwall Football Club	1	Millwall Football Clubs over-riding comment is one of support.	Noted
	2	MFC has a long established presence in the area and is strongly supportive of the area's regeneration where this supports the needs of the football club and local community.	Noted
	3	Ask to consider that new and emerging documentation including the extension of the Local Plan should be acknowledged and that previous quantum's for example may no longer apply given the emergence of new documentation. The principle of review should be considered.	Lewisham is aware of the Mayor's intent to publish a new Local Plan. The SPD will be monitored on an ongoing basis to ensure that it is relevant and accounts for new relevant Policy. The Council's core strategy sets out policy for SSA3 which remains unchanged.
	4		

	MFC would like to place more flexibility on the Lion Centre so that in the future, if this requirement were no longer needed then land could be re-purposed.	The Lion's centre provided valuable community facilities and services to Lewisham and Southwark communities. Any loss would need to be justified in Policy terms.
5	MFC is supportive of the overall approach to height as illustrated	Noted
6	MFC seek clarification on height and the type and range of uses that would be possible on the Stadium Land Parcel.	Height constraints and opportunities are identified in the SPD. Detail would need to be considered as part of the planning process and proposals emerge. The site is allocated for mixed-use, Policy SSA3 of the Borough's core strategy document sets out the over-arching requirements.
7	Reference should be made under the 'Sports Facilities' section that this does not include the MFC stadium but refers solely to Timber Wharf.	Agreed
Southwark	1 Have asked for a week extension as they have been trying to finalise their Local Plan.	Lewisham will work with Southward to address any issues as development comes forward.
Historic England	The main concerns are around scale of development and testing heights in respect of views and settings.	Noted. The SPD sets out the opportunities and constraints around these themes. HE will be consulted as detailed proposals emerge and through the planning process.

Web survey - 8 respondents

Question 1 Summary

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

1	Retain characteristics of being a former Canal.	Noted. The SPD seeks to retain and enhance Surrey Canal Road and enhance cycling /pedestrian links. Plans for a new station also provide opportunities for further enhancement.
2	Maintain links to docklands heritage.	Locally significant buildings such as Rollins House will be retained.
3	Access to green space and views across London from BridgeHouse Meadows.	The SPD seeks to secure improvements for BridgeHouse Meadows through developer contributions. Important views are referenced in the SPD and any other views will be assessed as part of the planning application process as proposals come forward.
4	There is a small Artist's community in the area, to maintain this and provide space for them would be positive.	Within the Character areas; the SPD sets out opportunities for various uses and forms of activity which include those for the creative industries.
5	No, the defining quality of the area is one of neglect.	Noted. The SPD is intended to guide and define development that provides a high quality environment with character and sense of place.

Question 2 Summary

(What improvements could be made the area)

1	The area needs regenerating.	Noted. The SPD is intended to guide and define a high quality environment with character and sense of place.
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| 2 | There are some important community organisations but facilities and the area generally is run down. | Within the Character areas the SPD sets out opportunities for various uses and forms of activity which include those for community uses. |
| 3 | The walkway from Folkestone Gardens along Surrey Canal Rd to the new development and station needs to be made cleaner and safer, it is a very highly trafficked /unpleasant for cyclists and pedestrians. | Noted. The SPD seeks to retain and enhance Surrey Canal Road and enhance cycling /pedestrian links. Plans for a new station also provide opportunities for further enhancement. |
| 4 | There is a lack of facilities/ shops and amenities such as gyms in the area | Policy SSA3 sets out the requirements for development. The SPD seeks to further encourage mixed use development which includes new public amenity and facilities which will serve the wider area. |
| 5 | The nearest stations are a long walk away and feel unsafe. Better transport links and improved public realm are needed. | Pedestrian and Cycle improvements for existing links and connections are a requirement of the SPD and a new train station at Surrey Canal Road is planned. Detail will be considered through the planning processes development comes forward. |
| 6 | Surrey Canal Road is dangerous at night - cars speed along it. | The SPD seeks to make improvements to Pedestrian and Cycle routes along Surrey Canal Road along with introducing new and improved crossing points. Details of traffic management will be considered as development comes forward and through the planning process. |

Question 3 Summary

(Would you like to make any other comments)

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| 1 | The quiet way is a fantastic asset and should be incorporated to include safe pedestrian crossings along it. | As detailed development plans come forward, the Council and other statutory bodies will consider the detail of access and movement. The key principles are set out in the SPD and include the quiet way. |
| 2 | The planning guidance looks great but do not leave it another 10 years. | One of the purposes of the SPD is to set out expectations and provide all (including developers and land owners), with the confidence and assurance necessary, to know what is expected. This will help speed up the regeneration of the area. |
| 3 | The housing crisis is happening now, do not leave this any longer to be tied up in speculation or planning. | As per point two in question three above. |
| 4 | Existing safety concerns along Grinstead Road (borders Deptford Park) Inwen Court who would like to see a 7 foot barrier constructed with CCTV surveillance and mid-height lighting. | Noted. Existing concerns around safety will be passed on to the relevant agents. This does fall outside of the immediate SPD area however it would be inappropriate for the Council to construct anything that causes severance of communities. |
| 5 | Concern from existing creative community around current facilities and threat of CPO's. | Noted, the Council will work to ensure concerns are addressed or mitigated through the detail of the planning process. |
| 6 | Concern over retention of Rollins House and context. | The SPD states that Rollins House will be retained. Context will be assessed as detailed development plans come forward as part of the planning process. |

Drop in session - 5
visitors

Comments on amenity and transport and general /overall development plans

- | | | |
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| 1 | All very supportive of a new station - and as soon as possible | Noted. The HIFF funding defines the timescales for this. The station is an important proposition in the SPD and to a degree; development is dependant on the station coming forward. |
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2	Keen for there to be swimming facilities	Policy SSA3 in the core strategy defines the requirements which have been consulted upon and agreed , the Council will work to secure these requirements and any additional benefits for the community.
3	There are some points along Surrey Canal Road around the potential station area on the opposite side, where cycling can be hazardous due to blind spots, this should be considered.	Noted. Principles of access and movement are set out in the SPD. Detail will be considered as development comes forward in the planning process.
4	Match day traffic needs to be well planned.	High level key principles around access and movement are set out in the SPD, the detail will be considered as part of the planning process as development is proposed.
5	Plans look great to start with - very optimistic	Noted. The intention of the SPD is to set the standards and expectations for development so that key principles and good quality design are carried through.
6	Phasing, station should come first, along with improved public transport generally and bus routes for example.	The HIF funding defines timescales for the station however this would mean that the station will come forward very early on in development. The planning process would seek to secure improvements and additions to other forms of public transport as development proposals are submitted.
7	Concern over how SELCHP waste would be dealt with.	Noted. This will be dealt with in the detail of any planning application submissions
8	Please incorporate bike storage at the station.	Noted. The Council will work to ensure this provision is incorporated in the detail of proposals for a new station as a planning application.
9	Lighting along routes to stations should be considered.	Noted. Principles of safe and 'liveable' streets are now covered in the SPD. Details will be considered in any planning application coming forward. (Healthy Living streets).
Other Contextual comments		
10	Old and new could look a bit odd, could there be any improvements to the Windslade Estate housing and the general area /public realm?	The SPD seeks to identify opportunities for enhancing the character and amenity of the local area. Contributions will be required by developers to support local area improvements.
11	The banking of Surrey Canal Road and the entrance/ exit and sides to the station are important characteristics of the area.	Noted. As part of the approach, the SPD seeks to promote and enhance local character and distinctiveness. Details will be considered in the planning process.
12	There are currently no shops or amenity nearby.	The SPD seeks to encourage mixed use development which includes new public amenity and facilities which will serve the wider area. (Land uses diagram and set out in Policy SSA3)
13	The arches could be enhanced with activity.	Noted. The SPD defines key routes, in the access and movement sections, these will be required to conform to the principles of healthy living streets, this includes active street frontages. A diagram setting these principles out will be inserted into the SPD
14	There is some illegal dumping.	Noted, the healthy living streets principles will be incorporated into the SPD and CCTV will be introduced where appropriate in the detailed design stages of any proposals coming forward.

Comments on Height

15 How tall will the development be - it seems very tall.

The SPD highlights the constraints and opportunities around height and massing, it is not appropriate for Lewisham to dictate exact parameters, but exact detail around height and massing will be considered as development proposals come forward and through the planning process

