

1	Avison Young/ Barratt London and The Church Commissioners	General	<p>We write on behalf of Barratt London and The Church Commissioners in representation to the London Borough of Lewisham's (LBL) current consultation on the Draft A21 Development Framework (Dated 13th October 2021).</p> <p>This document is of interest, given that Barratt London is currently working alongside The Church Commissioners to progress redevelopment proposals at Catford Island (the Site), within Catford Town Centre. Please see an appended Site Location Plan for further reference. Broadly, Barratt London and The Church Commissions support the overarching aspirations and vision to recognise the potential for the A21 corridor area to sustainably deliver additional housing (including increased levels of affordable housing) and other regeneration benefits within the A21 area. However, we have identified a number of matters which will require further consideration (predominantly geared towards ensuring that the Draft A21 Framework is as consistent as possible with the London Borough of Lewisham's previously adopted Catford Town Centre Framework).</p>	Notes	Comments have been reviewed and framework amended where appropriate	C
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2	Catford Active Travel	General		Catford Active Travel is supportive of the draft A21 Development Framework. Being an active travel group we have only considered the emerging transport strategy in page 157 onwards.	Noted	No change	NC
3	Historic England	General		<p>Thank you for the opportunity to comment on the above consultation document. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process. Our comments are made in the context of the principles relating to the historic environment and local plans within the National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guide (PPGG).</p> <p>Historic England welcomes the draft Framework, and in particular notes the extensive analysis and preparatory work already undertaken in understanding existing townscape character and its sensitivity to potential types of development. We also note the long-term nature of much of the document and the timescales likely for some of the sites identified before development may</p>	Noted	No change	NC

				<p>come forward. Where relevant sites have not been included in the draft Lewisham Local Plan consulted upon earlier in 2021, we assume they will be subject to similar consultation during the next Plan cycle.</p> <p>We also welcome what we consider the strong emphasis on the historic environment and the need for contextually aware new development throughout the document including as one of the guiding principles. As a result, we consider the document to be very much in conformity with the NPPF and in particular the requirement in para 15 for the planning system to provide a positive vision for the future of a particular area. Given these factors, our comments are very limited in nature and relate to a number of the potential development sites.</p>			
4	Historic England	General		<p>I trust these comments are helpful. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.</p>	Noted	No change	NC

5	Lewisham and Greenwich NHS Trust/ Avison Young	General		<p>Lewisham and Greenwich NHS Trust We write on behalf of the Lewisham and Greenwich NHS Trust (LGT) in representation to the London Borough of Lewisham's (LBL) current consultation on the Draft A21 Development Framework (Dated 13th October 2021). This document is of interest to LGT, who has several land assets within LBL, notably the University Hospital Lewisham (UHL) campus, located in proximity to Lewisham's town centre (please see appended Site Location Plan for reference).</p> <p>Broadly, LGT support LBL's overarching aspirations and vision to recognise the potential for the A21 corridor area to deliver additional housing including significant levels of affordable housing, preserve and enhance the historic environment and improve public realm and movement across the A21 area. However, we have identified a number of matters which will require further consideration. We have set these out below and request that LBL consider these matters during the future consultation and preparation stages concerning the Draft Framework.</p>	Noted	No change	NC
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				<p>Context of Representation</p> <p>Within the Draft Framework, we understand that the UHL site falls into the 'Guide Regeneration' area which is noted as having natural market conditions for development on appropriate sites.</p> <p>The Draft Framework splits the A21 into further character areas and the majority of the UHL site falls within Area 3 (Lewisham Hospital, Park and Greens), with the northern part (Registry Office, Education Centre and car parking) located within Area 2 (Ladywell).</p> <p>Given that the UHL site comprises an important strategic development opportunity within the wider area of Ladywell and Lewisham Hospital, Park and Gardens Character Areas, the emerging A21 Development Framework is hugely relevant to the Trust's future development aspirations at this stage.</p>			
6	Lewisham and Greenwich NHS Trust/	General		<p>We note that the Draft A21 Framework provides guidance on other matters including the opportunity to seek further greening of the A21, improvements to pedestrian and cycle infrastructure, activation of ground floors and for</p>	<p>All development along the A21 will be subject to site specific considerations and considered against relevant adopted policies.</p>	<p>No change</p>	<p>NC</p>

	Avison Young			<p>design to take air quality conditions into account.LGT offer general support for these aspirations, however we consider these matters should be subject to site specific considerations and consideration against relevant adopted policy requirements.</p> <p>Next Steps We trust that the above comments are clear and helpful. We would like to thank you for the opportunity to be involved in the preparation of the Draft A21 Framework. As such, we look forward to receiving confirmation of future consultation stages.</p>			
7	Lewisham Cyclists	General		<p>Lewisham Cyclists are supportive of the draft A21 Development Framework.</p> <p>Being an active travel group we have only considered the emerging transport strategy in page 157 onwards. We support the summary of the baseline report and think it is an accurate depiction of the current situation on the ground: the A21 is a major road that causes severance for pedestrians and has poor cycling provisioning. With high public transport access levels in Lewisham and Catford, this area is an</p>	Agreed	Added paragraph to page 156 Transport Strategy Introduction – The emerging strategy has been developed with regard to TfLs Healthy Streets Approach (reference guidance) and all new development will be expected to demonstrate how	C

				<p>ideal location to reduce the dominance of motor traffic and enable active and sustainable travel. We would suggest the framework should also explicitly reference Transport for London's (TfL) Healthy Streets Approach and how the framework will expect development to include evidence of meeting this approach, through use of the Healthy Streets Toolkit.</p>		<p>they have considered and applied the London Plan Healthy Streets Approach and Toolkit Indicators.</p>	
8	Lewisham Pedestrians	General		<p>We are pleased to see that some of our comments on the Movement Corridor Baseline Study have been included in the draft Framework. We have provided here further comments regarding movement along with comments on housing and commercial developments in general that should apply to new developments along the A21.</p> <p>At the heart of our observations on how movement is approached throughout the document is the idea that people are moving on a north-south axis simply because that is the axis of the road. For people living close to the A21 this is very wrong indeed and the development of more housing along the A21 will make this problem bigger still. Being able to cross the road safely is not only about</p>	<p>The document picks on the importance of improving crossings across the A21 to facilitate east-west movement, including in the overall principles, Introduction and Vision – Spatial opportunities: Movement Network (p16) Spatial opportunities: Character (p17) to name but a few.</p>	<p>No change</p>	<p>NC</p>

			<p>quality of life but it is about life itself – decisions made now are important to future citizens in Lewisham.</p> <p>Main roads can be difficult to cross and they are an obstacle to people on foot - there is no need for people to find themselves cut off from the other side of the road. Where there are shops, the homes of neighbours or just the simple things like a school, a library or a bus stop just across the road - then the place to cross safely should be close, we shouldn't have to wait long and we should never be left standing in the middle of a busy road waiting to complete our crossing.</p> <p>There are, on the one hand, people who are simply passing through our communities. They may be moving within the borough but the vast majority do not have a stake in the quality of the space beyond how quickly they can get through it. These people mainly represent movement along the A21 and include cyclists, motor-cyclists, bus passengers, private motor vehicle drivers and commercial vehicle operators.</p> <p>Work needs to establish the breakdown of these groups, their journey destinations, their points of origin and their mode of transport.</p>			
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				<p>On the other hand there are people who are moving across the A21 and along short stretches of the road. They are nearly all on foot, they represent a majority and they are nearly all residents, learners or workers in the borough. Work needs to be done to put this groups at the centre of movement. Residents of new developments along the A21 will, in the main, be in this group.</p> <p>The A21 is not a neighbourhood and the individual communities along its length have been cut in half by the growing levels of demand for movement along the road (right though communities). The A21 development strategy needs to deal with this severance or create neighbourhoods that face away from the A21 - we prefer the former.</p>			
9	N/A	General		As one of the property owners in the 203-221 Lewisham High Street area I would like to express our serious concerns about the potential negative effect on business possibilities of certain aspects of this very extensive plan. The High Street in Lewisham – like many others – is really under	Addressed above		

				threat and many shops will struggle to survive if their needs are not considered.			
10	N/A	General		It is an optimistic package; too optimistic?	The Framework is a high level document and is deliberately ambitious and optimistic. We recognise that further more detailed work, with the collaboration of TfL will be required to realise this vision. However the Councils future aspirations for the corridor and how this could improve communities along the A21 is unapologetically ambitious.	No change	NC
11	N/A	General		I think its a start but needs to be much bolder in its ambition	We believe the A21 Development Framework sets a bold and ambitious vision for the transformation of the corridor.	No change	NC
12	N/A	General		Promote the comfort of people who need to move along the A21 rather than prioritising vehicles. Make sustainable active travel and public the goal so we can reduce pollution	Notes. We believe the A21 development Framework sets out a clear priority of sustainable transport modes.	No change	NC

13	Natural England	General		Natural England have no comments to make on this consultation.	Noted	No change	NC
14	Woodland Trust	General		<p>The Woodland Trust welcomes this comprehensive and tree-friendly approach.</p> <p>We would welcome the opportunity to discuss and advise further as your plans develop.</p>	Noted	No change	NC
15	TfL	General	BLE	<p>The only mention of the Bakerloo line extension (BLE) is to say that its effects have not been included in the future PTAL calculation, despite this being a major project affecting the A21 corridor, particularly at the northern end.</p> <p>We would have expected the document to provide brief details of the project and identify how BLE implementation would change travel patterns in the future and how this has influenced the development framework, particularly around Lewisham town centre.</p> <p>Furthermore, reference to the BLE running to Hayes and Beckenham should be included, as again there would be further changes to travel patterns and demands placed on the A21 corridor. The site allocations have been prepared with no reference to the BLE or statutory safeguarding for</p>	<p><u>Potential Impact on Travel Patterns</u> A paragraph has been added to the Emerging Transport Strategy to address this point.</p> <p>Safeguarded land required for the Bakerloo Line Extension is shown on the Lewisham Town Centre (South) Character Area Framework Strategy Map and the Ladywell Village Character Area Framework Strategy Map.</p> <p>Safeguarded land required for the Bakerloo Line</p>	<p>The following Paragraph has been Added to the Overarching Guidance - Building Heights section:</p> <p>.</p> <p>The following paragraphs have been added to the introduction to the Emerging Transport Strategy:</p> <p><i>Consideration of the impacts of the potential delivery of an extension to the Bakerloo line</i></p>	

				<p>the project which is a significant concern given the likely impacts on a number of sites.</p> <p>Some of the sites mentioned in Lewisham town centre have been considered for the future delivery of BLE and/or are safeguarded.</p>	<p>Extension is shown on the Lewisham Town Centre (South) Character Area Framework Strategy Map and the Ladywell Village Character Area Framework Strategy Map.</p> <p>Site 1: Molesworth Street was the only potential development site in the consultation draft of the A21 Development Framework that lies within the safeguarded land area for the BLE. This has now been removed as a potential development site further to the Environment Agency not supporting residential development on this site.</p>	<p><i>to Lewisham and beyond should be part of the development of proposals along the A21.</i></p>	
16	Phoenix Community Housing	General	CIL and S106	PCH would encourage the local planning authority to use any methods they can, be it S106 pooling or amendments to the CIL 123 list to	The A21 Framework has been used to inform the emerging Local Plan and growth	No change	NC

				<p>ensure that the proceeds of development within the A21 Development Framework area are re-invested directly into social and civil infrastructure within the corridor itself, and particularly to South Lewisham where active regeneration and investment is much needed.</p>	<p>in the borough has shaped the Infrastructure Delivery Plan (IDP) which sits in parallel. The IDP is the primary document which identifies the necessary infrastructure to support the level of growth over the plan period. The council works with our infrastructure delivery partners to identify existing capacity and future demand. This in turn informs site allocations, S106 requirements and CIL priorities. Please refer to the IDP for more detail.</p>		
17	Lewisham Cyclists	General	Cycling	<p>LC would like the Council to consider upgrading the document in the future to be able to enforce its contents on developers. We believe that major improvement to infrastructure for walking and cycling will be of huge benefit to all development along the corridor, as evidence suggests that enabling more people to choose to walk or cycle can benefit businesses</p>	<p>We have kept the status of the document under review.</p> <p>The Council has already drawn significant sums of S106 from developers for Active Travel and will continue to do so</p>	-	NC

			<p>and also provide lasting benefits to future residents of new developments. Considering the huge benefits that developments along the corridor would stand to receive from improvement to the highway, LC would like to see section 106 funding contributions to be earmarked for the delivery of cycling infrastructure; this should include protected cycle lanes, cycle hubs at stations, dockless electric cargo bike hire stations, TfL Cycle Hire Stations and geofenced areas on ground floor of developments for dockless electric hire bikes and scooters. This is to enable the council to meet its goals for modal shift away from motor traffic and its commitment to net-zero, being transport one of the key contributors to emissions, as well as meeting its Climate Emergency Action Plan, Air Quality Action Plan, Transport Strategy and Corporate Strategy.</p> <p>We would like the council to take a lead role in the development of the active travel strategy at Cabinet level and Strategic Planning level, instead of being delegated to developers. To conclude, we support the emerging Transport Strategy that is part of the</p>	<p>through the planning process. We hope that the A21 Development Framework which will feed into site allocation requirements in the new Local Plan will make this more effective and transparent.</p> <p>Noted.</p>	<p>Has been included as a recommendation of something to be explored further.</p> <p>This recommendation has been located</p>	
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				<p>framework, we believe it shows the potential of high-quality infrastructure being built in this corridor and we call upon the council to take the necessary steps to make it a reality. LC are also supportive of the current in-place TfL Streetspace Lewisham to Catford scheme along the A21 and believe it should stay in place until a permanent scheme is designed and implemented.</p> <p>We have previously made two comprehensive consultation responses to the scheme. Please refer to these responses for our detailed comments on the in-place scheme and how it could be improved: https://lewishamcyclists.co.uk/wp-content/uploads/2020/08/LC-Consultation-Response-A21-Streetspace-Scheme-Final.pdf</p>		within the 'Emerging Transport Strategy'.	
18	N/A	General	Cycling	It is a huge improvement for cyclists. I would never have cycled from the hospital into lewisham centre before along the A21. But I do now - it's still not great under the railway bridge but I appreciate that it is very narrow there.	Noted	No change	NC
19	Catford Active Travel	General	Development Plan	We understand this document being a Development Framework doesn't have the strength of a Development	Noted.	No change	NC

				Plan, we would like the Council to consider upgrading the document in the future to be able to enforce its contents on developers.			
20	Lewisham Pensioners' Forum	General	Elderly residents	For some strange reason I have only just seen this. Had I seen it I would have contributed. I do hope. however, that you have given consideration to the presence of elderly residents in Lewisham. Services and facilities conducive to the needs of the elderly should be on the agenda of every planning meeting.	Noted	No change	NC
21	N/A	General	E-scooters	What about developments like e-scooters and hire facilities for e-bikes - there is a need to futureproof this section.	The installation of e-scooters and e-bikes would be a Boroughwide decision and therefore this is not considered in the A21 Development Framework which is providing specific guidance for the A21 area only.		NC
22	Lewisham and Greenwich NHS Trust/ Avison Young	General	Further consultation	Would you be able to advise whether the Council will be undertaking further rounds of consultation on the draft document? As discussed in the attached, we would appreciate if we could review the heritage evidence base which supports the current identification of	Noted. There will be no further consultation on the A21 Development Framework, as the content of the document has not	2 errors in the categorisation of buildings of townscape merit have been identified and corrected in the latest draft of the document.	C

				<p>various buildings as being of townscape merit.</p>	<p>been altered substantially.</p> <p>The buildings of townscape merit were categorised by Authentic Futures – a heritage consultancy. The buildings located on the Lewisham Hospital site were reviewed by the Council’s Conservation Officer. 2 errors have been identified and corrected in the latest draft of the document.</p>		
23	Phoenix Community Housing	General	General	<p>I am writing on behalf of my client, Phoenix Community Housing (PCH), to provide comments in response to the live consultation on the Draft A21 Development Framework. These comments should be read in conjunction with our representations on behalf of PCH on the Regulation 18 stage document for the emerging Local Plan 2020-2040 which were sent in April this year, and our comments on the Draft Small Sites SPD (now adopted) sent in June.</p>	<p>With regard to the study area - given the scope and budget of the project we have had to keep the study area fairly tight and concentrate on the corridor itself.</p> <p>With regard to the status of the document as a Development Framework it has no statutory weight and does not form part of</p>	<p>Text added to page 4 project introduction. As a Framework document the A21 Development Framework will not be part of the council’s statutory Development Plan and will therefore not carry weight as a Development Plan Document (DPD) or</p>	C

			<p>PCH is a not-for-profit, resident-led housing association which owns and manages more than 6,000 homes in Lewisham. Its primary areas of operation are Bellingham, Whitefoot and Downham, all within the south Lewisham area. PCH therefore represents a key stakeholder within the Borough and have a keen interest in all emerging development plan documents and supplementary planning documents documentation which will have a major impact on the future operations of the association.</p> <p>PCH shares the sentiment that the A21 is a vital artery in the Borough though with much to be desired beyond serving as a strategic vehicular route. There is certainly a fantastic opportunity to drastically enhance its greenery, reduce air pollution, reduce car traffic with public and active transport initiatives, and of course to build homes in the more sustainable places and spaces being created along it. The document is useful and sufficiently ambitious whilst being well-rooted in practicable/achievable interventions and prescriptive means to improve the corridor as a whole. As our Local Plan and Small Sites SPD representations have asserted, all</p>	<p>Lewisham's Development Plan however if endorsed by the council the Framework will be a material consideration when assessing planning applications.</p>	<p>Supplementary Planning Documents (SPD). However it may be a material consideration when considering planning decisions.</p>	
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emerging development plan and supplementary planning documents for Lewisham should reflect the delay of the Bakerloo line extension, which according to reports is at least a decade away from even starting. To that end the A21 corridor should now be a fulcrum of the new Local Plan spatial strategy. Greater emphasis of the role the A21 needs to play over the next plan period is needed and perhaps the Framework should recognise this by encompassing a larger area including key links to the A21.

PCH is pleased to see that all character areas south of Catford (its prime area of operation) are earmarked for active regeneration rather than guided regeneration. This reflects the real patterns of inequality and deprivation in the Borough, with South Lewisham certainly requiring direct investment by bodies such as PCH as the market conditions are not as favourable as in North Lewisham. As aforementioned, PCH contends that the study area should be broadened so that additional sites that are well connected to the A21 can plug-in to the corridor and its vision.

				<p>It is not explicit whether the document will be a Supplementary Planning Document (non-statutory guidance) or a Development Plan Document (part of the statutory development plan), though I suspect the former - meaning it will be a material consideration for planning applications within the defined study area. There are recent examples in other London Boroughs where non-statutory guidance documents such as masterplans and frameworks are being interpreted as the defining policy on matters such as height, massing, and housing mix though. For example, in Greenwich, non-adherence with the prescriptions of the Charlton Riverside Masterplan SPD on height alone has seen schemes judged to be at odds with adopted policies on design/townscape, thus refused on design grounds, even when local design and heritage officers are supportive of the proposals and in more general planning policy terms the schemes are acceptable. There can be tension between strict adherence to an SPG, and what is actually viable for a particular site. To that end, the A21 Framework should give explicit recognition to the fact it should not</p>			
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				be interpreted as a defining policy on any matter, and that development proposals do not need to adhere to every single one of its provisions to accord with its overall vision and purpose.			
24	TfL	General	General	Thank you for consulting Transport for London (TfL) on the draft A21 Development Framework. Although we are broadly supportive of several of the guiding principles we have a number of concerns about the way in which the document has been prepared and presented.	Noted	See other TfL comments and LBL responses that describe specific changes to document that address this comment.	C
25	TfL	General	General	Its status in relation to other Local Plan documents including site allocations is unclear....	The weight accorded to a Framework document is now described in the project introduction.	The following text has been included in the project introduction on page 4: <i>As a Framework document the A21 Development Framework will not be part of the Council's statutory Development Plan and will therefore not carry weight as a Development Plan Document</i>	C

				<p>...and some of the specific transport projects may not be realistic.</p>	<p>It is now emphasised that proposals are at a very early stage and subject to testing.</p>	<p><i>(DPD) or Supplementary Planning Document (SPD). However it may be a material consideration when considering planning decisions.</i></p>	
				<p>There is little information on sources of funding, delivery mechanisms or prioritisation of projects [...]</p>	<p>Providing information on sources of funding, delivery mechanisms and prioritisation is not part of the scope of the document.</p>	<p>The following paragraph has been added to the project introduction (penultimate paragraph) on page 4 and to the introduction to the Emerging Transport Strategy:</p> <p><i>The transport proposals are at an early design stage and require further investigation and consideration to determine if they can be taken</i></p>	

				<p>[...] and there are a number of errors that have crept into both the main document and the emerging transport strategy.</p>	<p>Errors have been corrected.</p>	<p><i>forward. This will involve collaborative working between TfL and the London Borough of Lewisham and other interested parties such as Network Rail and the TOCs There may be other transport priorities that take precedence over the concept proposals provided in the document in the future, which will be dependent on future broader movement strategies and transport hierarchy.</i></p> <p>The following paragraph has been added to the end of the project introduction:</p>	
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						<p><i>The identification of potential funding sources, delivery mechanisms and the prioritisation of public realm and transport projects will need to be undertaken as proposals are developed.</i></p> <p>Errors have been corrected.</p>	
26	TfL	General	General	It is unclear what status any final document would have in relation to statutory site allocations in the Local Plan.	Additions have been made to the Project Introduction to provide further clarity on the status of the document.	<p>The last paragraph in the Project Introduction on page 4 has been amended as follows:</p> <p>Wider policy context The A21 Development Framework has been developed</p>	

				<p>We have not commented on most of the individual site allocations although we have concerns about some of the associated transport proposals.</p>	<p>alongside a number of existing local, and national policy documents. This framework should be read alongside the Lewisham Local Plan, the London Plan, the National Planning Policy Framework <i>and national, London and Lewisham transport policy and guidance.</i></p> <p>The following paragraph has been included on page 4 in the introduction:</p> <p><i>As a Framework document the A21 Development Framework will not be part of the council's statutory Development Plan and will therefore</i></p>	
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					<p><i>not carry weight as a Development Plan Document (DPD) or Supplementary Planning Document (SPD). However it may be a material consideration when considering planning decisions.</i></p> <p>The following paragraph has been added to the Potential Development Sites Introduction:</p> <p><i>5.6 Transport proposals provided within the capacity studies are subject to testing against transport policy and guidance and consideration of funding and delivery arrangements.</i></p>	
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27	LBL Planning Officer Comment	Charact er Area Frame works	Ladywell Village Character Area	Ladywell Village Character Area is referred to as Ladywell on the Character Area Frameworks page on page 8. It should be given a consistent title.	Noted	The Ladwell Village Character Area has been given its full title wherever it is referred to.	C
28	LBL Planning Officer	General	Legibility of Document	The names of the potential development sites should be included in the contents pages for ease of reference.	Noted.	The names of the potential development sites have been included in the contents pages for ease of reference.	C
29	NHS London Healthy Urban Developm ent Unit	General	Lewisham Hospital	<p>Thank you for the opportunity to respond to the Council's proposed A21 Development Framework. This is a very detailed piece of work and generally welcomed.</p> <p>While the Lewisham Hospital site is excluded from the framework it is an important part of the area. Lewisham and Greenwich NHS Trust, the CCG and wider health partners look forward to continued engagement with the Council regarding the site and its linkages to the wider area and community.</p> <p>While the baseline study which accompanies the consultation is very</p>	Noted. The baseline study is not part of this consultation process.	No change	NC

detailed and not subject to consultation it is important to note that the data behind the Indices of Deprivation is several years old (section 3). The text refers to Lewisham improving its rankings on several of the domains including Health and Disability and then continues that challenges exist in other domains. The Indices will not reflect the impact of the ongoing pandemic on mental and physical health and wellbeing, and critically the ranking is a comparative indicator and therefore a lower ranking does not necessarily mean health measures have improved or the challenge is not still significant.


There appears to be no reference to an urban green audit across the corridor. Areas of open space are described in detail, however, less green areas with the potential of greening, through green walls, new tree cover etc do not appear to be identified. Given how green infrastructure contributes to supporting mental health and wellbeing and encourages active travel this should be fully explored and reflected in the next iteration of the framework.

30	Landsec Lewisham Limited	General	Lewisham Shopping Centre	<p>On behalf of Landsec Lewisham Limited (“Landsec”), please find enclosed representations on the A21 Development Framework Consultation (“the Draft Framework”).</p> <p>By way of background, Landsec is the owner of Lewisham Shopping Centre. During 2020 Landsec undertook a feasibility exercise, consulting with both the Council and local community to consider the redevelopment of Lewisham Shopping Centre.</p> <p>Landsec has now begun the process of preparing a planning application for the comprehensive redevelopment of the existing shopping centre to deliver new homes alongside retail, leisure, cultural and other town centre uses. The objective is to submit the planning application in 2022.</p>	Noted	-	NC
31	Landsec Lewisham Limited	General	Lewisham Shopping Centre	<p>General Comments</p> <p>More generally, we support Guiding Principle #1 (set out on page 7 of the Draft Framework) which is to ‘Maximise the delivery of new homes to meet borough shortfall needs’ and the supporting text which refers to increasing housing density and increasing massing beyond prevailing building height in appropriate areas. We also note that this Guiding Principle has been applied to Potential Development</p>	Noted. However, it should also be noted that the Molesworth Street Car Park has been removed as a potential development site as it lies within a Flood Zone 3B site.	-	S + NC

				Site 1 (Molesworth Street) and Potential Development Site 2 (Land at Engate Street) which are adjacent to Lewisham Shopping Centre and both refer to maximising the delivery of new homes to meet borough shortfall needs. We see the redevelopment of Lewisham Shopping Centre as also making a significant contribution to the borough's housing needs.			
32	LBL Planning Officer Comment	Character Area Frameworks	Lewisham Town Centre Character Area	Lewisham Town Centre is not an appropriate name for the most northern character area as the guidance does not cover the whole of Lewisham Town Centre	Noted	The character area name has been changed to <i>Lewisham Town Centre (South)</i> .	C
33	Lewisham Pedestrians	General	Pedestrian	Work must be done to create safe crossing at intervals of no more than 100 metres at places where people want to cross the road or at places that there is great potential for people to cross the road. This idea is entirely in line with a strategy to build more homes close by the A21.	Agreed	Added principle to page 163 – <i>Provide additional, safe crossing points, where possible</i>	C
34	Lewisham Pedestrians	General	Pedestrian	None of the pedestrian facilities at the light-controlled junctions currently on the A21 have a pedestrian facility on all arms (north/south or east/west).	The council will continue to work with TfL to improve crossings along the corridor	No change	NC
35	Lewisham Pedestrians	General	Pedestrian	We are concerned about the use of the word "generous" to describe some footway widths. The	We use the word generous in this context to mean wide which the majority of	No change	

				Healthy Streets indicators guidance provides more information about what a “good” footway width might be and how to measure it content.tfl.gov.uk/healthy-streets-explained.pdf and https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets#on-thispage-1	the footway are along the A21 corridor.		
36	Lewisham Pedestrians	General	Pedestrian	Reference is made to informal crossings in the <i>Emerging Transport Strategy</i> . We would say that informal crossings like these along such a busy wide road encourage risky behaviours from people wishing to cross the road.	The emerging transport strategy does not support informal crossings over the A21 and emphasises the importance of providing safe crossings.	-	NC
37	Lewisham Pedestrians	General	Pedestrian	On p.28 the benefit of speed tables is that “raising the crossing puts drivers at eye-height with pedestrians”. This is quite wrong. It is also put in a section entitled “improving cycling infrastructure”!	Agreed	text changed to “ <i>raising the crossing slows down vehicles</i> ”	C
38	Lewisham Pedestrians	General	Pedestrian	May it be arranged that Lewisham Pedestrians work with Heyne Tillet Steele to help create a Transport Strategy that reflects the needs of pedestrians?	We recognise that further work needs to be done on the Transport Strategy for the A21 but this will have to be taken forward at a later date. When this work does re-commence we will ensure key-	No change	NC

					stakeholders are consulted.		
39	Lewisham Pedestrians	General	Pedestrian	The crossings on the A21 should be re-examined with the view that pedestrians – vulnerable pedestrians in particular - need to feel safe on the footway and shared crossings can be dangerous and frightening.	Noted. The Framework is a strategic document and we recognise that further work is required. This level of detail will be explored in the future.	No change	NC
40	Lewisham Pedestrians	General	Pedestrian	There are many references in the draft Framework to “London Squares” – but these are spaces that are defined in the London Squares Preservation Act 1931. Here the legal term appears to have been appropriated to simply mean small patch of grass or some shrubs.	Noted.	<p>The first time that the designated London Squares are referred to it is stated that they are defined in the London Squares Preservation Act (1931). - Paragraph 1.25,</p> <p>When they are referred to subsequently they will be followed by a “*” and there will be a footnote on the page stating the following:</p> <p>* The London Squares were designated by the</p>	

						<p>London Squares Preservation Act 1931. p17</p> <p>Reference have been clarified to indicate London Squares vs new linear spaces?</p> 	
41	Lewisham Pedestrians	General	Pedestrian	Developments should be permeable for people walking - this means increased permeability so that residents are given access in all directions that have now, or may reasonably have in the future, access to the public realm.	Noted	No change	NC
42	Lewisham Pedestrians	General	Pedestrian	Maintain at least 60mm kerbs to separate pedestrians from vehicles (including bicycles) with white painted tops. This not only re-enforces safe	Too much detail for a Framework document	No change	NC

				separation but also helps younger children, people with vision-impairment and dogs to identify the kerb edge.			
43	Lewisham Pedestrians	General	Pedestrian	Residential and commercial waste should not be stored on the footway at any time. This includes during collection times as well as storage. Applications for development should show how this will be achieved. This will encourage walking by making navigation for pedestrians safer.	Too much detail for a Framework document	No change	NC
44	Lewisham Pedestrians	General	Pedestrian	The amount of space in developments given over to service functions should be demonstrably minimised. Attention is drawn to the Create Streets document "The bin-lorry effect" where this principle is detailed. This will encourage walking by making navigation for pedestrians both easier and safer.	Too much detail for a Framework document.	No change	NC
45	Lewisham Pedestrians	General	Pedestrian	Service boxes (including EV charging facilities) should not be located on the footway.	Too much detail for a Framework document	No change	NC
46	Lewisham Pedestrians	General	Pedestrian	Developments should design-out crime by ensuring that all public spaces are overlooked from commonly used windows in dwellings. This may impact, for example, on the use of ground floor accommodation being used far more extensively for residential use rather than service, commercial or storage. This	This is covered within existing, adopted planning policies.	No change	NC

				arrangement will encourage people to walk to, from and within developments.			
47	Lewisham Pedestrians	General	Pedestrian	Safety lighting should only use lighting columns placed on the footway as a last resort. Where a development application uses this last resort then they must show that comfortable widths for people walking have been maintained.	Too much detail for a Framework document	No change	NC
48	Lewisham Pedestrians	General	Pedestrian	Footways on new developments should be demonstrably wide enough to allow two people to walk alongside each other, wheelchair users and buggies to pass and for people to comfortably pause and linger without feeling as though they are obstructing others.	This is covered within existing policies and guidance.	No change	NC
49	Lewisham Pedestrians	General	Pedestrian	The government have recently announced that the new cycling and walking infrastructure strategy (CWIS 2) will reflect the new policies outlined in Gear Change and LTN 1/120. Significantly this will mean that "cyclists are vehicles" and that "cyclists and pedestrians should not share the same spaces". These principles should inform the <i>A21 Development Framework</i> and should apply to all shared public and private realms.	Noted. The Framework is a strategic document and we recognise that further work is required. This level of detail will be explored in the future.	No change	NC

50	Lewisham Pedestrians	General	Pedestrian	There should be a clear and well maintained dedicated pedestrian route from primary building entrances to the footway in the public realm. This should apply equally to small and large developments. Hard standing storage for motor vehicles should not be considered as part of a pedestrian route.	Too much detail for a Framework document	No change	NC
51	Lewisham Pedestrians	General	Pedestrian	Development applications that include any crossovers must demonstrate the use of both contrasting colour and texture surfaces to indicate a hazard. This will encourage people to walk by reducing the risks arising from the introduced hazard of collision with moving vehicles. This especially applies to children, people with vision impairment and people relying on guide/assistance dogs.	Too much detail for a Framework document	No change	NC
52	Lewisham Pedestrians	General	Pedestrian	Development applications that include kerbed vehicle access across the footway must demonstrate that absolute pedestrian priority is clearly indicated.	Too much detail for a Framework document	No change	NC
53	Lewisham Pedestrians	General	Pedestrian	Place all residential parking (except disabled parking for residents and visitors) to the edges of developments so that if private vehicle ownership declines then that space can be re-purposed as green space.	Parking policies are covered Lewisham's development plan documents.	No change	NC

54	Lewisham Pedestrians	General	Pedestrian	Residents of new single and multiple dwellings should not be allowed Lewisham residential on-street parking permits. This condition would apply to all future residents and would also exclude those residents from participating in controlled parking zone consultations.	Details on who is eligible for Lewisham Resident Parking Permits can be found at the Council website	No change	NC
55	Lewisham Pedestrians	General	Pedestrian	Each off-street motor vehicle parking space must have electric-vehicle charging functionality – this should apply to all applications that include any motor vehicle storage space.	Too much detail for a Framework document	No change	NC
56	Lewisham Pedestrians	General	Pedestrian	Applications for electric charging facilities on the private realm that has any public pedestrian access must demonstrate that no trip hazards are introduced.	Too much detail for a Framework document	No change	NC
57	London and Quadrant Housing Trust	General	Planning policy context	L&Q realises the value of a clearly defined planning context to encourage growth and investment in the corridor, but particularly the delivery of much needed housing. As a key stakeholder in Lewisham, we welcome the opportunity to contribute to emerging planning policy and would welcome further engagement with LBL in future consultations.	Noted	No change	NC
58	LBL Planning Officer		Public Engagement	Public engagement activities should be described.	Noted.	A section on public engagement activities has now been included.	C

59	London Borough of Lewisham	General	River Ravensbourne	I am glad to see that the river became an integral part of the document and opportunities are flagged for improving accessibility. It should be emphasised that wherever possible this accessibility should not just be a view of the river or a path that runs 5m above the water but physical access (e.g. breaking the river out of the concrete channel, steps)	Agreed	Paragraph added to page 15 Green and blue infrastructure. Wherever possible the river should be renaturalised in line Lewisham's River Corridor Improvement Plan SPD.	C
60	London Borough of Lewisham	General	River Ravensbourne	In general I am glad to see that the river and greening is an integral part of the document now. Ecology and biodiversity considerations could still be more prevalent and I made some suggestions regarding this in my response.	Noted – these have been picked up separately	No change	NC
61	Quaggy Waterways Action Group (QWAG)	General	River Ravensbourne	<p>The strategy as set out on pages 47 and 48 suggests that the river would only be improved “to make the river path attractive” and to “Increase planting and make the River Ravensbourne and other natural assets more accessible”.</p> <p>Page 50 hints at “Opening up the river will strengthen the green and blue network” and the artist's impression used suggests some potential river restoration, but that is not made explicit.</p>	Noted.	<p>Paragraph added to page 15 Green and blue infrastructure:</p> <p><i>Wherever possible the river should be renaturalised in line Lewisham's River Corridor Improvement Plan SPD.</i></p>	

Similarly vague references to potential improvement are made on subsequent pages, for example:

- Page 66 - “New employment uses that address the riverfront in a positive way” – it is not clear how new development would affect the river in a positive way. Proximity to the river can benefit a development without benefiting the river and river corridor;

(It should be noted that the Selco development was a major missed opportunity, and it is not clear how the Framework will not repeat that – page 66);

- “River path could be opened up along boundary of industrial park” – but there is no mention of what this would actually mean for improving the river and to address its poor condition; and,
- “Enhance river embankment with additional tree planting and environmental improvements” – this is also too vague to know what this would mean. Tree planting in and of itself is not necessarily a benefit to the river

				<p>especially if planted too close and allowed to cast shadow.</p> <ul style="list-style-type: none">- Page 67 - “Direct access to greenway along Ravensbourne River” – it is not clear what this entails but given the paucity of ecological approach in the Framework to this point, it is taken to mean low grade, opportunistic amenity planting and superficial greenery.- Page 78 - “Increase tree planting and make the River Ravensbourne and other natural assets more accessible”.- Page 115 - “Opening up a new link to the river” and “Increase tree planting and make the River Ravensbourne and other natural assets more accessible”- Page 116 - “Access to river currently blocked on neighbouring properties”- Page 119 - “Opening up a new link to the river while providing new large green space for the neighbourhood” and “Use network of green and blue space			
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				<p>as a buffer from road and industrial estates”</p> <ul style="list-style-type: none"> - Page 123 - “Creating towpath along Ravensbourne River”, “Providing commercial frontage along the road and the river”, and “Add greenery to enhance biodiversity along the river” - Page 127 - “Add greenery to enhance biodiversity along the river and green London Squares (linear pocket-parks) edge along A21” - Page 139 - “Increase tree planting and make the River Ravensbourne and other natural assets more accessible” 			
62	LBL Planning Officer	General	Section titles	<p>“Typological Guidance” would be a more accurate heading for the “Design Guidance” section and this is consistent with the title given to this section within the document chart on page 4.</p> <p>The Potential Development Sites section is incorrectly titled as “Site Capacity Studies” in the document structure chart. It should be titled “Potential Development Sites. “</p>		<p>The heading of the “Design Guidance” section has been changed to “Typological Guidance”.</p> <p>On the document structure chart on page 4 “Site Capacity Studies” has been replaced</p>	C

						with "Potential Development Sites".	
63	Avison Young/ Barratt London and The Church Commissioners	General	TfL	<p>Whilst the document relates to the wider A21 corridor area within Lewisham (and relates to sites located adjacent to this road), it does not currently appear to refer to Transport for London's (TfL) current aspirations to re-route/realign the South Circular road.</p> <p>Given that TfL's aspirations, if delivered, will help to further promote regeneration and healthy/safe movement through Catford, we consider that the Draft A21 Framework should align with TfL's intentions as much as possible. We therefore recommend that the Draft A21 Framework be reviewed and updated to reflect this context.</p>	Agreed	Reference added on Page 45 to the South Circular realignment to promote the regeneration of Catford Town Centre.	C
64	TfL	General	TfL	<p>The only mention of TfL in the main document is on page 23 in relation to Healthy Streets guidance. Apart from this single mention there is no reference to any of the guidance documents published on our website such as Streetscape Guidance, London Cycling Design Standards or Accessible Bus Stops that are all applicable.</p> <p>It is only in the introduction to the emerging transport strategy that</p>	We have corrected and emphasised TfL's authority over the A21 and list relevant TfL guidance in the introduction to the emerging transport strategy.	<p>The following information has been added to both the project introduction and the introduction to the emerging transport strategy.</p> <p><i>The A21 forms part of the Transport for London Road</i></p>	

			<p>there is an acknowledgement that ‘The A21 is part of TfL’s Strategic Road Network and all decisions to alter the layout of the A21 would require authorisation from TfL.’ Even this statement is incorrect because the A21 is part of the TLRN and it is not just changes to the road layout that would require authorisation from TfL.</p> <p>The main document needs to state clearly that the entire length of the A21 forms part of the TLRN and that TfL is the landowner, highway, traffic, signalling and public transport planning authority.</p> <p>References to the Mayor’s Transport Strategy objectives, Good Growth, Vision Zero and mode split targets would all have been helpful to set the context.</p> <p>The document also needs to balance competing demands on the A21 corridor.</p> <p>It would have been helpful to emphasise the importance of buses along this corridor and the need to accommodate freight movements. The challenge of integrating cycling</p>	<p>The Mayor’s Transport Strategy objectives are now be referred to in the A21 Development Framework.</p> <p>The A21 Development Framework now refers to the variety of</p>	<p><i>Network (TLRN) and as such TfL is the landowner, highway, traffic, signalling authority for the corridor. It is also a key bus corridor. TfL is the strategic transport authority for London and it has an important role in the planning and provision of most public transport in London, support for active travel and the development of transport projects including the Bakerloo Line Extension as well as the management of traffic through Lewisham and for London overall.</i></p> <p>The following paragraphs have been added to</p>	
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			<p>and bus infrastructure needs to be recognised.</p> <p>The effect of the proposed guidance and projects on the comfort and safety of all road users including people walking and cycling and bus passengers needs to be taken into account.</p> <p>All proposals would need an Equalities Impact Assessment carried out during the design process.</p>	<p>transport modes that use the corridor.</p> <p>The role of buses was already included in the consultation draft of the A21 Development Framework in the Emerging Transport Strategy on page 157 where it states the following:</p> <p><i>It provides an important bus corridor between Bromley and Lewisham Central, and beyond</i></p> <p>However, the role of buses has now been further emphasised.</p> <p>This is not within the scope of this document but this assessment will be undertaken at a later design stage</p>	<p>both the document introduction to the emerging transport strategy:</p> <p><i>Buses play an important movement role along this corridor, providing access to and supporting local centres, enabling access to jobs, schools and other services and providing links to rail stations. The need to accommodate freight movements as well as general traffic and the challenge of integrating walking, cycling and bus infrastructure and movements are recognised.</i></p> <p><i>When transport and public realm</i></p>	
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				<p>which is now stated in the Introduction to the Emerging Transport Strategy.</p> <p>Noted.</p>	<p><i>proposals are developed for the A21 they must adhere to all relevant guidance and best practice and seek to improve the comfort and safety of pedestrians, cyclists and bus passengers alongside the reliability of bus services and the opportunity for the network to adapt to change.</i></p> <p><i>Transport proposals should conform with the Mayor's Transport Strategy objectives including Good Growth, Vision Zero and targets for mode shift and follow TfL guidance including Streetscape Guidance, London Cycling Design</i></p>	
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					<p><i>Standards and Accessible Bus Stops. They will also need to balance competing demands for roadspace.</i></p>	
					<p>The following paragraph has been added to the end of the introduction to the Emerging</p>	

						<p>Transport Strategy:</p> <p><i>All proposals would need an Equalities Impact Assessment carried out during the design process.</i></p>	
65	LBL	1 Introduction and vision		<p>Correction. Paragraph 1.8 states that there are 7 character areas but there are 8.</p>	This has been corrected	<p>Paragraph 1.8 corrected to state there are 8 character areas.</p>	C
66	London and Quadrant Housing Trust	1 Introduction and vision		<p>L&Q welcome the Council's consultation on the A21 Development Framework which seeks to optimise housing and social infrastructure in this part of Lewisham. We support the Council's six Guiding Principles for the Vision of the corridor.</p> <p>In particular, we support Guiding Principle 1- Maximise the delivery of new homes to meet borough shortfall needs, and promotion of opportunities to increase housing density by increasing building heights where appropriate.</p>	S		NC

L&Q also supports the proposals set out in the other Guiding Principles. We agree that improvements to social, environmental and transport infrastructure are important to support new housing delivery. We recognise the need to promote sustainable modes of transport to help improve air quality in the corridor. We understand the need to manage the scale and character of development in the area, including any heritage value.

We support Lewisham's vision in creating spatial opportunities to maximise untapped development potential. We recognise the different character of the northern and southern parts of the corridor and understand the council's approach to "guide regeneration" in the north and "identify areas for intensification and regeneration" in the south. This categorisation is useful to understand the different scales of development that are appropriate in different parts of the corridor.

We strongly support the delivery of higher density residential development in and around public

				<p>transport nodes however L&Q believes that in order to help address the housing crisis, increased housing density must also be delivered in the more suburban, southern parts of the corridor.</p> <p>Overall, L&Q welcome the council's approach to delivering growth on the A21 Corridor and the potential to enhance the character of the opportunity areas and access to the River Ravensbourne.</p>			
67	N/A	1 Introduction and Vision		<p>More emphasis needed on current east- west links and how they could be strengthened as new links will be difficult.</p>	<p>As this is a strategic document, it is not possible to go in to more detail regarding how existing east-west links can be improved.</p> <p>Existing east-west routes are shown in the Spatial Opportunities: Movement Network Section of the document</p>		NC
68	N/A	1 Introduction and Vision		<p>Too much focus on opportunities, need a section on constraints if only to manage expectations.</p>	<p>Constraints are described in the Character Area Frameworks and the Potential Development</p>		NC

					<p>Sites sections of the documents.</p> <p>Further detail on constraints would be established as and when the detailed design process for proposals progress.</p>		
69	N/A	1 Introduction and vision		<p>There's too much focus on building which means more traffic and more demand on local services. the environment and sustainability need to be top priority.</p> <p>"buildings are positioned and designed along A21 can improve air ventilation and as a result improve air quality on the streets" - This is not good enough, this is just moving around pollution instead of reducing it and tackling it at source.</p> <p>There needs to be bolder thinking and real push for behaviour change for more sustainable transport and not promote a 'business as usual approach'</p> <p>segregated cycle lanes and better connections to waterlink way/river are a MUST for pedestrians and cyclists. Improving walkways and pavements is important but car use must be equally discouraged through</p>	<p>The document promote increasing walking and cycling rather than travelling by car along the A21.</p> <p>Further guidance regarding how sustainable transport should be improved in the Mayor of London's Transport Strategy. Further information is available at the following link: https://tfl.gov.uk/corporate/about-tfl/the-mayors-transport-strategy</p> <p>However it is also acknowledged that there will still be pollution caused by</p>	<p>The Waterlink Way is now shown on the Spatial Opportunities Movement Network Map.</p> <p>The following sentence has been added to the end of the first paragraph:</p> <p><i>Improving East-West connections between the A21 and the Waterlink way is a priority to facilitate walking and cycling between Catford and Lewisham Town Centre.</i></p>	C

				<p>reduction of parking and narrowing of roads. For instance the huge space at Bromley Road Retail Park strongly encourages people to drive (even to the gym!) these space need to discourage driving or at least encourage cycling and public transport.</p> <p>The time scale for change must be drastically reduced with concrete action plans.</p>	<p>vehicular traffic on the road which is why the document also shows that the design of buildings can play a role in enabling the pollution to rise and move away from the street to minimise the damage it may cause.</p>		
70	N/A	1 Introduction and vision		<p>Fully support the vision, please just don't make the new buildings ugly like the ones that are popping up in Lewisham centre.</p>	<p>To achieve planning permission all development would need to meet design policy requirements set out in Local, London Plan and National Planning Policy.</p>		S and NC
71	Catford Active Travel	1 Introduction and vision	Baseline	<p>We believe the summary of the baseline is an accurate depiction of the current situation on the ground: the A21 is a major road that causes severance for pedestrians and has poor cycling provisioning. With a high PTAL in Catford this area is an ideal location to reduce the dominance of motor traffic and enable active and sustainable travel.</p>	S		NC

72	LBL Planning Officer	1 Intro duction and Vision	East-West Links, page 16 Spatial Opportunit ies Movement Network	The font with the routes smaller than the rest of the text.	Noted.	Font size is now consistent with other text.	C
73	LBL Planning Officer	1 Intro duction and Vision	East-West Links, page 16 Spatial Opportunit ies Movement Network	The document should make clear that the railway is a significant barrier to east-west travel to the west of the study area.	Noted.	The railways are now identified in the key on the map for this page. The following text has been included after the list of east-west routes: It should be noted that the railway is a significant barrier to east-west movement to the west of the A21.	C
74	NHS London Healthy Urban Developm ent Unit	1 Intro duction and vision	Guiding principle 1	We support the principle of maximising housing, particularly genuinely affordable housing, and housing which will meet the needs of those homeless, facing homelessness, and with additional needs not easily met by the private market. Homes for health and care workers and other key	Whilst it is recognised that bringing vacant property in to use to provide residential accommodation is important, this will not be included in the A21 Development		NC

				workers is also a need which the framework area may help address. There appears to be little reference to bringing vacant space within existing properties into residential use. While the potential difficulties of converting office blocks and other commercial to residential use, particularly through permitted development rights, can produce poor quality housing, there are significant numbers of vacant upper floors along the A21 many originally in residential use which could provide valuable housing. The would also contribute to natural surveillance, and economic and social regeneration There are many successful examples of 'Living Over the Shop' schemes (LOTS).	Framework as it is not a Planning matter.		
75	NHS London Healthy Urban Development Unit	1 Introduction and vision	Guiding principle 2	The first sentence "The A21 contains lots of social infrastructure." needs to be clarified and caveated. Yes, it does accommodate a significant quantity of social infrastructure including Lewisham Hospital (excluded from the framework) however, this social infrastructure is under substantial pressure and underinvestment and will serve different catchment areas, neighbourhood, borough and cross borough. Some infrastructure will serve a particular part of the A21 and its hinterland, and of a high quality for	Noted. Text is now provided to explain that infrastructure planning is undertaken within the Infrastructure Development Plan. Many of these sites are within the Local Plan and a housing trajectory can be found	Guiding Principle 2 has been changed as follows: <i>Guiding Principle #2 Strengthen the distinctiveness of local centres, enhance the historic environment, and meet local employment and</i>	C

			<p>instance the Green Man in Bellingham, however, the provision is patchy in type and quality and has not kept up with the demands of the substantial population growth, particularly in the borough's Opportunity Areas which also look to the framework area to meet these needs. There are also major sites under construction which when complete will place additional demand on social infrastructure which is not being increased in parallel.</p> <p>A comprehensive social infrastructure audit as set out in London Plan <i>Policy S1 Developing London's Social Infrastructure</i> will be important in the Council and partners understanding the scale and type of infrastructure required and help ensure adequate provision within the development sites along the A21.</p> <p>The work the South East London Clinical Commissioning Group, the NHS London Healthy Urban Development Unit and NHS providers are doing to identify the health infrastructure required to meet the needs from the forecast growth, as well as the current pandemic, the expansion of roles within the Primary Care Network and new ways of working will be an</p>	<p>in the Authority Monitoring Report.</p> <p>A recommendation to carry out Healthy Place Assessments has not been included in the A21 Development Framework as this is not a recommendation specifically relevant to the A21 Development Framework study area.</p>	<p><i>social infrastructure needs</i></p> <p>The text within the principle has been changed as follows:</p> <p><i>The distinctiveness and heritage of each centre and character area should be celebrated and enhanced. Each centre along the A21 is unique, and these differences should be amplified through use and character, as well as provision of a rich experience. The A21 contains lots of social infrastructure. It's vital that the A21 this provides services social</i></p>	
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			<p>important part of this. The continued close working between the Council, the NHS and the voluntary and community sector to maximise integration and co-location where possible is also vital.</p> <p>A summary of the proposed development sites within the draft Framework together with an updated Housing Trajectory would be helpful to understand the likely overall demand and plan for its provision.</p> <p>We welcome the emphasis on Healthy Streets, however this should be expanded to Healthy Places. The use of Health Impact Assessments at the outset of considering development to maximise the contribution positively to mental and physical health is encouraged as a prerequisite for development.</p>		<p><i>infrastructure for local people.</i></p> <p>In the Introduction and Vision: Spatial Opportunities Development Potential section of the document the following paragraph has been added:</p> <p><i>The A21 Development Framework does not include an assessment of future social infrastructure needs. This information is provided in the Infrastructure Delivery Plan that is informed by the Local Plan. The Council works with key infrastructure providers to prepare the Infrastructure Delivery Plan.</i></p>	
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76	Quaggy Waterway's Action Group (QWAG)	1 introduction and vision	Guiding principle 5	<p>Guiding Principle 5, page 11</p> <p>The Framework's Guiding Principle 5 on page 11 is to "Increase tree planting and make the River Ravensbourne and other natural assets more accessible", which suggests a prime focus on visual impact and access over improving the river and its condition including through de-culverting.</p> <p>That would underplay the important role (and need) for the river to be restored such that it can play its full role in supporting wildlife, helping to reduce flood risk, improving water quality, and aiding formal and informal learning.</p> <p>The baseline study was posed to us as being about both the A21 and the River Ravensbourne as twin features of the corridor, but as currently presented, the Development Framework has downgraded the river to being a feature to walk or cycle alongside and to make new development look good, regardless of its condition.</p> <p>That would be short-sighted and unacceptable. If these matters are to</p>	<p>Agree with need to emphasise improving the condition of the river.</p> <p>More specific design proposals for improving the condition of the river will be developed as and when funding becomes available.</p>	<p>Guiding Principle 5 has been altered to the following</p> <p><i>"Increase tree planting and improve the condition of and access to make the River Ravensbourne and other natural assets",</i></p> <p>The Guiding Principle 5 text has been changed to the following: <i>The Ravensbourne is close but not always accessible. A key goal is to integrate the A21 into the wider blue/green network. East west connections should be improved. Development proposals should look to re-</i></p>	C
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				be properly addressed through other strategies that should be made clear in the Development Framework.		<i>naturalise the river wherever possible and provide access to and along the Ravensbourne. This will mean setting new building frontages back from the river and redefining backs of buildings as frontages. The condition and biodiversity value of the river should also be enhanced.</i>	
77	Woodland Trust	1 Introduction and vision	Guiding principles	<p>We strongly support Guiding Principle #5 to increase tree planting and make local natural assets more accessible.</p> <p>Increasing tree canopy cover is an important part of fighting climate change and nature loss.</p> <p>Increasing access to the natural environment, brings multiple health and social benefits. The Woodland Trust believes that having leafy streets and access to woodland walks should not only be for the affluent.</p> <p>We welcome the identification of</p>			S

				spatial opportunities to improve green and blue infrastructure, contributing to the delivery of biodiversity net gain and providing an opportunity to address inequalities in access to natural greenspace.			
78	Landsec Lewisham Limited	1 Introduction and Vision	Lewisham Shopping Centre	<p>The Study Area</p> <p>Page 4 of the Draft Framework identifies the 'Study Area boundary', which includes Lewisham Shopping Centre. Paragraph 3.3 on page 36 of the Draft Framework states:</p> <p>"Lewisham town centre is covered by an existing, adopted Local Plan and Catford town centre is covered by Catford Town Centre Framework. Thus, this document does not provide any further guidance for those areas. Lewisham Hospital is also excluded from the scope of this study."</p> <p>Paragraph 3.5 on page 37 of the Draft Framework goes onto state:</p> <p>"Molesworth Road to be anchored with a high-rise point tower and a mid-rise cluster. This study does not include Lewisham Shopping Centre development potential as guidance for this area is provided in the Lewisham Town Centre Local Plan."</p> <p>Given that there are separate existing and emerging planning policy documents for sites within Lewisham</p>	Noted	-	S + NC

				Town Centre (including for Lewisham Shopping Centre which is subject to Site Allocation 2 of the Regulation 18 Local Plan), we agree that the Draft Framework should not apply to Lewisham Shopping Centre or provide any further guidance for Lewisham Town Centre.			
79	Landsec Lewisham Limited	1 Introduction and Vision	Lewisham Shopping Centre	<p>We also consider that paragraphs 3.3 and 3.5 of the Draft Framework should acknowledge LB Lewisham’s emerging Local Plan as this contains a number of proposed policies and Site Allocations for Lewisham Town Centre.</p> <p>We therefore suggest revised wording for each paragraph as follows (new text in red): “3.3 Lewisham town centre is covered by an existing, adopted Local Plan and Catford town centre is covered by Catford Town Centre Framework. A new Local Plan for Lewisham is also being produced which contains policies and site allocations for Lewisham and Catford town centres. Thus, this document does not provide any further guidance for those areas. Lewisham Hospital is also excluded from the scope of this study.”</p>	Noted and proposed changes accepted. However, it should be noted that the Molesworth Street Car Park has been removed as a potential development site as it lies within a Flood Zone 3B site.	3.3 now reads as follows (the text in italics is new additional text): Lewisham town centre is covered by an existing, adopted Local Plan and Catford town centre is covered by Catford Town Centre Framework. <i>A new Local Plan for Lewisham is also being produced which contains policies and site allocations for Lewisham and Catford town centres.</i> Thus, this document does	C

				<p>“3.5 Molesworth Road to be anchored with a high-rise point tower and a mid-rise cluster. This study does not include Lewisham Shopping Centre development potential as guidance for this area is provided in the Lewisham Town Centre Local Plan as well as in an emerging Site Allocation in the Council’s Draft Local Plan .”</p>		<p>not provide any further guidance for those areas. Lewisham Hospital is also excluded from the scope of this study.”</p> <p>3.5 has been changed as follows (with italics showing new text), “This study does not include Lewisham Shopping Centre development potential as guidance for this area is provided in the Lewisham Town Centre Local Plan <i>as well as in an emerging Site Allocation in the Council’s Draft Local Plan.</i>”</p>	
80	LBL Planning Officer	1 Introduction and Vision	Page 15 Summary of Findings from A21 Developme	A key finding from the A21 Development Framework Baseline Study is that the River Ravensbourne is an underused natural asset.	Noted.	<p>The following bullet point has been added:</p> <p><i>The River Ravensbourne is an important asset</i></p>	C

			nt Framework Baseline Study			<i>that runs close by to the A21 to the west and there is the potential to improve public access to it and its biodiversity value.</i>	
81	London Borough of Lewisham	1 introduction and vision	Pg. 15	could potentially mention here the mandatory requirement for Biodiversity Net Gain from 2023 once the Environment Bill comes in	There is already a requirement for schemes to bring about a biodiversity net gain in the London Plan (2021). Whilst this recently introduced policy requirement is acknowledged, we are not mentioning policy in this section to keep it as a succinct introduction.		NC
82	Environment Agency	1 Introduction and Vision	River Ravensbourne	Thank you for consulting the Environment Agency. We welcome the draft A21 Development Framework and support the focus on improving the urban environment, maximising opportunities for river restoration, managing flood risk, urban greening and adapting the A21 area to climate change.	Noted	No change	NC

There are major opportunities to deliver ongoing environmental improvements and deliver river restoration schemes and high quality developments with high standards of sustainable design and construction across the A21 Development Framework area. We welcome the focus on improving environmental quality and improving links to the Waterlink Way and improving the water environment and sustainable design and construction.

“Guiding Principle #5 Increase tree planting and make the River Ravensbourne and other natural assets more accessible”

We support ongoing partnership working to improve the Ravensbourne catchment and believe spatial planning has an essential role to play in improving the water environment and managing flood risk.

We are keen to continue to work in partnership with you and developers to improve the water environment through new riverside buffer zones between development and rivers to ‘make space’ for water and river restoration to deliver multiple environmental, social and economic benefits.

	N/A	1 Intro duction and Vision	River Ravensbou rne	Supported especially the development of access to the Ravensbourne.	Noted.		S NC
83	LBL Planning Officer	1 introdu ction and vision	Spatial Opportunit ies	The Lewisham, Catford and New Cross Opportunity Area boundary should be shown on the map with the 'Summary of Findings from the Baseline Study' as this is a key characteristic distinguishing the northern area from the southern area.	Noted	Opportunity Area has been included.	C
84	Quaggy Waterway s Action Group (QWAG)	1 introdu ction and vision	Spatial opportunit ies	Para 1.15, page 13 This section states that: "The Lewisham's rivers and green network around the A21 Development Framework Study Area is not completely accessible to the public and restricted by transport infrastructure. Its natural assets should become a more fundamental part of the A21's character." The section appears to confirm the focus on access to the river rather than the quality of the river which is, in turn, made more accessible. Also, given that the river corridor's 'natural assets' are not being realised because large sections of the river remain encased in dead concrete, the failure of the Framework to address this confirms the focus on superficial visual amenity over ecological		The following sentence has been added to the end of paragraph 1.15 to address this comment: <i>The condition and biodiversity value of the River Ravensbourne should be increased and proposals should be developed with regard to the adopted River Improvement Corridor SPD.</i>	C

				improvements, contrary to what QWAG was led to believe in the baseline study			
85	Quaggy Waterways Action Group (QWAG)	1 introduction and vision	Spatial opportunities	<p>Para 1.28, page 15</p> <p>As per our comments on page 13 above, page 15 summarises the A21 baseline study and its recommendation for the “opening up parts of the river and its banks where they are currently invisible or inaccessible to the public” (para 1.28), but increased access does not necessarily amount to improving the state of the river and its corridor.</p>		<p>Paragraph 1.28 has been changed as follows:</p> <p><i>The River Ravensbourne has four dominant conditions: (1) ponds and soft edges, (2) culverted, (3) canalised, and (4) ponds that were associated with former mills. There is the opportunity to improve the condition and the biodiversity of the River Ravensbourne would could include naturalising the river bed and banks in line with the adopted River Improvement Corridor SPD.</i></p>	C

86	Quaggy Waterways Action Group (QWAG)	1 introduction and vision	Spatial opportunities	<p>Para 1.29, page 15</p> <p>This odd section states that “Likewise the amenity and biodiversity value of green assets like Lewisham Park should be improved with better signposting increasing their accessibility”, yet better signage in and of itself does not lead to improved conditions for biodiversity. As the Framework does not contain genuine improvements to the ‘biodiversity value’ of the river and road corridor, it is hard to understand what people would be being signposted to in biodiversity terms. Improved routes and access are aided by waymarkers, but that is not the same as boosting biodiversity. If the Framework has thorough plans to improve biodiversity that should come through, but it does not.</p>	<p>Support suggested change in terms of providing more clarity.</p> <p>Because this is a strategic document site specific designs for biodiversity enhancement are not included in the document. When detailed designs for proposals are developed further, specific proposals these would be developed.</p>	<p>The following sentence in paragraph 1.29 has been changed as follows:</p> <p><i>Likewise the amenity and biodiversity value of green assets like Lewisham Park should be improved with and better signposting provided to increasing improve their accessibility.</i></p>	C
87	LBL Planning Officer	1 Introduction and Vision	Spatial opportunities: Green and blue infrastructure	Would be appropriate to have a precedent image of renaturalisation of a river in a local urban context.	Noted.	<p>A photo of Cornmill Gardens has been inserted on to page 16 with the following caption:</p> <p><i>The River Ravensbourne at Cornmill Gardens in Lewisham Town</i></p>	

						<i>Centre. The river was renaturalised in 2007.</i>	
88	LBL Planning Officer	1 Introduction and Vision: Spatial Opportunities for the A21	Strategic context	<p>The following key aspects of the context to the study area are missing from 2 maps</p> <p>-Study Area p4 -the Spatial Opportunities for the A21 p41</p> <p>1.A more defined River Ravensbourne 2.Railway line to the west of the study. 3. The outline of the Lewisham, Catford and New Cross Opportunity Area 4. South Circular/A205</p>	Noted.	<p>The following key aspects of the context to the study area are now shown on the map on the Spatial Opportunities for the A21 page.</p> <p>1.A more defined River Ravensbourne 2.Railway line to the west of the study. 3. The outline of the Lewisham, Catford and New Cross Opportunity Area</p>	C
89	London Borough of Lewisham	1 introduction and vision	Typo Pg. 15	'net gain FOR biodiversity not 'of'		This correction has been made.	C
90	LBL Planning Officer Comment	2 Overarching		The Introduction to the Overarching Guidance section should come before the section on Building Heights to avoid confusion.	Noted.	The introduction to the Overarching Guidance section is now on a	C

		Guidance				separate page in the document to the Building Heights section.	
91	LBL Planning Officer Comment	2 Overarching Guidance		The document should make it clear that the design themes that overarching guidance is provided on is a non-exhaustive list of design matters that schemes need to address.	Noted.	The following additional text has been added to paragraph 2.2: <i>Guidance is provided on the key themes of building heights, activating frontages, architectural character, public realm and air quality. Additional design matters should be addressed when designs are progressed in accordance with Local, London Plan and National Planning Policy.</i>	C
92	N/A	2 Overarching		The heights in metres provided in the Building Heights guidance should be described as approximations as they have not to be accurately measured.	Noted.	The prevailing and proposed building height for each of the character	

		guidance				areas are provided as approximations. For example: 2. Ladywell Prevailing building heights: approx. 6-12m (2-4 storeys) Proposed buildings heights: approx. 9-24 (3-8 storeys)	
93	N/A	2 Overarching guidance		The visual appearance of retail frontages from an aesthetic point of view needs greater emphasis.	Agree with the comment.	The following paragraph has been inserted in to the text: <i>2.38 Shopfront improvement grants could be a way of improving the visual appearance of the street at the ground floor.</i>	C
94	N/A	2 Overarching guidance		Nice to see that air quality and cycling infrastructure are there in the guidance. Very important that these are planned in to include safe separated cycle paths and enough places to lock up a bike.	-		S NC

95	N/A	2 Overarching guidance		Promoting green spaces, more walking and more cycling is positive and I support it			S NC
96	Avison Young/ Barratt London and The Church Commissioners	2 Overarching Guidance	A distinctive public realm	<i>Overarching Guidance - A distinctive public realm: Area-based strategy</i> Page 22 of the Framework outlines 'key projects' relating to the distinctive public realm for each Character Area. For Area 3 (Rushey Green and Catford), the Draft A21 Framework correctly accords with the provisions of the CTCF. The CTCF's aspiration for Catford to 'become the greenest town centre in London' is also referred to. We therefore broadly support this section of the Draft A21 Framework.		-	S NC
97	Lewisham and Greenwich NHS Trust/ Avison Young	2 Overarching guidance	A distinctive public realm	Page 22 of the Framework outlines 'key projects' relating to the distinctive public realm for each area. These projects have been identified as having a high priority to improve the local environment of the A21. LGT is generally supportive in principle of these projects, provided that delivery does not comprise continued and future operation of the wider UHL site and its hospital-related use. Furthermore, it is expected that any contributions to these projects (which	Noted.	A sentence has been added at the end of paragraph 2.19 stating the following: <i>The delivery of public realm projects should not comprise the continued and future operation of the wider University Hospital</i>	S

				may covered by Community Infrastructure Levy of sought through planning obligations on developments coming forward in the area) would need to meet the required tests set out within Paragraphs 56-57 of the NPPF (2021)		<i>Lewisham site and its hospital-related use.</i>	
98	London Borough of Lewisham	2 Overarching Guidance	A distinctive public realm Street panting	Most of the example photos show a lot of hard standing with planters or a few trees here and there and none of the example photos or drawings show green walls on buildings. We should encourage soft landscaping as much as possible in these developments and the examples that are included in the document should inspire and encourage this and the use of green infrastructure. There are many images online about exemplary buildings with living walls or green streetscapes. One example: https://livingroofs.org/green-walls/	More relevant precedent images have been provided.	The following images have now been included as precedent images: A low-maintenance living wall Planting within a new development with diverse biodiversity	C
99	London Borough of Lewisham	2 Overarching Guidance	A distinctive public realm Planting	Consider including and encouraging the Stockholm method for tree planting here. This method is a way of planting street trees 'cost effectively provide renewable energy, scale-up sustainable drainage solutions, sequester carbon, reduce waste and facilitate community participation while achieving healthy and lasting growth for urban trees in hard landscapes.'	As this is a strategic document covering a large area it is not possible to go in to more detail regarding the method for tree planting.	-	NC

				(https://www.tdag.org.uk/june-2015-scotland.html)			
100	London Borough of Lewisham	2 Overarching guidance	Air quality	Air quality guidance recommends non-flat roofs but it doesn't seem to have considered if there is a living roof on the building? It might change the conclusion if the benefits of the green roofs are considered? (I am not an air quality expert so it is a genuine question for the roof shape-air quality discussion). And if green roofs are not enough to counter balance the air quality issues relating to flat roofs I think we should encourage trapezoid roofs because those could also accommodate green roofs while it is less likely to have a green roof on a slanted roof	Comment acknowledged.	The following sentence has been added to 2.60: <i>Trapezoidal roof shapes may be preferable to slanted roofs as they are more likely than slanted roofs to be able to accommodate living roofs.</i>	NC
101	N/A	2 Overarching guidance	Air Quality	The air quality guidance is poor - improving air quality should be done by doing exactly that and tackling the cause, not trying to mitigate it. There should be a focus on healthy streets and pedestrianised areas.	The Council has a detailed Air Quality Action Plan that aims to tackle the root cause of air pollution. Please see details on the Council website		NC
102	N/A	2 Overarching guidance	Air quality	Again living walls are not even mentioned although they could be a very important part of the solution to improve air quality		The first bullet point of paragraph 2.49 has been amended as follows: <i>Green infrastructure –</i>	C

						<i>tree planting, living walls and other soft landscaping.</i>	
103	Quaggy Waterways Action Group (QWAG)	2 Overarching guidance	Biodiversity	<p>a) Biodiversity and ecosystem assessment.</p> <p>Properly chosen, placed, and sympathetically maintained planting, hedging and trees can play a multifunctional role for air quality. They also have a wider role for water retention and flood risk reduction, in carbon storage, in helping to moderate urban temperatures, and as part of strategies to boost learning and skills in maintenance of the urban realm.</p> <p>As stated in b) above, the Framework does not appear to be based on a credible biodiversity assessment and / or ecosystems assessment. As a result, opportunities from taking that approach seem to be being missed with a preference for reliance on more of the same random amenity planting of low or no ecological value. A biodiversity and ecosystem services basis would tie in with the economic value and focus. If the Development Framework has been informed by such studies that should be set out and should be made clear throughout.</p>	Noted.	See response to above comment.	C

104	London Borough of Lewisham	2 Overarching guidance	Bio-diversity	As mentioned above I am glad to see the river and greening featuring in the document but there is not a lot of information or guidance on achieving net gain for biodiversity besides some information about planting, trees and the access to river. For example verges are only mentioned on p165 whereas this should be an integral part of greening along the A21 route and TfL has a project that aims at improving road verges (happy to link to contact re this). Also integrated bird and bat boxes, insect hotels, living roofs and other similar biodiversity enhancements should be mentioned to make sure that habitats are provided for biodiversity in future developments along the A21.	Noted.	Paragraph 2.31 has been changed as follows: <i>The range of plant and tree species should be limited to species that are native to the UK and contributing to local biodiversity. Habitat for fauna should be provided including, bird and bat boxes, insect hotels and living roofs to help create a green corridor for wildlife.</i>	C
105	Environment Agency	2 Overarching guidance	Buffer zones and improving river corridors	Buffer zones and improving river corridors In line with the River Corridor Improvement Plan (RCIP), all riverside developments should maximise opportunities to improve the riverside environment. Developments should consider deculverting and naturalising of sections of main river. Naturalising a main river can offer flood risk	Noted.	The following text has been added to 2.37: <i>Where possible animate Ravensbourne riverside though active uses and improved public</i>	C

			<p>benefits by slowing down the peaks of high flow events and allowing time for increased storage within the floodplain. New development should maximise opportunities to include a minimum 8 metre buffer zone from the top of river bank or river wall.</p> <p>For both deculverting and naturalising, a site-specific Flood Risk Assessment (FRA) should include a consideration for the change in flood risk to the neighbouring area as a result of proposed changes to the main river. For some sections of main river, deculverting may not be appropriate as the changes to the main river may negatively impact flows in up/downstream sections of culvert. We would not support proposals which propose a net increase in culverting.</p> <p>Residential developments should be considered as an opportunity to provide environmental and flood risk benefits across the development's 100 year design life. We would likely object to any large residential development, with riparian duties to a significant length of main river, that did not provide works to better the main river. As a minimum, this should</p>		<p><i>spaces. New development should maximise opportunities to include a minimum 8 metre buffer zone from the top of river bank or river wall.</i></p> <p>The following paragraph has been added:</p> <p><i>2.38 Residential developments should be considered as an opportunity to provide environmental and flood risk benefits across the development's 100 year design life. New schemes should include an assessment of the condition of the culvert/channel and large schemes</i></p>	
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				be an assessment of the condition of the culvert/channel, but we would likely require a scheme of works to deculvert and/or naturalise the channel.		<i>should seek to deculvert and/or naturalise the channel.</i> <i>Further guidance is provided in the River Corridor improvement Plan Supplementary Planning Document (2015).</i>	
106	LBL Planning Officer Comment	2 Overarching Guidance	Building Heights	The Overarching Guidance only applies to plots directly facing the A21 and therefore paragraph 2.6 should be removed.	Noted.	Paragraph 2.6 has been removed.	
107	LBL Planning Officer Comment	2 Overarching Guidance	Building Heights	The building heights proposed have not been tested visually and therefore it should be stated that the building heights are “suggested” rather than “proposed”. It should be emphasised further that agreed heights would be subject to extensive visual testing and assessment of the impacts on townscape and adjoining occupiers.	Noted	All the building heights are now described as “suggested” rather than “proposed”. Paragraph 2.9 has been amended as follows:	

						<p><i>Heights for specific sites will be subject to further extensive testing through the pre-application process to include assessment of impacts on townscape and adjoining occupiers. Visual testing of proposed heights for schemes may demonstrate may determine that lower or taller development than the indicative suggested thresholds provided in the A21 Development Framework is are appropriate.</i></p>	
108	Lewisham and Greenwich NHS Trust/	2 Overarching guidance	Building heights	We note that the Framework provides 'Overarching Guidance' for the A21 corridor, including building heights for the specific character areas. For Area 2 Ladywell (which includes the northern part of the UHL site) the	-		S NC

	Avison Young			prevailing building heights are noted as 6-12m (2-4 storeys), and proposed buildings heights put forward as 9-24m (3-8 storeys). For Area 3 Lewisham Hospital, Park and Greens (which includes the wider UHL site) the prevailing building heights is noted as 9-21m (2-7 storeys), and proposed buildings heights put forward as 9-30m (3-10 storeys). LGT widely supports the identification of these indicative proposed buildings heights for both Area 2 and Area 3.			
109	London and Quadrant Housing Trust	2 Overarching guidance	Building heights	<p>L&Q support in principle the key themes of building heights, architectural character, public realm and air quality however we understand well the challenges of balancing competing design factors when bringing forward new housing developments.</p> <p>We understand the need to ensure taller buildings are located within appropriate locations, but we believe that land must be used to its full potential in order to deliver much needed homes across all tenures. We understand the need to identify areas for tall buildings in the most</p>	Noted.	-	NC

				<p>sustainable locations but consider that the Council should support proposals for tall buildings outside of these locations, where they respond positively to the existing townscape.</p> <p>We support the council's aspirations to improve the public realm with activated frontages, street furniture, planting and overall providing positive ground floor experience for pedestrians. The Council should be mindful however of the competing demands for ground floor space, given the latest Fire and Energy regulations and especially where they are seeking compliance with TfL's London Cycle Design Standards.</p> <p>In principle, L&Q supports the need to enhance the architectural character of areas in the corridor however we believe that heritage is one of several factors that need to be taken into consideration in the determination of planning applications for new development.</p>			
110	N/A	2 Overarching guidance	Building heights	Building heights should NOT be extended above the already existing heights. The proposed heights are too high and will destroy the look of the area as well as have affects on air flow	The heights proposed would require further testing to demonstrate that they would meet Local, London Plan and		NC

				<p>(which is already very bad around Lewisham with the new towers), creating strong wind channels. The communities across Lewisham have consistently said they don't want high storey tower blocks. Not only do local residents not want them for aesthetic reasons, but also for blocking light, the change to landscape, the very often poor quality but also expensive apartment blocks. After Grenfell tragedy (including ongoing saga with cladding and insurance issues) and the covid pandemic, people do not want to live in tower blocks. This is bad planning and will end up with those who cant afford to buy, renting expensive and poorly managed apartments or them being bought and used as investments when what we need is decent affordable housing (with outdoor spaces!) liveable for families.</p>	<p>National Planning Policy. This includes guidance regarding microclimate.</p>		
111	N/A	2 Overarching guidance	Building heights	<p>We note that the current Draft does not identify that that there are instances of taller buildings locally (such as the 3no. 15-storey tower blocks on the eastern side of Lewisham High Street). We would recommend that the text within the</p>	<p>A photograph of the Lewisham Towers is provided in section 2.3.</p> <p>Heights of specific buildings are not provided in this</p>	-	NC

				Draft Framework is updated to reflect this aspect of the surrounding context.	document as they are provided in the A21 Development Framework Baseline Study.		
112	N/A	2 Overarching guidance	Building heights	LGT also support in strong terms the commentary within Paragraph 2.9 (Page 20) which states that “heights for specific sites will be subject to further testing through the pre-application process which may determine that lower or taller development than the indicative thresholds is appropriate”. This approach is encouraged as it will allow Officers at the Council to have regard to the outcomes of a design-led approach to determine site capacity, as is required by Policy D3 of the London Plan (2021). We also request that the Framework be updated to reflect that (where justified through detailed design, townscape/heritage and environmental analysis) there may be scope for building heights to exceed the indicative thresholds identified within the document.	Paragraph 2.9 has been amended to reflect this comment.	Paragraph 2.9 has been changed to state the following: <i>“heights for specific sites will be subject to further testing through the pre-application process which is likely to include assessing townscape, heritage and environmental impacts. This testing may determine that lower or taller development than the indicative thresholds is appropriate”.</i>	C
113	LBL Planning Officer	2 Overarching	Building Heights. Page 22	The Catford building heights proposed should be a maximum of 13 storeys not 20.	The Catford building heights proposed is a maximum of 13 as in	- The Catford building heights now shown to be a	NC

		Guidance			the consultation draft storeys not 20. (20 storeys is proposed for a site away from the street frontage in the CTCF).	maximum of 13 as in the consultation draft	
114	LBL Planning Officer	2 Overarching Guidance	Building Heights. Page 22	To avoid confusion recommend that it is emphasised that guidance for building heights is only provided for plots in the A21 Development Framework study area that directly front the A21.	Noted.	The following text on page 22 has been bolded: <i>Guidance is only provided for plots in the A21 Development Framework study area that directly front the A21.</i>	C
115	Avison Young/ Barratt London and The Church Commissioners	2 Overarching Guidance	Buildings heights	<i>Overarching Guidance – Building heights</i> We note that the Framework provides ‘Overarching Guidance’ for the A21 corridor, including building heights for the specific character areas. For Area 3, the document identifies that proposed building heights between 27-39m (9-13 storeys) would be acceptable, however, also acknowledges that further guidance on appropriate heights is included within the CTCF document.	The building height guidance has not been altered in response to this comment because heights guidance is only provided for sites that directly front the A21 and the height guidance is consistent with that provided in the Catford Town Centre Framework. This section of the document directs the reader to the Catford	The following paragraph has been added. <i>2.10 Further guidance on building heights for specific sites within the Catford Town Centre Framework Area is provided within the Catford Town Centre Framework (2021),</i>	C

				<p>We welcome the reference to the CTCF within this part of the Draft A21 Framework. However, to ensure full consistency between the documents, we recommend that this section of the A21 Framework be updated to specifically identify that <i>“where development sites are already included within the Catford Town Centre Framework (2021), the principle of significantly taller buildings (i.e. of up to 20 storeys) will be acceptable in accordance with the CTCF (and subject to other relevant planning consideration being addressed)”</i>.</p>	<p>Town Centre Framework for further detail.</p>	<p><i>The boundary of the Catford Town Centre Framework has been provided on the building heights map.</i></p>	
116	N/A	2 Overarching Guidance	Car use	<p>Driving should be discouraged and this means more active methods to do this such as removing parking and making driving less convenient.</p>	<p>The A21 Development Framework proposes the redevelopment of surface car parks and car dominant retail parks.</p> <p>Further proposals for reducing car-parking can be developed when detailed designs for the road are advanced further.</p>		NC
117	N/A	2 Overarching	Cycle lanes	<p>Adding segregated cycles lanes and having nicer looking pavements will not automatically mean more people will use these transport methods,</p>	<p>Evidence shows that the provision of segregated cycle lanes does increase cycling</p>		NC

		Guidance		especially if they're still alongside heavily polluting main roads with cars and lorries having priority.	because they increase safety for cyclists by separating them from other vehicles.		
118	London Borough of Lewisham	2 Overarching Guidance	Cycling and walking connection	Linking to my comment above, it is not just cycling and walking connections that should be considered but connectivity for wildlife as well at a landscape scale (i.e. the whole length of the A21). The river and railway lines in Lewisham (and elsewhere) are key corridors for wildlife and the A21 should aspire to become a similar corridor. Greening the route as much as possible and providing new habitats could provide a new route for wildlife to use.	Verges along the A21 are described earlier in the document see - 'A distinctive public realm: Area-based strategy'. However, this has been made clearer as they are referred to as the London Squares in the document. Paragraph 2.31 has been amended to emphasise the aspiration to create a green corridor for wildlife.	Paragraph 2.31 has been amended to emphasise the aspiration to create a green corridor for wildlife. <i>"Creating new pocket parks to extend the existing corridor of designated London Squares (linear pocket parks/wide verges"</i>	C
119	Quaggy Waterways Action Group (QWAG)	2 Overarching design	Distinctive public realm River Ravensbourne	Page 24 This page deals with planting of the A21 (river) corridor although it remains unclear how the plans will be informed by credible ecological assessment. The framework seems to be adopting a superficial amenity planting approach which is far too common in new development and regeneration projects in the borough (and		Paragraph 2.29 has been amended as follows: 2.29 <i>The planting strategy focuses on increasing tree, shrubbery and low cover planting coverage along the</i>	C

			<p>elsewhere), and which does not require baselines for biodiversity and ecosystem service function because planting is carried out mainly for design and visual amenity purposes, and which can be maintained with little skill and no regard to biodiversity.</p> <p>This section seems to overlook the scope to inform design using credible ecosystem mapping.</p> <p>Photographs on this page reinforce the sense of a visual amenity approach instead of an ecologically driven design. For example, it would be surprising if the trees shown in image 5 (Aldgate Square) have not been arranged in the manner portrayed (a circle) because of an ecological assessment.</p> <p>Planting of mixed native hedgerows along river corridors would enhance them as wildlife corridors and help to link parks and spaces (e.g., behind Selco, light industry estate).</p> <p>The maintenance costs for this (i.e., by skilled operators who have been trained to understand the planting and the biodiversity) could be factored in through precept from s106/CIL.</p>		<p><i>length of A21. The aim of this strategy is to plan for the long-term future provision of mature and majestic trees along the street which will enhance its boulevard character and also increase the biodiversity value of planting.</i></p> <p>The following paragraph has been added: <i>2.33 Planting of mixed native hedgerows along the river corridor is recommended to enhance wildlife.</i></p>	
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120	Quaggy Waterways Action Group (QWAG)	2 Overarching design	Distinctive public realm River Ravensbourne	Para 2.37, page 25 This section on the public realm states that “Where possible animate Ravensbourne riverside through active uses and improved public spaces.” No reference is made to improving the state of the river and the approach seems to be solely about opening up access to the river even if its condition is ignored.	This comment is noted, however, the topic of this section of the document is access and therefore there changes have not been made here.		NC
121	Woodland Trust	2 Overarching guidance	Distinctive public realm	<p>We strongly support the Overarching Guidance on "A distinctive public realm: Recurrent planting strategy".</p> <p>In particular, we welcome the commitment in 2.29 to focus on tree planting for long term future provision (we assume 'lover' is a typographical error for 'cover').</p> <p>We believe this policy could be further strengthened by adding a specific canopy cover % target; and by specifying a greater than 1:1 replacement requirement should trees in the framework area be lost.</p> <p>We strongly welcome the priority given to native species in 2.31, and recommend adding a preference for tree stock that meets UK & Ireland Sourced & Grown (UKISG) standards.</p>	<p>Noted.</p> <p>Noted. See change.</p> <p>As this is a strategic document it is not possible to be more specific about sourcing and growing standards. Urban hedgerows are now mentioned. Chicanes and build</p>	<p>The following sentence has been added to 2.30</p> <p><i>It should be aimed to increase tree canopy provision by 10% in line with Policy G7 of the London Plan.</i></p>	C + NC

				<p>We would suggest expanding the suggestions in 2.33, for example to include urban hedgerows, trees in chicanes or buildouts, and green walls.</p> <p>In addition we welcome 2.49 recognising the role of GI in improving air quality (also 2.66 onwards) and 2.53 on the role of trees in improving the roadside environment.</p>	<p>outs are unlikely to be common on the A21 given it is a red route.</p> <p>A precedent image of a green wall is provided in the Overarching Guidance</p> <p>A distinctive public realm: Recurrent planting strategy</p>	<p>2.33 has been altered as follows:</p> <p>There are a number of innovative means of increasing plant coverage that could be used to serve more than one purpose, for example using planters in place of bollards and urban hedgerows</p>	
122	Environment Agency	2 Overarching Guidance	Environmental evidence and data	<p>Environmental evidence and data</p> <p>All planning policies, proposed site allocations and planning decisions need to be informed by the latest environmental data and evidence and state of the local environment to ensure new development delivers environmental improvement.</p> <ul style="list-style-type: none"> Datasets such as groundwater source protection zones, flood risk zones, main river maps: http://environment.data.gov.u 	<p>This guidance is acknowledged is not provided in the A21 Development Framework as it is provided in other planning guidance documents.</p>		NC

				<p>k/ds/partners/index.jsp#/partners/login</p> <ul style="list-style-type: none"> Catchment planning data: https://environment.data.gov.uk/catchment-planning/ <p>We hope our response is helpful, and if you have any questions or require more information please let me know.</p>			
123	Environment Agency	2 Overarching guidance	Flood risk management and climate change	<p>Spatial planning has a key role in directing new development towards the lowest flood risk zones. We request the point <i>“The residential development will be subject of approval of the design from the Environmental Agency given the site is in a Flood Zone 3B.”</i> is removed from page 74 (Site 1: Molesworth Street). If a site is mapped as functional floodplain FZ3b it is not suitable for residential land use, regardless of the design, and would be contrary to planning policy and guidance. FZ3b is essential for storage of floodwater and is protected by national, regional and local plan policies. FZ3b should be identified and protected from inappropriate development.</p> <p>Given the high levels of flood risk and potential impacts of climate change across Lewisham we recommend the Strategic Flood Risk Assessment (SFRA) is regularly reviewed and</p>	Comment is noted.	The Molesworth Street Site has been removed from the document as a potential development site.	C

				<p>updated in line with the latest climate change allowances and flood risk management planning policies and guidance.</p> <p>Where regeneration is planned in medium and high risk flood zones this should be informed by a detailed assessment of flood risk and climate change through a site-specific Flood Risk Assessment, including evidence of Sequential and Exception Test, where required. The FRA should assess if the proposed development, layout and design etc is suitable for the flood zone and will not increase flood risk on or off site and is informed by the latest flood risk and climate change evidence.</p> <p>We recommend early pre-application engagement to ensure the key environmental issues and opportunities such as flood risk management and river restoration are addressed as early as possible in the planning process. Please contact kslplanning@environment-agency.gov.uk for planning advice and guidance.</p>			
124	TfL	2 Overarching	Good practice examples	A number of the good practice examples may not be appropriate for			

		<p>Guidance</p>		<p>the A21. Some sections are particularly misleading.</p> <p>For example “Good practice examples to improve traffic flow” on page 29 appears to have been lifted straight from another document. Improving traffic flow is not currently one of the Mayoral objectives and some of the suggested measures may actually hinder the achievement of other objectives. For example roundabouts can be particularly difficult for cyclists and pedestrians to navigate while cafes, public art and planting trees may animate spaces but they may obstruct movement of pedestrians and cyclists where space is restricted.</p> <p>If street furniture and planting strategies are proposed careful thought needs to be given to future maintenance and compliance with TfL requirements and guidance. There may be constraints on where tree planting can safely be implemented.</p>	<p>The <i>Overarching Guidance</i></p> <p><i>Overarching Guidance</i></p> <p><i>Air Quality: Improve the traffic flow</i></p> <p>of the document has been removed.</p> <p>Where tree planting and street furniture are referred to can stress that tree planting needs to be safely implemented to not obstruct the movement of pedestrians and cyclists.</p> <p>Noted.</p>	<p>The following section has been removed:</p> <p><i>Overarching Guidance</i></p> <p><i>Air Quality: Improve the traffic flow</i></p> <p>The following paragraph has been added to the “Overarching Guidance</p> <p>A distinctive public realm:</p>	
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						<p>Area-based strategy” (2nd paragraph on the page.)</p> <p><i>The development of all public realm projects should consider the ongoing maintenance costs as well as compliance with TfL requirements and guidance.</i></p>	
125	N/A	2 Overarching Guidance	Green spaces	The improvements and increase in green spaces is very welcome as is the additional and improvements to cycling and pedestrian access. More greening and less concrete! More 'wild' spaces such as wild verges and grass, plants and trees.			S
126	LBL Planning Officer	2 Overarching Guidance	Guiding Principles	Guiding principle 1 needs to be altered to show that it aligns with Planning Policy and the need to meet the Borough’s identified housing need.	Noted and requested change has been made.	<p>Guiding Principle #1 now reads as follows:</p> <p>Maximise the delivery of new homes to meet the Borough’s identified need</p>	C

						This has also been changed in the document wherever this principle is quoted.	
127	London Borough of Lewisham	2 Overarching Guidance	Living roofs	Living roofs are not mentioned in the document other than a few roof tops are coloured green on drawings, should be emphasised that developments are required where possible to incorporate living roofs (and integrated nest bricks, etc.)	This is a Boroughwide policy and has not been stated in this area specific document.		NC
128	Quaggy Waterways Action Group (QWAG)	2 Overarching guidance	Planting	<p>a) More amenity planting</p> <p>It is not clear whether the approach to planting has been based on a proper ecological assessment. If such a study has informed the Framework that should be set out. The approach to planting seems to continue the current inadequate one of seeing trees and planting mostly as visual amenity. Some consideration of the role of trees in air quality is mentioned but that should not be overstated given that not all tree species are suitable, and trees can only cope with some of the pollution.</p>	<p>Site specific ecological assessments have not been undertaken but would be expected to be undertaken as part of the detailed design for schemes during the pre-application process in accordance with the London Plan Policy for schemes to achieve a biodiversity net-gain.</p> <p>The requirement for schemes to improve the biodiversity and condition of the River Ravensbourne and natural assets has now</p>	<p>The following paragraph has been added to the Overarching Guidance: Recurrent Planting Strategy</p> <p><i>2.34 The A21 Development Framework has not been informed by an ecological assessment of the area. Ecological assessments would be required to be undertaken as part of the detailed design for schemes</i></p>	C

					been emphasised under Principle 5.	<i>going through the pre-application process to demonstrate how they will aim to deliver a biodiversity net gain.</i>	
129	Quaggy Waterways Action Group (QWAG)	2 Overarching guidance	River Ravensbourne	<p>a) Downgrading of the River Ravensbourne</p> <p>The baseline study was posed as being about both the A21 and the River Ravensbourne as twin features of the corridor. The Development Framework seems to have downgraded the river so that it is no longer considered important other than for possible improved access and as an enhancement development. The conditions and potential to improve the river, its condition and functionality seems to have been dropped as the Framework does not explicitly state these as aims and activities. That is a major oversight.</p>	The opportunity to improve the condition of the river is now emphasised in the A21DF.	Principle 5 and paragraph 1.15 have been altered to reflect the desire for the condition of the River Ravensbourne to be improved.	C
130	London Borough of Lewisham	2 overarching	Slanted roofs	Trapezoid and slanted roofs are recommended due to their better performance for air quality but almost all the proposed drawings (Sites 1-19)	There are already some slanted roofs in the document.	-	NC

		guidance		in the document show flat roofs. There is a discrepancy there.			
131	N/A	2 Overarching Guidance	Street furniture	Reduce street clutter and traffic signage where possible, there are far too many signs to see and comply with.	Although it is agreed that it is important to minimise street clutter, this is not a specific issue to the A21 and therefore has not been included in this strategy.		NC
132	TfL	2 Overarching Guidance	TfL	<p>A large number of key [public realm] projects are put forward on page 22 but there is little indication of how they have been selected or method of delivery.</p> <p>A number refer to redesigning junctions on the A21 without a clear explanation of how this is to be achieved.</p>	<p>A sentence has been added to explain how projects were selected.</p> <p>The description of methods for delivery of projects is not part of the scope of this document.</p> <p>The introduction to the emerging transport strategy now emphasises further that detailed design for proposals will follow. Need to</p>	<p>The following 2 paragraphs have been added to the introduction to the public realm projects:</p> <p><i>From the evidence provided in the Baseline Appraisal, the following public realm projects have been identified as a high priority to improve the local environment of the A21 in accordance with the A21 Development Framework</i></p>	

				<p>Unfortunately there is no reference made to recent or planned projects by TfL, Lewisham or third parties. [Please see Table 4 below for a list of all existing TfL projects.]</p> <p>To provide more explanation and justification the list of key [key projects] projects should be more closely related to the character area frameworks, individual site allocations and existing commitments.</p>	<p>All strategic TfL projects have now been included in the document.</p> <p>The public realm projects listed within the “distinctive public realm: Area-based strategy Area-based strategy key projects” list now all feature within the Character Area Frameworks. See below for detail of changes made.</p> <p>Planned TfL projects and existing commitments are included within the list of public realm projects in the distinctive public realm: Area-based strategy Area-based strategy” section.</p>	<p><i>Guiding Principles described at the start of this document. The feasibility of the projects will require testing through the design process.</i></p> <p><i>The location of the following public realm projects are shown on the Character Area Framework maps in section .</i></p> <p>The public realm projects now all feature within the Character Area Frameworks and all strategic TfL projects are included in the A21DF.</p> <p>Please see Table 4 below for a list of all existing TfL projects and detail regarding how</p>	
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						they have been included in the A21 Development Framework.	
133	N/A	2 Overarching Guidance	Traffic	The steady flow of traffic needs more emphasis, speed bumps which lead to stop/go add to pollution.	Further detail on an emerging transport strategy will be produced when the transport strategy is progressed further.		NC
134	TfL	2 Overarching Guidance	Traffic reduction	There are a number of references to reducing levels of traffic or rebalancing road space. While these aims are supported in principle, there is little recognition in the document of the likely impacts on road users or how traffic reduction could be achieved in practice. We would have expected a clearer statement that development should be car free in areas of PTAL 4 – 6, major town centres or Opportunity Areas where car free residential development is a requirement of policy T6.1 in the London Plan 2021. Proposals to move car parking to the back of sites or to screen it are not sufficient. Some of the drawings indicate car parking where it may not be appropriate. See specific comment below on Ravensbourne retail park site.	It is not within the scope of the document to go in to significant further detail on this topic, however, Only blue badge parking is shown on the potential development sites. The parking provision for Ravensbourne Retail Park has been amended to only show blue badge parking. The designs of the potential buildings and parking shown within the capacity studies is	The following paragraph has been added to the Overarching Guidance: Architectural Character Section Parking <i>Development should be car free in areas of PTAL 4 – 6, Lewisham Town Centre, the Opportunity Areas in accordance with policy T6.1 in the London Plan 2021.</i> The provision of parking within the	

				A flexible approach should be taken to Blue Badge parking, consistent with London Plan policy T6.1 and T6.5 and taking account of opportunities for step free access by public transport.	indicative only and would be subject to future testing. Given this is a strategic document it is not possible to go into nuances related to blue badge parking.	Ravensbourne Retail Park scheme has been amended to only show blue badge parking. No change proposed to blue badge parking.	
135	London Borough of Lewisham	2 Overarching guidance	Typo Pg. 24	assuming 'low lover planting' is a typo?	Typo	2.29 Low lover level planting.	C
136	London Borough of Lewisham	2 Overarching Guidance	Urban greening factor	Urban greening factor not mentioned in the whole document, it should be emphasised that developments will be required to achieve 0.4 UGF	Noted.	A new paragraph has been added to A distinctive public realm: Activating Frontages and Ground Floor Experience. <i>2.38 – All new development will be expected to</i>	C

						<i>achieve an Urban Greening Factor score of 0.4 in line with the London Plan Urban Greening Factor London Plan Guidance.</i>	
137	LBL Planning Officer Comment	3 Character Area Frameworks		There is not a masterplan for the Lewisham Park, Hospital and Greens Character area Map as is erroneously stated and the key should state that the development opportunities of the University Hospital Lewisham has not been assessed as part of this study.	Noted.	The key now states the following: University Hospital Lewisham A new bullet point has been added to the text adjacent to the map stating: <i>The redevelopment opportunities of the University Hospital Lewisham have not been assessed as part of this study.</i>	C
138	LBL Planning	3 Character Area		The land required for safeguarding for the potential future delivery of the	Noted.	The BLE safeguarded land is now shown on	C

	Officer Comment	Frame work		Bakerloo Line Extension is not shown on the plans.		the Character Area Framework: Lewisham Town Centre Strategy Map and the Character Area Framework: Ladywell Village Strategy Map https://tfl.maps.arcgis.com/apps/webappviewer/index.html?id=1dac4606dcaa4bee98e6687b707abd49	
139	Lewisham Cyclists	3 Character Area Frameworks		In Downham, Lewisham Cyclists would like to see the emerging transport strategy and framework include improved connectivity to Beckenham place park, by converting the existing Zebra crossing to a tiger crossing and providing connections to an upgraded Literary Heritage Trail Greenway route along Old Bromley Road.	This route is already identified as an east-west route to improve. See Spatial Opportunities: Movement Network. Further detail of the specific changes to the route, such as alterations to an existing crossing, would be decided at a future design stage when funding is committed to this project.	-	NC

140	London and Quadrant Housing Trust	3 Character Area Frameworks		<p>L&Q understand the approach taken to give character areas their own Frameworks to help identify how housing and infrastructure needs can be met.</p> <p>We re-iterate earlier comments provided on the Guiding Principles and Overarching Framework sections that policy should seek to maximise development potential of available sites in order to help address housing need.</p> <p>We recognise the need to enhance and improve infrastructure to support new housing and that a balanced approach is required to help make schemes viable, especially those meeting or exceeding policy requirements for affordable housing delivery.</p> <p>We note the strategic aim to improve river access by unlocking the public realm and integrating the built environment with the waterway. Whilst we support this in principle, we feel it should not dictate or override</p>	<p>Noted.</p> <p>Noted.</p> <p>Strategic aspirations are stated in the A21 Development Framework. The specific public benefits delivered by individual schemes would be assessed through the pre-app and planning process and weighed up to determine planning applications.</p> <p>It is worth noting that the strategic aim to improve river access is consistent with Environment Agency policy and guidance</p>	-	NC
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			<p>other design considerations that are required to deliver viable schemes.</p> <p>We strongly support the delivery of new homes and taller buildings in Lewisham Town Centre given its strong public transport connections and access to social infrastructure. We welcome the promotion of ways to improve sustainable modes of transport and believe that highway improvements should be delivered by the council, with the aid of monies collected through mechanisms such as the Community Infrastructure Levy.</p>	<p>and also the River Corridor Improvement Plan SPD (2015)</p> <p>The delivery of public realm and highways improvements is not part of the scope of the A21 Development Framework. However, the public realm and highways project identified in the A21 Development Framework will feed in to the Site Allocation requirements within the Lewisham Local Plan and will form part of Section 106</p>		
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					negotiations for individual sites.		
141	N/A	3 Character Area Framework		Area framework approach supported but there is a need to look "behind" the A21 to ensure the wider links to the communities are enhanced.	The document promotes east-west links. Further detail regarding enhancing these would be worked out during the detailed design process.		NC
142	N/A	3 Character Area Framework		20 storey buildings are too high; Lewisham is starting to look like a poor version of Croydon !!!	<p>The maximum height for buildings in the Lewisham Town Centre (South) Character Area (formally the Lewisham Town Centre Character Area) is now stated to be 16 storeys which is the height of the existing Lewisham Shopping Centre.</p> <p>It is now further stressed in the document that the height guidance only applies for plots that directly front the A21 and that</p>	<p>Paragraph 2.1 has been amended as follows:</p> <p><i>This section of the A21 Development Framework provides overarching guidance that only applies to the plots that directly front the A21.</i></p> <p><i>[NB text is now in bold and of 2 point larger font than other text.]</i></p> <p>Paragraph 2.3 has been amended as follows:</p>	C

						<p>Guidance on appropriate building heights for different character areas is provided below. Guidance is only provided for plots in the A21 Development Framework study area that directly front the A21. guidance is to help set height limits for each character area.</p> <p>The maximum height now given for the Lewisham Town Centre (South) character area is 16 storeys approx. 48m which is the existing height of the Lewisham Shopping Centre. The intensity of development that could be</p>	
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						<p>appropriate for the area is symbolised as follows “+++”.</p> <p>The final paragraph of page 38 in the draft A21 Development Framework has been altered as follows:</p> <p>New developments of 3-16 storey height along the A21 based on the context</p>	
143	N/A	3 Character Area Frameworks		<p>There is still so much focus on roads and driving. The images do not show the reality with cars and lorries and vans packed in and all of the pollution they cause. This is presenting an unrealistic view and the plans are not bold enough. it should focus on a single lane one way system with large pedestrianised areas.</p>	<p>Noted.</p> <p>The emerging transport strategy in the A21 Development Framework describe the aspiration to encourage less car-use and more sustainable travel. Further exploration of options for road realignment would be undertaken</p>	<p>There are photographs of the traffic today on the A21 within the document.</p>	NC

					as the strategy is progressed and at future design stages.		
144	N/A	3 Character Area Frameworks		The look of Lewisham town centre is already ugly, polluted and terrible - its badly planned.	Noted. The A21 Development Framework provides design guidance for the future delivery of good design.	-	NC
145	N/A	3 Character Area Frameworks		The Waterlink Way which is trumpeted as a big asset, is great but Lewisham town centre is the worst part of it and the hardest to navigate! Not cycle or pedestrian friendly at all.	Noted. The A21 Development Strategy acknowledges that there is a need to improve walking and cycling facilities along and close-by to the A21 but does not provide guidance on how to do this for the whole of Lewisham Town Centre.	-	NC
146	TfL	3 Character area Frameworks		In the character area framework for Lewisham town centre there is a proposal to 'Streamline bus services and improve associated public realm'. It is not clear what is intended by this proposal and we would emphasise that all ideas for bus services would need to be considered by TfL.	The following sentence has been removed: <i>"Streamline bus services and improve associated public realm"</i> . No changes are proposed in the A21 Development	The following sentence has been removed: <i>"Streamline bus services and improve associated public realm"</i> .	

				Road proposals for the town centre also appear to reverse recently introduced changes.	Framework to recently introduced changes to the town centre.		
147	LBL Planning Officer	3 Character Area Framework	2.4 Character Area Framework : Rushey Green and Catford Strategy Page 47 - Typo	Use correct title of Catford Town Centre Framework. It is referred to as a “masterplan” on page 47.	Noted.	Use correct title of Catford Town Centre Framework. It is referred to as a “masterplan” on page 47.	C
148	LBL Planning Officer	3 Character Area Framework	2.5 Character Area Framework : Bellingham “...with greater accessibility to the Ravensbourne”	Document would benefit from the inclusion of a precedent image of a river path in an urban context.	Noted.	Page 52. A photo of the River Pool Linear Park has been inserted.	C
149	London Borough of Lewisham	3 Character Area	All Maps on first pages of Character	Last 2-3 points in list of area character are general characteristics and these points are not indicated on the maps. It is quite confusing and it took me a	Noted.	The numbers have been removed from characteristics that	C


		Frame work	Area Frameworks	few maps before I realised why point 7-9 are not on the map. I would recommend breaking the list up and list the general characteristics (e.g. archaeological priority area) under a separate heading. Maybe General area characteristics		are not given specific locations with corresponding numbers on the maps. For example for Lewisham Town Centre Archaeological Priority Area is no longer numbered.	
150	Lewisham Cyclists	3 Character Area Frameworks	Bellingham	In Bellingham, we would expect segregated cycle lanes to continue from Rushey Green all the way to Downham. Reallocation of carriageway space to prioritise people walking and cycling would be welcomed and also benefit local business.	Noted. The emerging transport strategy in the A21 Development Framework describe the aspiration to encourage less car-use and more sustainable travel. Further exploration of options for road realignment would be undertaken as the strategy is progressed and at future design stages.	-	NC
151	Quaggy Waterways Action Group (QWAG)	3 Character Area Framework	Bellingham	Pages 47-48 and 50, Character Area Framework: Bellingham Strategy The strategy as set out on pages 47 and 48 suggests that the river would only be improved “to make the river path attractive” and to “Increase planting and make the River	Noted.	The text in the key adjacent to the river symbol now reads as follows: <i>Improve public access and the</i>	C


				Ravensbourne and other natural assets more accessible”.		<i>condition and biodiversity of the river.</i>	
152	Theatres Trust	3 Character Area Frameworks	Broadway Theatre	The Trust supports recognition of the Broadway Theatre as a key landmark within Catford and we welcome new public space and an improved setting for this important cultural and heritage asset. We urge early consultation with the theatre and Theatres Trust to ensure such works maintain vital get-in/get-out provision.	Noted	-	S NC
153	LBL Planning Officer Comment	3 Character Area Frameworks	Building Heights	The Bellingham Character Area heights are not consistent with the Ravensbourne Retail Park potential development site indicative massing which is up to 10 storeys.	Noted, see change.	<p>The Guidance for the Bellingham Character Area now reads as follows:</p> <p><i>Prevailing building heights: 6-12m (2-4 storeys)</i></p> <p><i>Proposed Suggested buildings heights: 6-18m (3-6 storeys) and 10 storeys on the Ravensbourne Retail Park Site</i></p>	

						<i>due to its large size.</i>	
154	LBL Planning Officer Comment	3 Charact er Area Frame works	Building Heights	The double asterisks on the Character Area Framework Strategy pages do not seem to reference other double asterisks: ** see Building Heights section for further information on appropriate heights”	Noted, see change.	Text can be adjusted as follows and the double asterisks removed. See Building Heights section for further information on appropriate heights	C
155	TfL	3 Charact er Area Frame works	Character Area Framework s	We have not commented on most of the individual character area frameworks but we do have concerns that some of the transport projects and priorities may not be realistic or clearly justified.	The document now stresses that transport projects will be subject to future testing.	On the Character Area Frameworks Overview page the final paragraph now states: <i>All proposals that would affect the A21 are at a very early stage in their development and will be subject to rigorous testing and assessment if they are developed further.</i>	
156	Lewisham and Greenwich	3 Charact er Area	Ladywell Village	Within the strategy sections concerning the Character Areas for ‘Ladywell Village’ and ‘Lewisham Park,	The definition for buildings of townscape merit has now been	The following definition for	C

<p>NHS Trust/ Avison Young</p>	<p>Frame work</p>	<p>Lewisham Park</p>	<p>Hospital and Greens' (Pages 40 and 42), the Framework identifies various buildings of townscape merit along the corridor, including several buildings on the UHL site.</p> <p>However, we note that the Draft Framework does not include any discussion as to why these buildings are identified as having townscape merit, nor is there detailed information in the supporting Baseline Study.</p> <p>Given the above, we request to review the evidence base which supports the current identification of these buildings as being of townscape merit. Should no evidence be available,</p> <p>then we strongly request that any references to 'buildings of townscape merit' within the Draft Framework be reviewed/removed accordingly.</p>	<p>provided in the Overarching Guidance: Architectural Character Section which is very similar to the definition used in the Lewisham Town Centre Local Plan where buildings of townscape merit are also identified.</p> <p>The buildings of townscape merit within the A21 Development Framework study area make an important contribution towards character and local distinctiveness and their removal could prevent the delivery of Guiding Principle 2: Strengthen the distinctiveness of local centres, enhance the historic environment, and meet local employment and infrastructure needs.</p> <p>The buildings of townscape merit were</p>	<p>buildings of townscape merit is now provided in the Overarching Guidance: Architectural Character section,</p> <p>A new paragraph has been inserted 2.40:</p> <p><i>2.40 Within the Character Area Frameworks section of the document, buildings of townscape merit are identified which are non-designated heritage assets. Buildings of townscape merit add to local distinctiveness and have at least one of the following characteristics:</i></p> <ul style="list-style-type: none"> <i>• They are part of an</i>
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					<p>categorised by Authentic Futures – a heritage consultancy. The buildings located on the Lewisham Hospital site were reviewed by the Council’s Conservation Officer. 2 errors have been identified and corrected in the latest draft of the document.</p>	<p><i>architecturally distinctive groups of buildings</i></p> <ul style="list-style-type: none"> • <i>They are buildings that provide key focal points within the area</i> • <i>They are buildings that are notable for their architectural detailing</i> 	
						<p>2 buildings were incorrectly shown as buildings of townscape merit and have been removed from the Lewisham Park, Hospital and Greens Character Area Framework.</p>	

						They are marked with a blue dot on the map below.	
							
157	London Borough of Lewisham	3 Character Area Frameworks	Ladywell Village	Wearside depot is indicated here as a site that is coming forward through the planning system. What are the plans for this site?	This is an error. This site is safeguarded for the BLE.	<p>The key for the Ladywell Village Character Area Framework Map has been amended to state:</p> <p><i>Safeguarded land for potential Bakerloo Line Extension. Area of Surface Interest.</i></p>	C
158	London Borough of Lewisham	3 Character Area Frameworks	Lewisham Hospital Park and Greens	The guidance proposes greening of the existing London Squares to 'provide safe and relaxing places for hospital patients and visitors' which is great. However previously it was established that seating should not be provided adjacent to the busy main road so there is a contradiction here. Especially if we encourage patients to sit by the road.	Noted.	<p>The following bullet point has been changed as follows:</p> <p><i>Coherent approach to greening of London Squares (linear pocket-parks) to create green space that provides safe and relaxing places for hospital patients</i></p>	C

						<i>and visitors. Seating should be located away from traffic to aim to limit the impact of air pollution.</i>	
159	Landsec Lewisham Limited	3 Character Area Frameworks	Lewisham Town Centre	<p>We also consider that the Draft Framework should make clear graphically which parts of Lewisham Town Centre are excluded from its scope. For example, there is a significant level of spatial overlap between Character Area 1 (Lewisham) shown on page 17 of the Draft Framework and Figure 1.1 of the Lewisham Town Centre Local Plan:</p> 	<p>No changes are proposed in response to this comment. Whilst it is acknowledged that there is a significant level of spatial overlap between the Lewisham Town Centre (South) Character Area (formerly the Lewisham Town Centre Character Area), it is considered that sufficient clarity has been provided regarding which area of the Lewisham Town Centre Local Plan are also covered by the A21 Development Framework as this is shown on the Character Area Framework Map for Lewisham Town Centre (South).</p>	-	NC

				<p>Draft Framework Character Areas (p36) Lewisham Town Centre Local Plan Boundary Figure 1.1 (p7)</p> <p>For all involved in bringing forward development proposals within Lewisham Town Centre, it is important that the Draft Framework is absolutely clear and unambiguous on which parts of the town centre it applies to.</p> <p>This should be made clear upfront in the Draft Framework when the Study Area is first introduced (page 4).</p>	<p>In addition, the following clarity is provided regarding the guidance on building heights in the document. The Overarching Guidance on Building Heights states clearly “Guidance is only provided for plots in the A21 Development Framework study area that directly front the A21.”</p>		
160	Landsec Lewisham Limited	3 Character Area Frameworks	Lewisham Town Centre	<p>In this context, we do not believe that it is helpful for the diagram on page 38 of the Draft Framework to be showing development parameters for Lewisham Shopping Centre. It currently shows new/improved connections as well a potential new mixed-use frontage around the whole of the shopping centre site. In our view such development parameters should be removed as they are more appropriately addressed in the other documents referred to above.</p>	Noted.	<p>The following changes have been made to the Lewisham Town Centre (South) Character Area Framework Strategy map:</p> <ul style="list-style-type: none"> -The potential new mixed-use frontage around the whole of the Lewisham Shopping Centre 	C

						<p>site has been removed.</p> <ul style="list-style-type: none"> -The 2 x indications to improve east-west connections through the shopping have been removed. -The Lewisham Shopping Centre is now clearly labelled as being excluded from this study on the Character Area Framework Lewisham Town Centre (South) Map. 	
161	Quaggy Waterways Action Group (QWAG)	3 Character Area Framework	Lewisham Town Centre	<p>Page 38, Character Area Framework: Lewisham Town Centre</p> <p>The strategy as set down in the diagram on page 38 does not reflect the discussion on the baseline study about opening up the River Quaggy in central Lewisham, and that would be a considerable missed opportunity</p>	Proposals for the Quaggy River within Lewisham Town Centre are covered by the Lewisham Town Centre Local Plan DPD.	NC	C
162	LBL Planning Officer	3 Character Area	P44. Lewisham Hospital, Parks and	The meaning is unclear of the following text on the Strategy page.	Delete the following text.	Delete the following text:	C

		Frame works	Green Character Area Framework.			“Typology studies set precedent for revised corridor treatment”	
163	LBL Planning Officer	3 Character Area Frameworks	Page 40. Lewisham Town Centre Character Area Framework	Map indicates the A21 extending on to the A20 which is incorrect where Molesworth Street (A21) joins the A20.	Correct this error.	The arrow indicating the extension of the A21 on to the A20 has been removed.	C
164	LBL Planning Officer	3 Character Area Frameworks	Page 47, (January draft). 2.4 Character Area Framework : Rushey Green and Catford Strategy – text adjacent to map.	The Catford Town Centre Framework does not have the correct title.	Correction made.	Replace the following bullet point “Catford TC masterplan to deliver housing growth and new public realm benefits” Replace with the following: <i>See the Catford Town Centre Framework for further guidance for this area pm delivering housing growth and public realm improvements.</i>	C

165	London Borough of Lewisham	3 Character Area Frameworks	Southend	<p>This point is on Downham Woodland Walk which is a statutory Local Nature Reserve so I would suggest naming this place instead of just referring to it as the Green Chain Walk. And it is not called Hither Green Nature Reserve for many years now but Grove Park Local Nature Reserve.</p> <p>You could also consider mentioning that DWW links to the Railway Children's Walk which features in the recently accepted Grove Park Neighbourhood Plan.</p>	<p>These corrections to titles have been made.</p> <p>The link to the Railway Children's Walk is now shown on the map.</p>	<p>2.7 Existing Character Area point 5 has been changed as follows:</p> <p><i>5. Downham Woodland Walk (Statutory Local Nature Reserve) which is part of the Green Chain Walk that links Beckenham Place Park to the Hither Green Nature Reserve and the Railway Children's Walk described in the Grove Park Neighbourhood Plan.</i></p>	C
166	Phoenix Community Housing	3 Character Area Frameworks	Southend and Downham Bellingham	<p>The upper ends of the height ranges proposed for Bellingham (6 storeys), Southend and Downham (both 5 storeys) seem reasonable and sensitive overall. PCH and indeed the residents they represent would be nervous to increase the upper limit of the guidance, though acknowledge that additional height is appropriate on corner sites and where rooflines</p>	<p>Given this is a strategic document, further detail on height guidance will not be provided.</p> <p>The document states that "heights for specific sites will be subject to further</p>	<p>-</p> <p>-</p>	NC

			<p>are already irregular. The guidance is not clear as to whether in these instances height is encouraged over and above the upper limit, or that it is only in these instances that the upper limit is appropriate.</p> <p>Whilst lower-rise development should remain the norm for this part of the Borough, the lower end of the height range for Southend and Downham (just 2/3 storeys) is not considered to be sufficiently ambitious, given that most buildings now enjoy Permitted Development rights for vertical extension/redevelopment to greater height under the Prior Approval process. For sites that are not on strategic corners or are part of a uniform roofline the Framework seems to be discouraging of anything above the prevailing height (which may be just 2 storeys in many instances), and this in turn may encourage developers down the Permitted Development route where the principle of greater height is already acceptable subject to a reduced assessment criteria, potentially leading to lower quality development with less public benefits.</p>	<p>testing through the pre-application process which may determine that lower or taller development than the indicative thresholds is appropriate. “</p> <p>Because of the predominant low-rise height of buildings in Southend and Downham we consider that 2/3 storeys could be appropriate for some sites. For some sites it may be demonstrated that parts of sites are appropriate at 2/3 storeys but other parts of the sites can be taller which could assist viability.</p>	-	NC
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				<p>Height ranges of 4-6, and 3-5 storeys could alleviate this somewhat and would acknowledge the potential future height baseline brought about by recent changes to the permitted development order.</p> <p>Notwithstanding the above, there must be recognition that certain sites will need to breach the height parameters of their character area to be viable, particularly given that the vast majority (if not all) of the draft allocations within the study area are brownfield sites. There is recognition within the document that increased height is plausible within the centre of larger developments, and it should be made clear that this can exceed the upper height limit stipulated by the Framework for that area, provided that the scheme carries substantial public benefits - for instance overprovision of affordable housing, excellent green credentials, or is a quality addition to the architecture of the area.</p>			
167	LBL Planning Officer	3 Charact er Area Frame works	Southend.	The location of Peter Pan Park is not shown correctly on the Strategy map: page 54	Correction made.	Map corrected to show correct location of the Peter Pan Park the western side of the A21 to the	C

						south-east of Homebase.	
168	London and Quadrant Housing Trust	4 Design guidance		The design principles for undesignated sites with medium to long term development potential are noted. To achieve higher density residential developments in the less developed, southern parts of the corridor, there will be a need to move towards different housing typologies, this may include mansion blocks. This will require a departure from the traditional housing typologies and we believe that Lewisham should consider alternative designs for high density homes such as modular housing.	Guidance is not provided on typologies for redevelopment or construction methods.	-	NC
169	London and Quadrant Housing Trust	4 Design guidance		In particular, we note the guidance on employment-led sites. L&Q supports mixed-use developments as a way of helping to create successful places and providing active frontage at ground level. Whilst the mixing of residential with employment uses is not uncommon we would highlight the challenges of mixing residential with industrial type employment uses. This is due to the likely conflict between these uses as well as the	The design challenges related to the co-location on sites of employment and residential uses are noted, but the need for new housing and the retention of employment space means that this is an appropriate option for some sites. Detail	-	NC

				significant and complex design challenges associated in providing residential above industrial employment uses. Flexibility should be applied to policy requirements in order to achieve a practical solution on needs such as cycle and car parking, delivery and servicing plans, waste provision and amenity space needs.	regarding the specifics of what is delivered for individual sites will be advised on during the pre-application process for schemes on these sites.		
170	N/A	4 Design Guidance		Supported especially the issue of employment opportunities.	Noted	-	S NC
171	N/A	4 Design guidance		More connectivity for cyclists is a must - its needs to be planned so that cycling is a viable alternative to driving with a focus on commuters - i.e. direct, fast, protected, unhindered (no dismount or cycle barriers!!), green and safe routes with plenty of cycle parking.	Noted. The delivery of a segregated cycle route as proposed in the A21 Development Framework would achieve this. Further specific design detail would be worked through as and when funding becomes available to develop plans further.	-	NC
172	London Borough of Lewisham	4 Design Guidance	Pg. 60	I am really glad to see the comment on incentivising local residents to green their front gardens	Noted.	-	S NC
173	London Borough	4 Design	Terraced parades	This page does not mention greening and it would be good if it did. Consider adding to the point about	Noted.	The following drawing label has	C

	of Lewisham	Guidance	Pg. 61	'not overdeveloping the site' and providing amenity. Green infrastructure delivers both amenity and biodiversity services.		<p>been amended as follows:</p> <p><i>Make sure the site is not overdeveloped and provide sufficient amenity space and greenery for the residents</i></p> <p>The following additional label has been provided for the green buffer between the road and the footway:</p> <p><i>Provide a green buffer for visual amenity, to increase biodiversity and to mitigate pollution.</i></p>	
174	LBL Planning Officer	4 Typological Guidance	Terraced Parades: Comprehensive Redevelopment	Comprehensive Redevelopment of a Terraced Parade diagram – Raising height of a building within a terrace is not consistent with the overarching guidance on height which states that where terraces are of a consistent height the height of individual	Noted.	The height within the existing terrace on the diagram will be varied to allow for increasing the height of some	C

				buildings within a terraced parade should not be increased.		buildings within the terrace.	
175	LBL Planning Officer	4 Typological Guidance	Terraced Parades: Comprehensive Redevelopment, Diagram	It is not safe to locate childrens play adjacent to the road.	Noted.	The play space has been removed from the diagram.	C
176	Woodland Trust	4 Design guidance	Trees	<p>We welcome the recognition that trees play an important role in all typologies, reflecting the emerging National Model Design Code.</p> <p>We recommend the following elements in any future design guide for the A21 corridor:</p> <p>1. A presumption that existing trees will be retained</p> <p>The starting point for any development should be based on an understanding of existing trees, mapped and categorised in line with BS5837 Trees in relation to construction and design.</p> <p>Design codes should outline how design should be informed by this understanding, with impacts on existing trees and woods minimised and require clear, evidenced and</p>	<p>Noted.</p> <p>As this is a strategic document covering many themes related to the design of the street, it is not possible to go in to any further detail regarding the treatment of existing and future trees within the A21 Development Framework study area.</p>	-	NC

				<p>justified reasons for the removal of any trees.</p> <p>2. Buffer zones to protect ancient woodlands and ancient and veteran trees and other mitigation In order to reduce the indirect impacts of development on woods and trees, buffer zones are essential. Buffer zones also provide space to support natural regeneration of ancient woodland, or space to support tree planting.</p> <p>3. Increase in canopy cover For new development, the Woodland Trust advocates for a minimum 30% canopy cover. This level, and higher, has been shown to have significant health and wellbeing benefits. Delivering new and enhancing access to green spaces, including woodland should also be supported through design codes.</p> <p>We would welcome the opportunity to discuss and advise further as your plans develop.</p>			
177	Lewisham and Greenwich NHS Trust/	5 Potential Development Sites		<p>We also note that the Framework identifies potential development sites along the A21 corridor within pages 70-156 of the document. However, we do not consider this to be an exhaustive list and further sites within</p>	<p>The Framework makes it clear that other sites may come forward for development beyond those categorised as potential development</p>	<p>The following paragraph has been added to page 70 –</p>	C

Avison Young			<p>the A21 corridor could come forward for development during the emerging Local Plan period which should be considered on their own merit. The Draft Framework should be updated to acknowledge this context. Furthermore, the wider UHL site is not identified as a potential development site, however, it is noted in the diagram on Page 42 as an 'area covered by wider masterplan' (shaded light blue).</p> <p>However, there is no further discussion within the Framework concerning this matter, nor is there any reference to this in the Council's emerging Local Plan. We consider that the Draft Framework should be updated to reflect that:</p> <ul style="list-style-type: none"> - Overall, the UHL site is a key redevelopment and regeneration opportunity within the A21 area. - As such, the Draft Framework should reflect this context, through identifying that development, of hospital-relates uses or other potential uses (in the form of potential enabling development), could come forward on the UHL site as part of a wider masterplan led process in the future. 	<p>sites in the A21 Development Framework.</p> <p>The framework refers to masterplanning work that as we understand is being undertaken by Lewisham and Greenwich NHS trust.</p> <p>The Framework reflects and builds on the emerging Local Plan which in turn reflects the one public estate approach developed by the NHS trust.</p> <p>In order for the Lewisham Hospital Site to be considered as a key development and regeneration opportunity it would have to satisfy London Plan Policy S1 Developing London's social infrastructure with an agreed transformational plan</p>	<p><i>This is not an exhaustive list of potential development sites and it is recognised that some of the sites indicated may not come forward whilst other, new sites may come forward through the planning process.</i></p>	
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					<p>for consolidating and improving services.</p> <p>At this stage we do not have these details and therefore this information will not be included in the A21 Development Framework.</p>		
178	London Borough of Lewisham	5 Potential development sites	Site 13 Bellingham Character Area	It would probably be more beneficial for ecology and probably for locals to have a larger green space by the river and move the buildings farther away. I note that there is an enclosed green area proposed in the middle but this area will be overshadowed by the tall buildings on the south side so it would probably be better to reduce this area to have a larger area by the river (or break out the river if possible)	Agreed	Plans amended to reflect Fig 3 Proposed massing diagram which shows a significant set back from river.	C
179	N/A	5 Potential development sites		This is OK but optimistic, most of these sites will not become available and that rather reduces the impact of the plan. Why not focus on those in the public domain which could be developed and add more detail or options to each opportunity.	We recognise that further work needs to be developed on public realm, landscape and street projects along the corridor. As this is a strategic framework document this will	No change	NC

					have to be progressed at a later date.		
180	N/A	5 Potential development sites		Very happy to see that car parks are being looked at for development. With ample public transport options for people to take to get into the different Lewisham high streets. There's two massive problems we face at the moment, not enough housing and excessive car use. Reutilising car parks for housing should go towards solving both of these.	Agreed	No change	NC
181	LBL Planning Officer	5 Potential Development Sites	All sites.	The non-residential floorspace needs a unit. Is it metre squared?			C
182	Culverley Green Residents Association	5 potential development sites	Bellingham Character Area	*Please see Table 3 below for all comments received from the Culverley Green Residents Association.	We note your comments and we have considered them carefully. For the sake of brevity we have provided an overall response to the main points outlined in your submission. Character Area/Framework	Sites 10 and 12 have been removed from the A21 Development Framework. Site 11: The development frontage has been set back from the A21 and the landscaped area has been retained	C

				<p>We agree that the document is somewhat confusing in that the Culverley Green area hasn't been given an area framework, but does contain proposed sites, that are considered in the Bellingham Framework. This has been addressed as we have removed sites 10 & 12 from the document for the reasons set out below.</p> <p>We recognise that the character areas defined in the A21 Development Framework are not absolute and indeed the definition of places, neighbourhoods and character areas can be blurred, can often overlap and be different depending on who is responding. The character areas defined in the A21</p>	<p>on the Character Area Framework Strategy map. However, the accompanying text has been amended to allow for the possibility of relocating some of the green space within the green verge fronting the A21 to a different location within the site adjacent to the river where it could have a higher amenity value. Narrowing the green space could also have the benefit of increasing visibility of commercial frontages from the A21.</p> <p>The opportunity to test building line frontage onto the A21 to retain trees and landscape strip but also</p>	
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				<p>were drawn from the Characterisation Study June 2019 but also an assessment of the urban typologies prevalent along the corridor. In this assessment the Ravensbourne Retail Park (site 11) was deemed to be more consistent with the large big box urban typologies prevalent within Bellingham and the adjacent Strategic Industrial Land Sites rather than Culverley Green.</p> <p>Site 10 Following ongoing consultation on the draft Local Plan Site 10 has been removed from the A21 Development framework.</p> <p>Site 11 The Council can find no records of the landscape to the front</p>	<p>ensure suitable surveillance of street and viability of non-residential uses has been included in the text.</p> <p>Taller elements of the development have been moved into the centre of the site to reduce their impact on the setting of the Culverley Green Conservation Area.</p> <p>The height of development fronting Barmeston Road has been reduced to 4 storeys.</p>	
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					<p>of the site being identified as a London Square and it is not included on either of the schedules attached to the 1931 Act. If you have any further details on this then please let us know.</p> <p>With regard to development frontage along the A21 we recognise the value of the tree planting and landscape strip but do believe there may be benefits in pushing development frontage closer to the Street in order to provide better natural surveillance and make non-residential uses more visible and viable. We are also very keen to ensure that a large public space is delivered adjacent to the river and that options are explored to re-naturalise and improve public access</p>		
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				<p>to the river. As with all sites we have to ensure they are deliverable and consider viability. It may be that by moving development closer to the street we can achieve better outcomes along the A21 corridor and ensure more public space is provided adjacent to the river. At this time we have chosen to move the street frontage back but will encourage the landowner to test options through the planning process in due course.</p> <p>In terms of scale and massing the A21 Development Framework is responding to the indicative capacities outlined in the site allocation of the draft Local Plan Regulation 18 document. This in</p>		
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					<p>turn is responding to London plan policy GG2 Making the best use of land which recognises the shortage of land across London and the challenge to solve the capitals housing crisis. It directs that development must optimise development capacity. We acknowledge that this site will be a significant step change in terms of density but are confident that the site is of a sufficient size that this can be achieved successfully and mitigate the impact on the surrounding conservation area. Further testing will be carried out through the planning process.</p> <p>Site 12 Site 12 has been removed from the A21 Development</p>		
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					framework and development proposals moving forward will be considered with regard to the councils adopted Small Sites SPD.		
183	Historic England	5 Potential development sites	Bellingham Character Area Site 12	We would point out that this site is actually just within the Culverley Green conservation area and any new development should therefore be considered in this light.	Agreed	Reference added to Culverley Green Conservation Area in Overall Principals	C
184	Phoenix Community Housing	5 Potential Development Sites	Catford Police station	Catford Police Station is one such site that is suitable to, and may need to, eclipse the 5 storey upper limit suggested for the Southend character area. Its A21 frontage is already 4 storeys and is the most heritage-significant part of the locally listed building. The costs associated with retaining and converting that element, together with demolishing and redeveloping the remainder of the complex means that additional height will be needed to see the viability become healthy enough to deliver over the 50% level of affordable housing that should be expected on former public sector land. It is useful that its capacity study	The development Framework provides design guidance and is not absolute. The section on building heights makes clear in paragraph 2.9 "Heights for specific sites will be subject to further testing through the pre-application process which may determine that lower or taller development than the indicative thresholds is appropriate.	No change	NC

				is not prescriptive in terms of an upper height limit, and PCH supports this omission. However, such an important, relatively large yet constrained site should be allocated for more than the 39 units indicated if it is to be deliverable.			
185	London Borough of Lewisham	5 Potential development sites	Downham Character Area Site 17	Linking to my comment above about examples with green walls, this corner development could be inspired by these plans in London? https://www.dezeen.com/2019/11/11/citicape-house-green-wall-architecture-sheppard-robson/ (I don't know what phase this development is but how great it would be to have something similar in Lewisham?)	Too much detail for a Framework document	No change	NC
186	London Borough of Lewisham	5 Potential development sites	Downham Character Area Site 18	based on the proposal it seems that the existing green area will be lost by the development. As much as possible we should aim and encourage the retention of not just trees but existing green areas because they are more beneficial for climate, biodiversity and the community than newly planted soft landscaping	This needs to be balanced against the need to deliver more housing.	Text added to overall principles – <i>retain existing and trees and significant green space.</i>	C
187	G R Planning Consultancy Ltd	5 Potential Development Sites	Homebase Site	I refer to the consultation on the draft A21 Development Framework (A21 Framework) and your circular letter dated 6 October 2021 inviting comments on the draft by 12 November 2021.	The A21 Development Framework does not currently include the Homebase Site as a Development Site in Section 5 however it	No change	NC

			<p>I act on behalf of HHGL Ltd, which trades as Homebase within the UK & Ireland. The Council consulted my clients in relation to their Homebase store on Beckenham Hill Road in Catford.</p> <p>As you may be aware, my clients have already submitted representations in relation to the proposed allocation of their store in the Regulation 18 Lewisham Local Plan (Local Plan). These representations, set out in our letter dated 5 May 2021, were accepted as being duly made.</p> <p>They led to a Teams Meeting on 10 June 2021 with Erik Nilsen and David Syme from the Council's Planning Policy Section. During this Teams Meeting it was agreed that further discussions with my clients would take place once Officers had spoken to the Landlords (owner) of the Homebase site and were in a more advanced position with the preparation of the Regulation 19 version of the Local Plan.</p>	<p>does identify the site as a Site Allocation in the draft Local Plan.</p> <p>We are in the process of considering all representations to the Local Plan, including landowners and leaseholders of sites through the Local Plan process.</p> <p>As discussed at our meeting the site was identified through the London SHLAA and nominated within the call for sites process. The draft Local Plan identifies the site for mixed-use development with a re-provision of town centre uses with residential above.</p> <p>The Council is responding to London Plan policy H1 Increasing housing supply which states that development</p>		
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			<p>We have not received any further feedback from Officers, and neither have we received any information on the likely timeline for the publication of the Regulation 19 version of the Local Plan.</p> <p>Notwithstanding the above, my client's position, in relation to their Homebase store on Beckenham Hill Road, remains unchanged and is as set out in our representations to the Local Plan.</p> <p>In summary, these representations confirmed that the Homebase business was emerging strongly from the impact of Covid 19, and was seeking to grow and expand its portfolio, as well as preserve the existing jobs that its Catford store supported, and the thousands of jobs that the business supported throughout the UK. That position and strategy, moving forward, has not changed.</p> <p>Continued 2</p> <p>Homebase remains one of the most recognisable retailers in the UK, and the introduction of new ranges and concessions, continuing investment in its staff qualifications, knowledge and expertise, and its</p>	<p>plans should optimise the potential for housing delivery on all suitable and available brownfield sites, especially from the following sources of capacity: b) mixed-use redevelopment of car parks and low-density retail parks and supermarkets.</p>		
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future commitment to ongoing investment in refurbishing existing stores, has placed the business in an extremely strong position to assist with the UK's economic recovery post Covid 19.

The current lease on the Homebase store in Catford extends to September 2025. The store is successful and profitable, with a loyal customer base and experienced staff. Homebase are firmly committed to retaining its representation on site and will be seeking to renew their lease at the appropriate time.

In relation to the Local Plan, our representations confirmed my clients' strong objections to policy LSA4 and Site Allocation 10, which identified Homebase as part of an opportunity site for a residential led mixed-use scheme with an indicative capacity for 141 residential units and 5,694 square metres of main town centre uses. Our representations confirmed that a planning policy and/or allocation which would precipitate the closure of its Catford Homebase would be contrary to national policy and specifically paragraph 81 of the National Planning

Policy Framework (July 2021). The latter states that planning policies should assist in creating the conditions in which businesses, such as Homebase, can invest, expand and adapt, as well as requiring significant weight to be placed on the need to support economic growth and local business needs.

Our representations also confirmed that Homebase's Beckenham Hill Road store was located within a well-established retail destination and comprised a store that met and continues to meet their business requirements. The store was also recognised as being an important part of the comparison offer of this part of Lewisham.

Within the A21 Framework, the Homebase site comes under section 2.6, 'Southend Character Area'. Whilst the Homebase is shown on the plans and images on pages 51 – 53 (inclusive) to that section, as a potential site that could accommodate taller buildings and high density residential development, the section on 'Potential Development Sites' (for the Southend area) includes no reference to the

			<p>Homebase site or to it being a potential redevelopment site. It is unclear whether the latter is an error or simple omission, but, even so, there is a clear contradiction in the A21 Framework between the contents of section 2.6 and the section on 'Potential Development Sites' (insofar as this relates to the Homebase store).</p> <p>If the intention of the A21 Framework is to continue to promote the Homebase site for redevelopment, without any options to incorporate the store within that redevelopment scheme or relocate it elsewhere (to a site that met Homebase's business, operational and customer requirements and was commercially viable), then my clients have no other recourse than to strongly object to the proposals in the A21 Framework insofar as they apply to the Homebase site.</p> <p>Continued 3</p> <p>If the latter is not the intention, then the A21 Framework must be amended to remove any contradiction that currently exists and to confirm that the Homebase will remain on site (the status</p>			
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quo), and continue to perform its important role in supporting the comparison offer of this part of Lewisham and in providing for local employment.

As with our representations to the Local Plan, my clients remain keen to engage with Officers over the Council's draft proposals for this site, with a view to reaching an agreed position that would address Homebase's significant concerns with the A21 Framework as drafted. If that is not possible, then my clients will continue to formally object to the A21 Framework and emerging Local Plan, and seek to pursue those objections through all the appropriate avenues that are available to them

I would be grateful if you could acknowledge receipt of this letter and confirm the timeline for the next stages of the draft A21 Framework.

I would, of course, be happy to discuss any aspect of the above further or provide any additional information on my client's position that may assist the Council in moving forward.

188	LBL Planning Officer	5 Potenti al Develo pment Sites	Indicative Massing Massing studies	It is unduly prescriptive to describe the massing as proposed massing, given further testing would be required. Suggest propped massing is described as Indicative Massing	Noted.	Change all titles of massing drawings from “Proposed Massing” to “Indicative Massing”2.3	C
189	London and Quadrant Housing Trust	5 Potenti al develop ment sites	Land at Endgate Street	<p>L&Q has a long leasehold interest at 226-230 The Camden Villas in Allocated Site 2 – Land at Endgate Street. We understand that these properties are locally listed. The Additions to Lewisham’s Local List (Adopted March 2020) advises that the properties were built in 1830-1840 and are considered architecturally classical and orderly. However, these buildings have been subject to alterations and conversion over time which may have impacted the heritage value of the properties.</p> <p>We note the indicative capacity study Option A indicates the retention of the terrace at Nos. 226-230 and redevelopment of the surrounding sites for buildings of c. 7 storeys. Should Nos. 226-230 be retained within any masterplan redevelopment of the wider allocated site L&Q support the principle of sympathetic massing to ensure new development</p>	Agreed	Indicative massing has been provided which steps down towards the locally listed buildings.	NC

				integrates with existing properties and does not impact their amenity or heritage value.			
190	Avison Young representing an individual	5 Potential Development Sites	Land at Randlesdown Road	*Please see Table 2 for all comments received from Avison Young acting on behalf of the Land Owner.	<p>We note your comments and we have considered them carefully. For the sake of brevity we have provided an overall response to the main points outlined in your submission.</p> <p>Land Use The draft Framework explores the possibility of an employment led mixed-use scheme with a limited amount of residential along Randlesdown Road where the existing retail parade currently exists. However following ongoing consultation with the GLA on the Local Plan it is unlikely that the site will be de-designated through the Local Plan process. As such any</p>	<p>Remove residential component from Site 13</p> <p>Ensure the layout on page 129 are consistent with the indicative massing and show the open space adjacent to the river.</p> <p>Ensure site 13 outlines are consistent on page 67 Typological guidance and clearly label this as site 13</p>	C

					<p>redevelopment with co-location will be assessed against London Plan policy E5 and E7 and with regard to GLA guidance.</p> <p>Also just to clarify the indicative capacity for non-residential use is indicated as 4,725m² within the A21 Development Framework based on the indicative layouts and massing proposed.</p> <p>Scale and massing With regard to scale and massing the Framework outlines an indicative massing proposal which is deemed appropriate for the location and adjacent context.</p> <p>The policies on tall buildings within the emerging Local Plan will be subject to change to respond to comments received</p>		
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					<p>during the Regulation 18 consultation and changes in the now adopted London Plan. Any redevelopment of the site will be assessed against adopted and emerging policies.</p> <p>Public access to the river and open space The council has an aspiration to improve access and naturalise the river ways wherever possible. The council's adopted River Corridor Improvement SPD provides further details. This will be the starting point for any discussions with sites adjacent to the river. In terms of open space the site falls within an area of deficiency as outlined in the draft Local Plan Fig 10.4 and 10.5 and as such the starting point for any discussion for redevelopment will be</p>		
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					<p>how the site can improve this situation.</p> <p>Status of the document As a Framework document the A21 Development Framework will not be part of the council's statutory Development Plan and will therefore not carry weight as a Development Plan Document (DPD) or Supplementary Planning Documents (SPD). However it may be a material consideration when considering planning decisions.</p> <p>Please note representations on the Local Plan will be dealt with through the Local Plan process.</p>		
191	Historic England	5 Potential Development	Lewisham Character Area Site 2	It would be helpful if it was made explicit that the locally listed villas within the site are to be retained in any redevelopment.	Agreed	Text added in Overall Principle – <i>retain the locally listed villas</i>	C

		ment sites					
192	London Borough of Lewisham	5 Potential Development Sites	Lewisham Character Area Pg. 72 Pg. 78 SINCs	[Sites 1 and 2] are adjacent to SINCs (and river) so ecology and impact on these important nature conservation sites need to be considered and would be good if this was flagged here in this document as well. I see way too many planning applications by SINCs without an ecology report so the more we emphasise this the better. It is important on all sites but especially on those that are by the river or SINCs that net gain for biodiversity needs to be achieved so prevention of negative impacts on these sites are essential and improvement of the development for biodiversity is important (e.g. sensitive lighting, bird and bat bricks, living roofs, living walls).	Site 1 - The Molesworth Street Car Park Site has been removed because it lies within Flood Zone 3B so this comment no longer applies to this site. The following text has been added to overall principles of Site 2: Endgate Street– <i>Improve and enhance adjacent SINC and achieve net gains for biodiversity</i>	Site 1 - The Molesworth Street Car Park Site has been removed because it lies within Flood Zone 3B so this comment no longer applies to this site. The following text has been added to overall principles of Site 2 – <i>Improve and enhance adjacent SINC and achieve net gains for biodiversity</i>	C
193	N/A	5 potential development sites	Lewisham Character Area Site 3	As one of the property owners in the 203-221 Lewisham High Street area I would like to express our serious concerns about the potential negative effect on business possibilities of certain aspects of this very extensive plan. The High Street in Lewisham – like many others – is really under threat and many shops will struggle to	The council owned site would only come forward as part of a comprehensive review of parking within the town centre and take into account the impact and views of local business.	No change	NC

			<p>survive if their needs are not considered.</p> <p>On Page 78 there are proposed to be major changes to the area directly facing our property – which will obviously involve considerable disruption with demolition/ construction work over a lengthy period.</p> <p>Of more immediate concern is the section on page 82/ 83/ 84 – in particular site 3 – the redevelopment of Slaithwaite Road Car Park.</p> <p>It is not immediately clear about the timescale of these proposals – but please bear in mind that Lewisham High Street has always primarily been a retail shopping area.</p> <p>While we are aware of the ‘anti-car’ policies of Lewisham Council it is really important to consider that in the short to medium term a large number of shoppers (and our customers) do and will continue to use private cars when they go shopping. (on a recent cool and dull morning in late October it was notable that the above-mentioned Car Park was around 90 percent occupied at 11am</p>	<p>With regard to the perceived “anti-car” policies Lewisham is responding to the Mayor of London’s transport strategy and the London Plan which states that “Development Plans should support, and development proposals should facilitate: the delivery of the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041.”</p> <p>Lewisham Town Centre has excellent access to public transport in the form of rail, overground services, bus routes as well as good walking and cycling links.</p> <p>Lewisham Council was also one of the first Local Authorities to</p>		
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			<p>in Sunday. With no parking facilities these people will surely choose to travel to other more 'attractive' shopping areas such as Bromley).</p> <p>As we are slightly away from the Lewisham Market and the pedestrianised section of the High Street one of the few advantages of our location is that we are conveniently positioned backing onto the Slaithwaite Car Park. Many of our customers visit out business on their way to the market and pedestrianised section of the high street – entering the shop via the rear door (Clipper Way).</p> <p>We are very concerned that the proposed 'removal' of the Car Park will have a very adverse effect on the business value of our property – which like all retail outlets has been experiencing major difficulties with Cobvid and other related matters. It will also be necessary to have numerous parking with Re-Charging points for Electric Vehicles in the near future.</p> <p>It is also of extreme importance to make allowance for delivery vehicles to have straightforward access to</p>	<p>declare a climate emergency and recognises that in order to reduce carbon emissions and improve air quality we must reduce the reliance on cars.</p>		
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Clipper Way – in order to bring goods to the rear entrance of the property. (There is obviously no way for deliveries to be made through the front entrance as this section of the High Street is extremely congested and is all in a ‘no Parking/ No Stopping’ sector. Obviously all retail businesses need to bring in stock regularly.

We have already suffered major problems over a lengthy period with the Morley Road junction onto the High Street being closed for many months during the construction of the new hotel – which combined with the many local road closures/ restrictions has made life very difficult for essential delivery drivers.

Not only would the removal of the Slaithwaite Car Park be potentially disastrous for commercial properties – but the proposed redevelopment of the site would surely mean considerable disruption and congestion as we would effectively be backing directly onto a large building site for a long period of time.

I think that there are some parts of the very detailed planning document

				<p>that do actually support my views regarding the delicate situation of maintaining a 'healthy' High Street. Of course new housing is needed – but there also need to be facilities (including retail outlets) to serve the very same residents that you aim to attract.</p> <p>On page 159 (2.3 Constraints) it states: Parking in regional shopping centres can be perceived to be key to holding economic activity.</p> <p>I do hope you will take my comments into consideration – as in the current and very tough economic situation I fear it would not take many bad decisions to result in yet more empty shops on Lewisham High Street.</p>			
194	Quaggy Waterways Action Group (QWAG)	5 Potential Development Sites	Lewisham Character Area	Page 74 – typographical errors: “The residential development will be subject of approval of the deign (sic) from the Environmental (sic) Agency given the site is in a Flood Zone 3B.”	Noted	Site removed	
195	LBL Officer Comment	5 Potential Development Sites	Lewisham Hospital Typo	The correct name for Lewisham Hospital is University Hospital Lewisham.	Noted.	All references to Lewisham Hospital have been replaced with University Hospital Lewisham.	C

196	TfL	5 Potential Development Sites	Molesworth Street Car Park Endgate Street	One specific point is that the Molesworth Street Car Park and Endgate Street sites in Lewisham town centre should include the possibility of a temporary or possibly permanent bus stand to replace the one at Thurston Road, in connection with the BLE project.	The Molesworth Street Car Park site has been removed as a potential development site. The Endgate street site is required for housing and other uses and therefore cannot be allocated for a permanent or temporary bus stand.	No changes.	
197	LBL Planning Officer	5 Potential Development Sites	Page 73. Title	Typol Endgate Street mis-spelt Engate Street	Noted.	Corrected	C
198	LBL Planning Officer	5 Potential Development Sites	Potential Development Sites: Overview	There are sites that lie within the A21 Development Framework Study Area that are identified as key sites in the Catford Town Centre Area Framework that are not identified as potential development sites in the A21 Development Framework.	Noted. Text has been altered to address this comment.	An additional bullet point has been added at the end of the page: Please see the Catford Town Centre Area Framework for guidance on additional sites that lie within both the A21	C

						Development Framework.	
199	N/A	5 Potential development sites	Ravensbourne retail park	All of these sites could definitely be redeveloped and fully support them (if they're not huge tower blocks!!) Ravensbourne Retail Park must be a priority for development as it hugely promotes driving and pollution in the area. More parks and green space, more access to the river and new cycle connections are a must. No high rises! 4 stories max. Bellingham and the surrounding area shouldn't become like Lewisham with towering high rises.	We thank you for your support on the sites. With regard to the scale and density of development sites the Framework responds to the existing and emerging character along the corridor as well as responding to London plan policy GG2 Making the best use of land. This policy recognises the shortage of land across London and the challenge to solve the capitals housing crisis. It directs that development on sites must optimise development capacity.	No change	NC
200	TfL	5 Potential	Ravensbourne Retail Park	Ravensbourne Retail Park (option A) proposes 220 car parking spaces equivalent to 0.4 per unit) despite a	Noted.	The capacity study for this site has been redesigned to include blue	

		Development Sites		PTAL of 4 which should mean that the site is car free		badge only car parking.	
201	LBL Planning Officer	5 Potential Development Sites	Ravensbourne Retail Park –	Part of the site is missing from the aerial photo of the Ravensbourne retail park		The whole site is now shown in the aerial photo of the site.	C
202	Avison Young/ Barratt London and The Church Commissioners	5 Potential Development Sites	Rushey Green and Catford Character Area	<p><i>Rushey Green and Catford Character Area</i></p> <p>Within the Draft Framework, the Site is located within the 'Area 3 (Rushey Green and Catford) Character Area'. Accompanying imagery within the Draft Framework correctly identifies that the Site is within the adopted Catford Town Centre Framework (CTCF) adopted earlier in 2021. It is therefore indicated that the CTCF should be referred to in relation to the Site (and future redevelopment proposals there).</p> <p>We broadly support this approach, given that the CTCF comprises the key planning guidance document which will guide regeneration at the Site (and other relevant regeneration sites within Catford Town Centre)</p>	Agreed	<p>Text added on page 4 The Study Area:</p> <p><i>Lewisham town centre – within this area the Lewisham Town Centre Local Plan DPD remains the primary planning guidance document..</i></p> <p><i>Catford Town Centre – within the town centre the CTCF remains the primary planning guidance document.</i></p> <p><i>The A21 Development</i></p>	C

			<p>To emphasis this point further, however, we request that the Draft A21 Framework be updated to specifically state that <i>“the CTCF remains the primary planning guidance document concerning the Site (and others within the CTCF area) in terms of identifying key development parameters such as land use, building heights, design quality and public realm”</i>.</p> <p>We consider that the above should be outlined explicitly, to ensure that the relationship between the CTCF and Draft A21 Framework documents (and how these overlap in relation to the relevant sites already covered within the CTCF) is fully understood.</p>		<p><i>Framework does not provide comprehensive guidance for areas within the A21 Development Framework that overlap with the study areas for the Lewisham Town Centre Local Plan and the Catford Town Centre Framework.</i></p> <p><i>University Hospital Lewisham and the Lewisham Shopping Centre are excluded from the scope of this study.</i></p> <p>The following text has been added to the Rushey Green and Catford Character area:</p> <p><i>The CTCF remains the primary planning guidance</i></p>	
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						<i>document concerning sites within the CTCF in terms of identifying key development parameters such as land use, building heights, design quality and public realm”.</i>	
203	Historic England	5 Potential development sites	Rushey Green and Catford Character Area Site 9	We note that under both options, the proposed maximum building height on this site (12 or 13 storeys) is well above that identified as the prevailing heights for the area on page 20 (2-7 storeys). While we appreciate the logic behind retaining the existing height in order to maximise site capacity, we would suggest that this is not the optimal solution given the visual impacts and the fact the existing Capital House is out of scale with its immediate surroundings. We consider that simply replacing an inappropriately sited tall building with a similarly tall building would be contrary to NPPF para 130, and given the nature of the site that alternative methods of delivering higher density development may well be possible and should be investigated.	The A21 Corridor has a number of taller elements along its length and the Framework seeks to optimise site capacities within this key opportunity corridor. It is unrealistic to think that redevelopment of the site would take place at a lower scale than is existing.	No change	NC

204	LBL Planning Officer	5 Potenti al Develo pment Sites	Site 18 - McDonalds Ashgrove Road	Recommend Site 18 – McDonalds Ashgrove Road is removed as it does not have the potential to deliver a large number of homes and currently a commercially successful restaurant business is located on the site.	Noted.	Site has been removed.	C
205	N/A	5 Potenti al Develo pment Sites	Site 3 Slaithwaite Car Park	<p>The proposed development for the Slaithwaite Road car park includes a six-storey block of flats. This is too tall for a residential area. The plan states “taller building where impact on neighbouring properties is minimised”. However, a six-storey block of flats on that site <u>will</u> impact neighbouring properties – it will overlook a number of neighbouring properties, will block light to neighbouring properties, and will look far too tall for a residential street, sticking out like a sore thumb compared to the neighbouring Victorian housing.</p> <p>The justification for a six-storey block of flats proposed in the plan is “max height 6 storeys as per consented hotel on high street”. This should not be followed. A six-storey building on a high street should <u>not</u> mean that a six-storey building can be built on a neighbouring residential street. If it did, it would allow for over-sized</p>	<p>The taller element of the site, up to 6 storeys is on the corner of Clipper Way and Slaithwaite Road and is adjacent to the consented 6 storey hotel block as indicated and across from an existing 4 storey flatted block.</p> <p>London plan policy GG2 Making the best use of land recognises the shortage of land across London and the challenge to solve the capital's housing crisis. It directs that development must optimise development capacity.</p> <p>We appreciate that any development proposed</p>	No change	NC

				<p>developments to creep their way into residential streets purely because of consent for tall developments on a high street. Consent for a tall building on a commercial high street cannot mean consent for a tall building on the adjacent residential street.</p> <p>If there must be development on that site, it should not go higher than the neighbouring houses on Slaithwaite Road.</p> <p>On a more general note, given the huge volume of new flats being built five minutes away from the site (the development on the A20 near Lewisham Station), it seems to me that the local area would benefit more if a park was built on the Slaithwaite Road site, not yet more flats in an area of exceptionally high population density.</p>	<p>on this site will have an impact on neighbouring properties however the corner is of sufficient distance and of an orientation that daylight issues or overshadowing of existing dwellings should not be an issue.</p> <p>The site is a short walk from Gilmore Road Triangle, The River Ravensbourne and Ladywell Fields.</p>		
206	London Borough of Lewisham	5 Potential Development sites	Site 5 and other potential development sites with significant existing trees.	<p>Why only retain trees on Albion Way? Other side has mature trees too on Clarendon Rise. Also in general it should be required that existing trees are retained in some sites it only says retain if possible which is not strong enough</p>	Agreed	<p>Text changed to <i>existing trees should be retained.</i></p> <p>The above text has also been added to all sites with significant trees.</p>	C

207	Phoenix Community Housing	5 Overarching guidance	Social infrastructure	PCH has consulted with a number of its current residents in the preparation of these representations and shares their pleas for more social infrastructure such as access to GPs and support for appropriate retail provision to accompany the inevitable increase in the number of homes and intensification of the area. They are concerned that any intensification considers and benefits the existing community.	Noted.	The A21 Development Framework does not include an assessment of future social infrastructure needs. This information is provided in the Infrastructure Delivery Plan that is informed by the Local Plan. The Council works with key infrastructure providers to prepare the Infrastructure Delivery Plan.	C
208	Lewisham Cyclists	6 Appendix	Emerging Cycle Strategy	As we're sure Lewisham Council, TfL and Framework Planners are aware, Lewisham Cyclists strongly believes the A21 (and connecting roads) in their entirety (i.e. from Downham to Cycleway 4 in Deptford) is an ideal location for a fully protected permanent cycle track. We know TfL have previously done considerable work and produced a draft Outcome Definition Report to explore the potential of this route. We would very	Work on the Outcome Definition Study by TfL was paused due to the impact of the response to the COVID pandemic on TfL resourcing. The Council will continue to work with TfL to promote the project.	No change	NC

				much welcome the opportunity to review this study and feedback to Framework Consultants, Lewisham Council and TfL on how the long-term solution could be further developed.			
209	Catford Active Travel	6 Appendix	Emerging transport strategy Cycleway	We support the construction of a cycleway along the A21 by reallocating road space from private motor vehicles. We support the roll out of Low Traffic Neighbourhoods along this corridor so residential streets are not used as rat runs between the A21 and other major roads (South Circular). We welcome the installation of cycle hubs in the stations to enable multi-modal sustainable trips.	Noted	No change	NC
210	Catford Active Travel	6 Appendix	Emerging transport strategy Cycleway	Although the plans are not fully developed yet we would like to see a further integration with other critical infrastructure in the borough: <ul style="list-style-type: none"> • The A21 should link to the under-construction Cycleway 4 to enable active travel to central London and Greenwich/ Woolwich via Deptford Church Street and/or Lewisham High Street / Lewisham Road. • The junction with the to-be-realigned South Circular should follow the Department for Transport LTN 1/20 guidance to enable a safe connection with this 	The A21 Development Framework will sit alongside the Catford Town Centre Framework and other projects and strategies being developed for the borough. The Council will ensure that transport projects are coordinated with TfL and other key stakeholders to ensure they are fully integrated.	No change	NC

				<p>important East – West corridor. A cycling route along Catford Bridge is part of the Catford Centre masterplan and these routes should be linked together.</p> <ul style="list-style-type: none"> • There is an opportunity to enable additional pedestrian and cycling crossings along the A21, e.g. at Mount Pleasant Rd that would make the London Cycling Network route 65 safer. 			
211	Catford Active Travel	6 Appendix	Emerging transport strategy S106 funding	<p>Catford Active Travel would like to see a portion of the s106 funding to be earmarked for active travel projects. This is to enable the council to meet its goals for modal shift away from motor traffic and its commitment to net-zero, being transport one of the key contributors to emissions.</p>	<p>The Council has already drawn significant sums of S106 from developers for Active Travel and will continue to do so through the planning process. We hope that the A21 Development Framework which will feed into site allocation requirements in the new Local Plan will make this more transparent.</p>	No change	NC
212	Catford Active Travel	6 Appendix	Emerging transport strategy	<p>We would like the council to take a lead role in the development of the active travel strategy working closely together with Transport for London instead of being delegated to developers.</p>	Noted	No change	NC

				The infrastructure should not be built in a piecemeal and disjoint way, instead it needs to be direct and cohesive as part of a wider network.			
213	Catford Active Travel	6 Appendix	Emerging transport strategy	To conclude, we support the emerging Transport Strategy that is part of the framework, we believe it shows the potential of high-quality infrastructure being built in this corridor and we call upon the council to take the necessary steps to make it a reality.	Noted	No change	NC
214	LBL Planning Officer	6 Appendix	Emerging Transport Strategy	It is not necessary to include the words “Extracts from the transport strategy” in the titles of each page as the word emerging implies that the transport strategy is incomplete.	Noted.	The words “Extracts from the transport strategy” have been removed from every page.	C
215	LBL Planning Officer	6 Appendix	Emerging Transport Strategy	The following text requires correcting: The emerging strategy has been developed with regard to TFLs Healthy Streets Approach (reference guidance) and all new development will be expected to demonstrate how they have considered and applied the London Plan Healthy Streets Approach and Toolkit Indicators	Noted.	The below text has been changed as follows <i>The emerging strategy has been developed with regard to TfLs ‘Healthy Streets for London’ approach (and all new development will be expected to demonstrate how they have considered and</i>	C

						<i>applied the London Plan Healthy Streets Approach and Toolkit Indicators.</i>	
216	Lewisham Cyclists	6 Appendix	Emerging Transport Strategy	We support the construction of fully protected cycleways along the A21 by reallocating road space from private motor vehicles and provide further detail of what we would expect the framework to consider at future stages. We support the roll out of Low Traffic Neighbourhoods along this corridor so residential streets are not used as rat runs between major roads (e.g. A21 to A205 South Circular) and welcome the installation of cycle hubs in railway stations to enable multi-modal sustainable trips.	Noted	No change	NC
217	Lewisham Cyclists	6 Appendix	Emerging Transport Strategy	Although the plans are not fully developed yet we would like to see a further integration with other critical infrastructure in the borough: <ul style="list-style-type: none"> • The A21 should connect to Central London via the under-construction Cycleway 4, via Deptford Church Street and/or Lewisham High Street / Lewisham • Road. We would expect all cycling infrastructure proposed to meet LTN 1/20 and London Cycle Design 	The Council has already drawn significant sums of S106 from developers for Active Travel and will continue to do so through the planning process. We hope that the A21 Development Framework which will feed into site allocation	No change	NC

				<p>Standards, which should also be designed to meet future increases in people choosing active travel.</p> <ul style="list-style-type: none"> • The junction with the to-be-realigned South Circular should follow the Department for Transport LTN 1/20 guidance to enable a safe connection with this important East - West corridor. A cycling route along Catford Bridge is part of the Catford Centre masterplan and these routes should be linked together. • There is an opportunity to enable additional pedestrian and cycling crossings along the A21, e.g. at Mount Pleasant Rd that would make the London Cycling Network route 65 safer. • The emerging transport strategy fails to identify opportunities for further East-West connectivity to the south in Whitefoot (at the junction of Southend Lane and Whitefoot Lane) and at the junction of Downham Way. The framework should also include guidance for Developments at both junctions to include provision for protected cycle lanes connecting Sydenham, Whitefoot, Downham and Grove Park to the A21 corridor by active travel. 	<p>requirements in the new Local Plan will make this more transparent.</p>		
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218	Lewisham Pedestrians	6 Appendix	Emerging Transport Strategy	<p>The Emerging Transport Strategy indicates that the Framework only nods at this significant issue. On p.157 the A21 is described as “gradually severing” communities and also that currently it causes “moderate pedestrian severance”.</p> <p>The draft Framework fails to fully address this severance and yet this severance is both critical to those who already live close to the A21 – but more importantly to the Framework– it will make newcomers feel unable to access the very closest facilities.</p>	Noted	<p>Text strengthened on page 157 to recognise the significant severance caused by the A21.</p> <p><i>The A21 causes significant severance between the east and west sides of the street due to the width of the road and the high volume of traffic using it.</i></p>	C
219	London and Quadrant Housing Trust	6 Appendix	Emerging transport strategy	<p>We support the emerging transport strategy which improves transport facilities along the A21. L&Q welcomes the council’s aspirations to deliver sustainable transport connections between areas in the corridor as well as other parts of the Borough to help reduce private car use, traffic and congestion.</p> <p>Access to sustainable transport will help to justify reduced parking need for new residential developments in areas with high PTAL which could enable space to be given over to homes or landscaping instead. However, some parts of the Borough</p>	Development along the corridor will be required to meet London Plan policies for vehicular parking and cycle parking.	No change	NC

				<p>are not well connected by public transport and where this is the case, there needs to be flexibility to continue to provide car parking.</p> <p>Cycle parking provision is supported, and the reinforcement of the existing cycle route is welcomed to support the activation of frontages. Although, we would highlight the challenges of meeting the cycle standards proposed within the London Cycle Design Standards. This is to ensure there is flexibility to meet the demand for activating frontages on the Ground floor spaces and that they are appropriately met</p> <p>The provision of car clubs is supported as they will reduce the need for private ownership in places with less accessibility to public transport.</p>			
220	N/A	6 Appendix	Emerging transport strategy	Be more consistent about speed limits and bus lane access times. More emphasis on keeping cars/ bikes/ buses/ people apart with low level physical barriers - bikes and pedestrians do not easily mix.	Further detail on an emerging transport strategy will be produced when the transport strategy is progressed further.	-	NC
221	N/A	6 Appendix	Emerging transport strategy	Need to add emphasise that the A21 serves a wider community than Lewisham and smooth traffic flow is necessary if "rat runs" through	The balance between the routes Movement function and place function is discussed	Paragraph added to Introduction and Vision – Add after 1.1 centres...	C

				residential streets are to be avoided. The traffic flow/traffic lights around Lewisham \gateway need urgent attention in order to reduce pollution.	throughout the document and is now emphasised further.	<i>The A21 forms part of the Transport for London Road Network (TLRN) and as such TfL is the landowner, highway, traffic, signalling and public transport planning authority for the corridor. It has important role in the flow of vehicles through Lewisham and for London overall.</i>	
222	N/A	6 Appendix	Emerging transport strategy	A good start but more needs to be done to discourage driving - this means massively reducing car parking and having proper enforcement for those who idle or park illegally or on pavements. Roads should be narrowed and parking bays only allowed for disabled and loading. The draft needs much stronger commitment and action, people won't start to take sustainable transport until driving is a less feasible/more hassled option.	The Framework is high level planning document and as such cannot go into the details on enforcement etc. The document is intended as a starting point for further projects and initiatives to spring board from.	No change	NC
223	N/A	6 Appendix	Emerging transport strategy	I like it. We need more cycle provision along the A21. I use the northern end of it as a commuting route.	Noted	No change	S + NC

				Segregated cycle lanes would be the best plan. We are in a climate emergency and need to prioritise zero/low carbon transport like cycling and buses			
224	Phoenix Community Housing	6 Appendix Emerging transport strategy	Emerging Transport strategy	Transport improvements and particularly road crossings, pedestrian safety, cycle lanes and increased bus services are welcomed, though there is concern that this will not materialise in the short-medium term and, crucially, not before the new homes arrive. Phoenix supports the emerging transport strategy particularly moves being considered to slow down the traffic on A21 by reducing capacity to a single carriageway and improving cycling and pedestrian routes.	Noted. As development comes forward along the A21 the Council will ensure that financial contributions for improvements are collected. We will continue to work with TfL to promote the A21 project and secure transport improvement projects for the corridor.	No change	S + stanNC
225	TfL	6 Appendix	Emerging Transport Strategy	We also want to ensure that the operational use of Catford bus garage is not adversely affected by development or transport proposals. The bus garage will remain in operational use and is expected to be upgraded to incorporate charging for electric buses in due course. It would be helpful if this could be clarified in the document. Any adjacent sites should apply the 'agent of change' principle that they will need to	Noted.	The following paragraph has been added to the introduction of the Emerging Transport Strategy: <i>Catford Bus Garage that lies within the Bellingham Character Area</i>	

				<p>The 'agent of change' principle will also apply to any sites close to operational rail land or required for sites required for the BLE project.</p>	<p>Noted.</p>	<p><i>Framework will remain in operational use and is expected to be upgraded to incorporate charging for electric buses in due course. Any adjacent sites to the Catford Bus Garage should apply the 'agent of change' principle and mitigate against any noise, vibration or air quality impacts from the bus garage.</i></p> <p>The following paragraph has been added to the Overarching Guidance: Architectural Character Section</p> <p><i>Potential Bakerloo Line Extension: Part of the northern part of</i></p>	
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						<i>the study area around Molesworth Street includes safeguarded sub-surface interest (tunnels). The 'agent of change' principle will apply to these sites.</i>	
226	London and Quadrant Housing Trust	6 Appendix	Good practice example	The council's good practice examples that support and maximise housing delivery, character, air quality, local infrastructure and employment are welcomed.	Noted	No change	NC
227	N/A	6 Appendix	Good practice examples	Please consider changing the photo and precedent (assuming typo and should be tree lighting not three lighting) because it is not good practice to light trees from an ecological point of view. Evidence suggests that lighting trees not just disturbs nocturnal species but it has a negative impact on the trees themselves and reduces their life expectancy. So we should NOT encourage this practice.	Agreed	Photo changed on page 164	
228	N/A	6 Appendix	Good practice examples	The 'promote sustainable transport' is very weak and needs to be strengthened. There's not enough outlined to discourage driving, only adding minor improvements to cycling	The Framework is high level planning documents and as such cannot go into the	No change	NC

				and walking. This almost feels like tinkering around the edges that will have very little impact. We need real changes that deliver positive and green behavioural change. I feel many of these minor suggestions for improvements will end up being rejected by a small but vocal and hostile minority who opposed the LTN's and have formed driving lobby groups and communities that are spreading misinformation on social sites.	details on enforcement etc. The document is intended as a starting point for further projects and initiatives to spring board from.		
229	N/A	6 Appendix	Good practice examples	Promoting sustainable transport and cycle lanes, more walking is an excellent idea	Noted	No change	S + NC
230	Woodland Trust	6 Appendix	Good practice examples	We commend the guidance given in the Trust's publication Residential Developments & Trees, which draws on the expertise of the Tree Design Advisory Group (TDAG). https://www.woodlandtrust.org.uk/publications/2019/01/residential-developments-and-trees/	Addressed above		NC
231	LBL Planning Officer	6 Appendix	Graphics Emerging Transport Strategy	The graphics are difficult to read due to their small size.	Noted.	The sizes of the graphics have now been increased so that they are legible.	C

232	Quaggy Waterways Action Group (QWAG)	6 Appendix Good practice examples	River Ravensbourne	<p>Page 165</p> <p>It is notable that the good practice examples provided (which is the most the document states about green infrastructure, sustainable urban drainage, etc), do not draw on examples within the Ravensbourne Catchment, and do not refer to the need to restore the river if its condition is to be improved:</p> <p>BUILDING ON NATURAL ASSETS</p> <p>How to deliver this principle:</p> <ul style="list-style-type: none"> - Incorporate SUDS and green infrastructure linking to larger green spaces around A21 - Embed social value outcomes into future development ambitions to encourage inclusive growth incorporating greening, tree planting and play parks - Provide resting amenity space with green pocket parks near the High Road to address <p>Key locations implement: Ladywell Fields, Lewisham Park, Foster Memorial Park, Downham Playing Fields, Ravensbourne River towpaths</p> <p>Precedent: Dublin's 'Wilding' policy applied in St Anne's Park</p> <p>Application: allowing wildflowers and weeds to flourish on roadside verges, open spaces, in parks and cemeteries</p>	Agreed	An example of River Restoration in Cornmill Gardens in Lewisham Town Centre has been included in the document which is relevant to the A21 Study Area as they both share an urban context.	C
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The section on UTILISING RIVERFRONT reinforces the sense that the framework is about visual amenity not about river restoration and ecologically informed action:
 How to deliver this principle:
 - Public realm improvements introducing new landscaping and better accessibility
 - Facilities providing leisure activity, amenity, and workspace to activate the riverside
 - New pedestrian and cycle bridges to increase permeability and access to key green spaces
 - New employment uses that address the riverfront in a positive way
 Key locations implement:
 Ravensbourne River
 Precedent: Ljubljana riverbanks
 Application: unlocking walking, cycling, dwell and social space opportunities

Local precedents could be:

- Creekside, which was proposed to be barraged for visual amenity when new residents complained about mud. Fortunately, biodiversity too priority and the Framework should follow suit.

				- Inspired by QWAG's work to secure proper river restorations within the Ravensboune Catchment such as at Chinbrook Meadows and at Sutcliffe Park, the QUERCUS project was led by Lewisham Council and the toolkit was even produced on a flash drive - see ERCIP https://urbact.eu/chapman			
233	London Borough of Lewisham	6 Appendix ix	Typo Pg. 159	Molesworthy road	Noted	Corrected typo on page 159	C

Table 2: Avison Young representing an individual - all comments

Avison Young representing an individual	6 Appendix	Emerging Transport Strategy	Transport Strategy: Our client is aware of the work currently being undertaken by the Council and has reviewed the extracts taken from the draft Transport Strategy. The Strategy has not been made available in its entirety and our client subsequently reserves the right to make further comments on the Strategy as a whole following its publication as part of the A21 Development Framework evidence base.
Avison Young representing an individual	1 Introduction and Vision	Land at Randlesdown Road site Bellingham	<p><i>Vision and Guiding Principles</i></p> <p>We are broadly supportive of the vision and guiding principles of the Framework, noting that its core purpose is to maximise the delivery of new homes along the corridor to meet the Borough’s shortfall. We agree with the conclusions drawn in respect of the southern area of the Framework, notably, that there is an opportunity, through the Framework, to identify area for intensification and regeneration. We further support the Framework’s conclusions that there is untapped development potential, specifically that Bellingham is identified as an area of active regeneration. The allocation of Site 13 for the co-location of commercial and residential uses would go some way in achieving these objectives and would strengthen the existing character of Bellingham in a way that is appropriate both to its context and the housing needs of the borough. It would achieve the optimisation of the site and enhance the local character, in line with the project opportunities identified in the Vision.</p> <p>For Bellingham, the spatial opportunities identified for new development are for a proposed Local Centre that has an opportunity to turn big box retail into an intensified place to work, live and experience the river. In our comments, we seek to demonstrate how Site 13 specifically responds to all three of these opportunities.</p> <p>We support the Framework’s conclusions around the development potential of Bellingham, noting it is earmarked as having the “most development potential”, together with the principles of the spatial opportunities: <i>“Inter alia, the A21 corridor will not be brought forward as a single comprehensive redevelopment project. Rather sites are identified within this document for moderate infill intensification and larger massing on sites where local impacts are minimal.”</i> However, we would note that it likely that the</p>

			majority of local impacts associated with the sites detailed in the document will be tested during the pre-application and planning application process. We would therefore recommend that where proposed densities and massing are referenced and / or suggested within the Framework, that this is highlighted as indicative. Overall, the <i>“Vision and Guiding Principles”</i> are very positive, and we are of the view that the redevelopment of the Land at Randlesdown Road could go some way in helping to achieve these objectives. For the reasons we set out below, we maintain the density of the proposed development could be increased, together with its height, scale and massing (building on that which is currently demonstrated in the massing study at Figure 3, Page 128). In conjunction with providing residential and commercial uses, the positive redevelopment of the site provides an opportunity to secure an attractive approach to Bellingham Station.
Avison Young representing an individual	6 Appendix	Emerging Transport Strategy Highways Work Randlesdown site	The emerging Transport Strategy comprises initial suggestions to enhance transport facilities along the A21 to improve sustainable travel. Extracts from the Strategy are provided as an 6 Appendix to the Framework. The Strategy itself has not been made available to view as part of the evidence base. This should be made available to ensure the Framework is justified, taking account of the available evidence, and positively prepared. At this time, our client notes the proposals for Bellingham, specifically in relation to the narrowing of the carriageway to slow vehicular traffic down with key build outs. We understand additional tree planting is proposed within the public realm directly adjacent to our client’s site. We reserve the right to make further comments in relation to the proposed highways works when the relevant evidence base documents are able to review.
Avison Young representing an individual	2 Overarching guidance	Land at Randlesdown Road site Bellingham	Overarching Guidance We are broadly supportive of proposed areas of ‘Overarching Guidance’ and the proposed strategies detailed within this section of the Framework, specifically Paragraph 2.9 which state that <i>“Heights for specific sites will be subject to further testing through the pre-application process which may determine that lower or taller development than the indicative thresholds is appropriate”</i> . This is reflective of the objectives detailed in both the London Plan and the emerging Local Plan and should be reiterated within the specific-site assessment sections of the Framework.
Avison Young representing an individual	2 Overarching Guidance Building Heights	Land at Randlesdown Road site Bellingham	In addition, we are supportive of the Framework’s context-based height strategy including <i>“corner sites”</i> , which <i>“are generally an opportunity for increased height, providing they take into consideration privacy and overshadowing issues.”</i> Site 13 is located on the junction where Randlesdown Road meets the A21 (Bromley Road). It is a well-positioned corner location which has the opportunity to deliver a landmark scheme visible on approach to the station. It is located adjacent to the River Ravensbourne, Catford Bus Station, and a parade of shops which are typically considered to be less sensitive neighbours (to those such as residential uses) in considering daylight / sunlight impacts and so reflect the sites <i>“less sensitive nature”</i> .

Avison Young representing an individual	2 Overarching Guidance		<p><i>Summary</i></p> <p>Whilst we are in broad support of the 'Overarching Guidance', we are of the view that the Area-Based Strategy associated with Building Heights should be updated to reflect the results of the draft Tall Building Study (2020), which concludes Bellingham has medium to high suitability for tall buildings. Furthermore, we are of the view that Paragraph 2.9 should be emphasised throughout the site-specific assessments contained within the Framework, specifically that building heights will be <i>“subject to further testing through the pre-application process which may determine that lower or taller development that the indicative thresholds is appropriate.”</i></p>
Avison Young representing an individual	3 Character Area Framework	Bellingham	<p>Character Area Framework</p> <p>We are supportive of the Character Area Framework for Bellingham and the objectives associated with its regeneration, including as <i>“an employment and mixed use-led area of intensification with greater accessibility to the Ravensbourne.”</i></p>
Avison Young representing an individual	3 Character Area Framework	Bellingham	<p>Paragraph 3.24 sets out the existing area character, specifically that the Ravensbourne River is diverted into a concrete channel to the north of the development site; that traffic and pedestrian flows are lower further north at Culverley Green, but poor-quality post-war interventions and forecourt parking detract from the local character; poorly maintained retail frontages and industrial areas are located to the south.</p>
Avison Young representing an individual	3 Character Area Framework	Bellingham	<p>The site presents an opportunity to overcome a number of these matters, specifically those relating to providing connections to the river and enhance the existing retail frontages. Its redevelopment would support improvements to this character area, specifically by providing an improved link to the station along Randlesdown Road.</p>
Avison Young representing an individual	3 Character Area Framework	Bellingham Character Area Framework Strategic Aims	<p>Page 47 of the Framework identifies the strategic aims for the sites along and close to the A21 in the Bellingham Character Area. We have assessed Site 13 against each of these overarching proposals in Table 1, below.</p> <p>This matter is discussed in more detail within the following section of this report.</p>
Avison Young representing an individual	3 Character Area Framework	Bellingham Character Area Framework Strategic Aims	<p>Area currently deficit in access to open space new developments must make this a priority:</p> <p>The proposed development will provide amenity space for future residents in line with the requirements of both the London Plan (2021) and Local Plan.</p> <p>We are of the view that due to the sites characteristics it does not lend itself to the provision of publicly accessible open space.</p>

Avison Young representing an individual	3 Character Area Framework	Bellingham Character Area Framework Strategic Aims	<p>Opportunities to open up sections of the river through mixed-use development:</p> <p>Our client will explore opportunities to enhance the river in this location as part of the future landscaping strategy associated with the sites redevelopment. These opportunities will therefore form part of the design-led process associated with the preparation of a future planning application.</p>
Avison Young representing an individual	3 Character Area Framework	Bellingham Character Area Framework Strategic Aims	<p>Re-provision of commercial and employment space to retain local jobs and strengthen local facilities:</p> <p>The redevelopment of the site would support the re-provision of existing poor quality commercial space, resulting in a better quality of employment stock which will strengthen the local economy and retain jobs within the Borough. The re-provision of existing stock as part of the redevelopment may result in new businesses being attracted to the Borough.</p>
Avison Young representing an individual	3 Character Area Framework	Bellingham Character Area Framework Strategic Aims	<p>New development of 3-6 storey height based along the A21 based on the context:</p> <p>The Character Area Framework for Bellingham identifies the site as a potential development site suitable for a taller building.</p> <p>As we demonstrated through these representations, we are confident that tall buildings (of 30m or more), and taller building (of 6 storeys or more) would be suitable in this location.</p>
Avison Young representing an individual	3 Character Area Framework	Bellingham Character Area Development	<p>We are supportive of Page 47, which sets out the Bellingham Character Area Development potential. Within this, Site 13 is identified for mixed use and employment led development.</p> <p>We are of the view that the sites redevelopment would:</p> <ul style="list-style-type: none"> • Provide new mixed-use frontages, by virtue of the support for Class E and F uses at ground floor(site-specific assessment); • Support tall and taller buildings, acting as a wayfinder for the approach to Bellingham railway station; • Make the River Ravensbourne and other natural assets more accessible as part of a design-led landscaping strategy; and • Intensify the employment offer in this location as a result of the co-location of uses, in line with London Plan Policy E7. <p>Not only would the sites redevelopment support the Character Area specific opportunities, it would also support the wider objectives of the A21 Development Framework, including</p>

			maximising the delivery of homes to meet the borough's shortfall; intensifying low employment densities; creative an attractive and active area of regeneration on approach to the station; enhance Bellingham's local distinctiveness and we are wholly supportive of this.
Avison Young representing an individual	3 Character Area Framework	Characterisation Study Bellingham	<p>In addition to the above, we have also reviewed the Council's Characterisation Study (2019) which provides an assessment pattern of the Borough and underpins the Character Area Framework set out in the draft A21 development Framework.</p> <p>A number of key issues associated with Bellingham are identified. Those of most relevance to our site include:</p> <ul style="list-style-type: none"> • The neighbourhood comprises a large proportion of single use buildings i.e. primarily residential. • There is a lack of social facilities and employment spaces which mean residents have to travel. • Low population density which result in insufficient critical mass to support public transport and shops. <p>We are of the view that this section of the A21 Development Framework directly responds to the opportunities identified within the Characterisation Study, specifically in relation to the intensification and redevelopment of our site, and the site as a whole provides a unique opportunity to enhance this stretch of the A21 and Randlesdown Road through its redevelopment and regeneration. This further supporting the objectives set out in the Character Area Framework, together with the wider aspirations of the Framework (as set out above).</p> <p>We are therefore supportive of the Character Area Framework assessment relating to Bellingham and the subsequent objectives that have been prepared for future development coming forward.</p>
Avison Young representing an individual	4 Typological guidance	Land at Randlesdown Road site Bellingham	<p>Our client is broadly supportive of the Typological Guidance provided for sites which are not currently allocated but which may come forward beyond the Plan period.</p> <p>We would recommend the guidance is, however, updated to recognise that each "scale of intervention" should come forward as part of a design-led approach, as per the London Plan (Policy D3).</p> <p>We would also recommend it is made clear that the supporting figures under each typological guidance and scale of intervention are examples only and that this would not preclude greater scales of intervention coming forward on those sites.</p> <p>In addition to the above, we are of the view that the figure shown on Page 67 should make clear that the land to the south of Bellingham Trading Estate is indeed Site 13 and is subject to assessment within the "Potential Development Sites" section of the Framework.</p>

Avison Young representing an individual	5 Potential Development Sites	Land at Randlesdown Road site Bellingham	<p>These representations are made on behalf of our client, in relation to the A21 Development Framework consultation being undertaken by the London Borough of Lewisham (LBL) (14th October – 12th November 2021).</p> <p>The A21 Development Framework (“the Framework”) will set the vision, objectives and development strategy for individual sites and the wider A21 corridor. A key purpose of the framework is to identify where and how additional housing could be delivered along the corridor. It tests the capacity of the proposed development sites within the study area for nonresidential and residential uses, with the aim of optimising their development potential.</p> <p>The consultation material includes the A21 Development Framework only. We note that A21 Baseline Appraisal does not form part of the consultation material, however, where relevant we have provided comment on its content and conclusions.</p>
Avison Young representing an individual	5 Potential Development Sites	Land at Randlesdown Road site Bellingham	<p>Overview</p> <p>The land at Randlesdown Road is referred to as ‘Site 13’ and is identified for mixed-use development including Class E and F uses at ground floor and residential uses at upper floors.</p> <p>The allocation introduces the co-location of residential uses at the site and includes 62 residential units, equating to a density of 155 units / hectare.</p> <p>The landowner is pleased to see their site has been allocated for the proposed mixed-use development by the Council, particularly the co-location of residential uses in this location. The landowner would, however, like to take the opportunity to comment on a number of matters associated with the Framework itself, prior to the document progressing to adoption.</p>
Avison Young representing an individual	5 Potential Development Sites	Land at Randlesdown Road site Bellingham	<p>Land Use: Our client is supportive of the proposed mix of uses, in particular the proposed residential. Clarity is sought over the quantum of the proposed non-residential floorspace capacity and further detail is required confirming how the Council have concluded 725 sqm is an appropriate level of re-provision. The precise location and quantum of the proposed non-residential uses should be tested, with due reference to the specifics of co-locating employment and residential uses, through an iterative design process at the pre-application and application stage.</p>
Avison Young representing an individual	5 Potential Development Sites	Land at Randlesdown Road site Bellingham	<p>Quantum and density of development: Whilst our client is fully supportive of the principle of residential uses, they have identified through previous representations made in respect of Lewisham’s Regulation 18 Local Plan (dated 9th April 2021) that Site 13 is subject to viability complexities and cannot be redeveloped solely for commercial purposes. Such complexities should also be borne in mind when considering the residential capacity of any forthcoming scheme to ensure it is deliverable.</p>

			<p>In addition to this, we have reviewed the Site Allocations Background Paper (2021) methodology, the Council’s Residential Density Technical Paper (2020), together with surrounding consented schemes including 335-337 Bromley Road. This review supports our conclusions that a higher indicative density should be the starting point for testing Site 13’s development capacity. We would welcome the opportunity to further discuss this approach through the pre-application process with LBL.</p>
Avison Young representing an individual	5 Potential Development Sites	Land at Randlesdown Road site Bellingham	<p>Height, scale and massing: Lewisham’s Regulation 18 version of the Local Plan defines tall buildings at Policy QD4: <i>“Within Lewisham tall buildings are defined as buildings that cause a significant change to the skyline and which are 30m or more in height, inter alia; or are significantly taller than the prevailing height of buildings in the immediate and surrounding area.”</i>. Taller buildings are defined at Paragraph 5.29 as being those that project above the prevailing heights of buildings and structures within a sites immediate and surrounding area. Figure 5.1 of the Regulation 18 Local Plan indicates locations across where tall buildings are considered acceptable. This reflects the evidence presented in the draft Tall Building Study (2021). Bellingham is identified as being of medium – high suitability for supporting tall buildings and as part of a Growth Area.</p> <p>Further support for tall and taller buildings is provided in the A21 Development Framework, specifically at sites which front onto the A21 and those which form a corner plot. Site 13 is identified as a location for taller development within the Character Area Framework: Bellingham (Section 2.5, Page 47). The proposed massing detailed in Figure 3 of the site-specific capacity study (Page 128 of the Framework document) associated with the Site 13 indicates a maximum storey height of 6 dwellings, stepping to 4 storeys along the A21, before dropping down to a further 1 storey to the rear of the site. This is not reflective of the Council’s evidence base and should be updated accordingly. Furthermore, we have assessed the site in the context of London Plan Policy D9 and emerging Local Plan Policy QD4 and conclude that tall and taller buildings in this location would not cause harm to any local and strategic designations, the existing character of the area, or neighbouring uses. In line with Paragraph 2.9 of the Framework document, a tall building can be tested as part of the pre-application process, however, we are of the view that, in principle, a tall building at Site 13 can respond to the area-based strategies and broader guidance detailed in the A21 Development Framework, as a whole.</p>
Avison Young representing an individual	5 Potential Development Sites	Land at Randlesdown Road site Bellingham	<p>Layout and open space: The Council’s Open Space Assessment confirms that Bellingham has ‘fair’ access to greenspace and is not deficient in accessing metropolitan and district parks, together with SINCS. We conclude that there is no policy requirement set out in either the strategic or local emerging planning framework for new development to provide open space or amenity space within the proposed development.</p>

			Furthermore, we are of the view that Site 13 does not lend itself to creating good, functional areas of publicly accessible open space due to its characteristics.
Avison Young representing an individual	5 Potential Development Sites	Land at Randlesdown Road site Bellingham	Compliance with the adopted Development Plan: We are supportive of the identification of Site 13 for the co-location of residential and commercial uses, in line with London Plan Policy E7 and would expect the Regulation 19 version of Lewisham’s Local Plan to reflect the conclusions of the A21 Development Framework Assessment. We would therefore expect to see the policy wording associated with the then draft Policy Allocation 25 to take account of co-locating uses, together with the matters raised in these representations and relating to land uses, density, tall buildings, and open space.
Avison Young representing an individual	5 Potential Development Sites	Land at Randlesdown Road site Bellingham	<p>Previous Representations</p> <p>On behalf of the landowner, has made previous representations in respect of the Council’s Regulation 18 Local Plan Consultation: <i>“Main Issues and Preferred Approach to Proposed Changes to the Adopted Policy Map”</i> (April 2021). The site forms a draft allocation (Allocation 25) within the Regulation 18 Plan for commercial and industrial uses only.</p> <p>The representations made presented the case for co-locating residential uses with employment generating uses at the site. We explained why the site could not be redeveloped for solely commercial uses. This was a principle that was tested at appeal (APP/C5690/A/13/219235 and APP/C5690/A/14/2223342) and highlighted the site-specific conditions and complexities of the site, including its remediation. We previously concluded that the site was highly unlikely to come forward for solely employment uses. Therefore, to ensure the delivery of the site, additional higher value uses would need to be considered, including Class C3 residential. Not only would these secure the ongoing employment functionality of the site and wider SIL designation but would also assist the Borough in addressing their housing shortfall¹.</p> <p>¹ Our analysis of the Council’s draft housing policies and current 5-year housing land supply position is detailed in the Regulation 18 Local Plan representations. This confirms there is a significant need to identify further sites for housing delivery within the emerging policy context and that this should be supported by the intensification of existing site and co-location of uses.</p> <p>The previous representations also demonstrated the sites suitability, achievability and availability for a mix of uses (commercial and residential).</p> <p>Our recommendations were for the Council to update the policy wording associated with Policy EC2 (Protecting Employment Sites and Delivering New Workspace) to enable the co-location of uses in this SIL location, together with the sites specific allocation (Allocation 25) to include references to the intensification</p>

			of employment uses, the acceptability of residential uses and inclusions of a realistic indicative capacity for development, in line with the strategic development framework, particularly London Plan Policy E7.
Avison Young representing an individual	5 Potential Development Sites	Land at Randlesdown Road site Bellingham	<p>Site Context</p> <p>A detailed summary of the sites context and planning history is provided in the Regulation 18 representation submitted to the Council on 9th April 2021 in response to the Lewisham Local Plan Regulation 18 Consultation. These should be read in conjunction with this letter.</p> <p>In summary, the site measures c. 0.3ha and is located at the junction of Randlesdown Road and Bromley Road, Lewisham. It comprises a number of existing buildings and uses, including former B2, B8 uses, C3 residential uses, and Sui Generis Uses (including Hot Food Takeaway).</p> <p>A Site Plan is enclosed at 6 Appendix I. This demonstrates that the site is bordered to the north by Stagecoach Catford Garage (a storage facility for buses), beyond which is Bromley Retail Park and residential development; to the east by the A21, beyond which is a parade of retail shops and existing residential dwellings; to the south by a parade of shops adjacent to Randlesdown Road; and to the west by the Ravensbourne River and Franthorne Way, the latter of which provides access to the Bellingham Trading Estate.</p> <p>Vehicular access is provided by the A21, or alternatively, via a service yard to the rear of the site. Bellingham Train Station is located 200m away, whilst north and southbound bus stops are located within 100m of the site frontage on the A21.</p>
Avison Young representing an individual	5 Potential Development Sites	Land at Randlesdown Road site Bellingham	<p>Policy Context</p> <p>The London Borough of Lewisham (LBL) are currently in the process of preparing a new Local Plan which will guide future development within the Borough to 2040. The main objective for the Plan is to achieve ‘An Open Lewisham as part of an Open London.’ This reflects the Council’s commitment to positively managing growth.</p> <p>As we note above, the Council has recently undertaken its Regulation 18 Consultation associated with the new Local Plan (Town and Country Planning (Local Planning) Regulations 2012).</p> <p>Following this consultation, the Council intend to prepare the Submission version of the Plan (Regulation 19). The LDS confirms that consultation in relation to this version of the Plan is due to take place in Autumn 2021, however, we understand this has been delayed and is likely to take place in early 2022.</p> <p>The A21 Development Framework is being prepared in conjunction with the new Local Plan and once adopted, will become planning guidance. It will therefore form a ‘material consideration’ for future development in the corridor.</p>

Avison Young representing an individual	5 Potential Development Sites	Land at Randlesdown Road site Bellingham	<p>A21 Development Framework Representations</p> <p>It is not our intention to replicate the content of the consultation material, however, there are particular areas which are pertinent to respond to. This section of our representations is therefore structured so as to align with the contents of the draft Framework document.</p>
Avison Young representing an individual	5 Potential Development Sites	Land at Randlesdown Road site Bellingham	<p>We note that the Area-Based strategy provides a list of key projects including: Ravensbourne River towpath and pedestrian bridge; improvements to Bellingham High Street and station surrounds, improvements to green space at Bromley Road Retail Park, terraced parades enhances, redesigning the A21 junction with Bellingham Road. As we consider above (Vision Guiding Principles) and throughout the remainder of these representations, the redevelopment of Site 13 presents a unique opportunity that enables a number of these key projects to be achieved.</p>
Avison Young representing an individual	5 Potential Development Sites	Land at Randlesdown Road site Bellingham	<p>We do however note that the Area-Based Strategy identifies Bellingham as having “++” suitability for supporting building heights. Notwithstanding this, the draft Tall Building Study (2020) and Regulation 18 Local Plan states Bellingham has a medium to high suitability for supporting tall building. The Regulation 18 version of the Local Plan defines tall buildings at Policy QD4. Part D of the wording confirms:</p> <p><i>“Within Lewisham tall buildings are defined as building that cause a significant change to the skyline and which:</i></p> <ul style="list-style-type: none"> <i>a. Are 30 metres or more in height, except in the designated Thames Policy Area where they are buildings 25 metres or more in height; or</i> <i>b. Are significantly taller than the prevailing height of building in the immediate and surrounding area.”</i> <p>Taller buildings are defined as <i>“those that project above the prevailing heights of buildings and structures within a sites immediate and surrounding area (normally, but not exclusively, 2 to 3 storeys above).”</i> Policy QD4 goes on to confirm that <i>“Where [tall] buildings are appropriately sited and designed, they can help people to navigate through the Borough by providing reference points and emphasising the hierarchy of places (including creating or reinforcing wayfinding markers to nodes of cultural or civic activity and transport interchanges).”</i></p> <p>The Lewisham Tall Building Study (2021) and Characterisation Study (2020 include detailed assessment of local character and have informed the identification of locations considered suitable for tall building and those with particular sensitivities.</p> <p>Bellingham is identified in the Tall Building Study (2021) as having a medium to high suitability for supporting tall buildings and is less sensitive when compared to other areas of the Borough.</p>

			<p>Taking this into consideration, we would strongly recommend that these conclusions are reflected in the A21 Development Framework's approach and building heights strategy.</p> <p>We would also add that the precedent for a taller building at Site 13 has been tested by an Inspector through the appeal process (APP/13/2192356). The proposals included the demolition of existing building and erection of a building comprising retail space (former Class A1) and hotel (former Class C1) fronting onto Bromley Road with basement car / cycle parking, ground floor coach parking/drop of point, servicing area and vehicular access via Franthorne Way. The hotel, as proposed, would extend to 6 stories and would comprise 114 beds.</p>
Avison Young representing an individual	5 Potential Development Sites	Land at Randlesdown Road site Bellingham	<p>The Inspector's Decision is appended to these representations at 6 Appendix II and confirms at Paragraph 36 the proposed building <i>"would be comparable in height to existing buildings to the south of Randisbourne Gardens and Delamare Court. As such, the scale of the development would be compatible with the street scene."</i></p> <p>As a result of the above, we are of the view that the height suggest within the A21 Development Framework <i>"Overarching Guidance – Area-Based Strategy"</i> are an appropriate starting point future development and that a tall building can be successfully integrated into the character of the area. However, matters relating to the height, scale and massing of future development proposals should be tested further during the pre-application and planning process. We turn to these matters in further detail when addressing the "Potential Development Sites", below.</p>
Avison Young representing an individual	5 Potential Development sites	Land at Randlesdown Road site Bellingham	<p>This chapter focuses on potential development sites within the study area and for each site, confirms its proposed future uses, potential site capacity and an indication to the type of layout, scale and massing that could be delivered.</p> <p>As we note in the introduction to these representations, the Land at Randlesdown Road is identified as Site 13 and is allocated for mixed-use development including Class E and F uses at ground floor levels, and C3 residential uses above. We are very supportive of this allocation, however, the subsections below set out our site-specific recommendations to ensure the Framework is positively prepared.</p>
Avison Young representing an individual	5 Potential Development sites	<i>Land at Randlesdown Road</i>	<p>We set out in our previous representations the viability complexities associated with Site 13, specifically that the existing land values and development costs associated with the refurbishment or redevelopment of the existing buildings would not be viable for solely commercial uses. As we have already noted, this was tested at appeal (APP/C5690/A/2192356 –</p>

		Land Use	<p>decision notice enclosed at 6 Appendix II) where the Inspector concluded at Paragraph 21 that <i>“given the existing land values and development costs refurbishment of the existing building or redevelopment for industrial or storage purposes is not viable. The Council did not challenge the appellant’s figures or costing in this respect and therefore the scope for change to other uses that are entirely appropriate within a SIL is extremely unlikely at the present time.”</i></p> <p>Our client is therefore very supportive of the principle of the proposed mix of uses detailed in the site-specific capacity study for Site 13, including Class E (Commercial, Business and Service uses) and Class F (Learning and Non-Residential Institution and Local Community Uses).</p> <p>The capacity study includes the requirement to re-provide 725sqm of non-residential floorspace.</p> <p>Our client is broadly supportive of the principle of this combination of uses but wants to work with the Council on the overall quantum, particularly as a result of the scheme / co-location viability, demand for uses and market evidence to support the principles adopted.</p> <p>Our client supports the flexibility that the proposed uses would bring, including Class E / F uses, which would allow a mix of non-residential uses to be brought forward along the A21 frontage.</p> <p>It should be noted that the overall quantum of development pertaining to the proposed land uses will need to be tested to ensure an appropriate mix of uses is provided on the site and subsequently enabling it to be brought forward (i.e. viable). This will need to take account the complex viability matters associated with the site, its restoration and the combination of uses, whilst not precluding the co-location of residential uses.</p>
Avison Young representing an individual	5 Potential Development sites	<p><i>Land at Randlesdown Road</i></p> <p>Development Capacity / Density</p>	<p>We have reviewed the proposed density detailed in the sites capacity study and, in the first instance, note that the proposed 155 units per hectare has potentially not been calculated correctly, resulting in incorrect residential quantum. We request further clarity from Lewisham as to how 155 units per hectare has been applied to Site 13.</p> <p>In the first instance, we have considered similar schemes within Bellingham to further understand the Council’s approach to applying density, including 335-337 Bromley Road (Application Reference: DC/09/07315/X). This site is located approximately 0.4 miles to the south of the Land at Randlesdown Road.</p> <p>The case officer’s report confirms the site is located in an urban setting on a prominent corner within the busy transport corridor of Bromley Road. The site had a PTAL rating of 3. The site characteristics of 335-337 Bromley Road is similar to our site in terms of its location and size, albeit the Land at Randlesdown Road can be considered to be better connected with a PTAL rating of 4.</p>

The density of the consented scheme at 335-337 Bromley Road equates to 648 habitable rooms per hectare, or approximately 230 dwellings per hectare. This decision pre-dates the current development plan, and arguably does not make the best use of previously developed land.

Nevertheless, this is still more dense than suggested by the Council for the Bromley Road draft allocation. We maintain that a higher density would maximising the potential of our sites to ensure development is compatible with the objectives of the Framework, the local context, design principles and public transport capacity.

Furthermore, and as we set out in our previous representations, Lewisham's Site Allocations Background Paper (2021) confirms the methodology underpinning indicative site development capacities. This Paper forms part of the evidence base for the emerging Local Plan and informs the basis for which the sites capacity should be taken forward.

Paragraph 6.1 of the Paper confirms that *"in order to measure delivery against the Borough's future needs (particularly for housing, employment and town centre / retail floorspace) it is important to establish **indicative** site development capacities for proposed site allocations."* Furthermore,

Paragraph 6.3 states that *"The indicative capacity should not be read prescriptively. The **actual** site development capacity of a site will ultimately need to be determined through the detailed design and planning approval process."*

Indicative site capacity within the Paper are detailed at Paragraph 6.3 and were subsequently established through: i) existing planning consents; ii) pre-application stage proposals; iii) masterplan sites. For all other sites, the starting point for establishing indicative capacity has been informed by the use of a standard methodology, based on the density assumption used in the London-wide SHLAA (2017) methodology and includes considerations of:

- The size of the site (site area);
- The character of the site (suburban, urban, central);
- Baseline assumptions on density in these character typologies;
- PTAL;
- Mix of land uses; and
- Existing housing units and non-residential floorspace.

In assessing the capacity of the site, the Council considers that a density of 225 units per hectare is assumed for a site with a PTAL of 4-6 in an urban setting, where there are no sensitivities to consider. The supporting Paper therefore confirms that the starting point for capacity at Site 13 is 225 dwelling per hectare. This would result in an overall quantum of development equating to 68 dwellings.

Notwithstanding this, the Paper confirms at Part 5 to Paragraph 6.3 that, a sense-check exercise was carried out *“to assess whether the **baseline capacity figure** (standard methodology derived) was feasible and appropriate to the site context. The indicative capacities were considered against actual development capacities that had recently been achieved on major development scheme in different parts of Lewisham, as set out in the Council’s Residential Density Technical Paper (2020).”*

The Council’s Residential Density Technical Paper (2020) takes a different approach to the baseline capacity figures and notes that the average residential density on schemes permitted by Lewisham within 400m of Bellingham railway station was 396 dwellings per hectare.

The Site Allocation Background Paper (2021) confirms that where there were considered to be significant character and / or design constraints, the capacity was informed through a sensitivity process taking into account the site context including: i) heritage assets; ii) open spaces, waterway and nature conservation sites; iii) transition sites within but at the edge of centres, where there is a particular need to consider townscape; and iv) transition sites outside of town centres and within established residential areas or the Opportunity Area corridor. To respond to these sensitivities, sites were adjusted down (e.g. from central to urban) with a commensurate adjustment to the development densities applied.

When considering the sensitivities of the site against the methodology, we can confirm:

- There are no listed heritage assets within or adjacent to the site boundary. The nearest listed building is located 100m to the west of the site and include The Fellowship Inn (Grade II Listed). This building is screened from view and development of the site would not impact the listed building, or its setting.
- The site does not comprise existing area of open space or nature conservation sites. The River Ravensbourne is located to the north of the site, but as we note above, there are potential opportunities to provide residential access to this waterway. Redevelopment of the site would therefore act as an enabler for this.
- The site is not a transition site at the edge of centre where there is particular need to consider townscape. Indeed, Lewisham’s draft Tall Building Study identifies the site as having a medium – high suitability for tall buildings.
- The site is not a transition site outside of a town centre, or with a residential area or the Opportunity Area Corridor. It is an existing SIL location.

In any event, the site is in a Growth Area location in which densities, and development potential are explicitly required to be maximised. We are therefore of the view, that the site should not be subject to any “downgrading” and given the proximity of its location to the railway station, together with the local context and character, the indicative density would be expected to be significantly higher than 225 units per hectare.

			<p>We consider the Council’s indicative development capacity to be stringent in a co-location scenario which would result in a capacity significantly lower than what could reasonable be delivered the re-development of the site.</p> <p>The starting point in establishing an indicative capacity figure should accord with the results of the Residential Density Technical Paper (2021): 396 dwellings per hectare.</p> <p>We have also considered sites of a similar size or PTAL rating within the A21 Development Framework and note inconsistencies with the Council’s approach. Specifically:</p> <ul style="list-style-type: none"> • Site 10 (Royal Mail / Topps Tiles). This site is located within the Bellingham Character Area and is 0.31ha in size. It has a PTAL of 4 and is assessed as being able to support a density of 209 units per hectare. This is 54 dwellings greater than Site 13. • Site 12 (Motor services / garages). This site is also located within the Bellingham Character Area and equates to 0.2ha in size. St Dunstans College Jubilee Ground forms the northern boundary. It’s PTAL rating is 2 and it is assessed as being able to support a density of 200 hectare; 45 dwellings more than Site 13. <p>In both instances, these have been allocated higher densities and our site is arguable more suited to a high density development in excess of even 209 units per Hecate.</p> <p>Taken in the round, the above therefore demonstrates the acceptability of the higher indicative density at Site 13, that any reference should be indicative and that the density of any development will need to be tested through the design-led process, in line with the requirements of the London Plan Policy GG2 (Making Best Use of Land), Policy D2 (Infrastructure Requirements for Sustainable Densities), and Policy D3 (Optimising Site Capacity Through the Design-led Approach).</p>
Avison Young representing an individual	5 Potential Development sites	<p><i>Land at Randlesdown Road</i></p> <p>Height, Scale and Massing</p>	<p><i>Suitability of the Site for a Tall Building</i></p> <p>The draft Local Plan Regulation 18 sets out the local definition for tall buildings in Lewisham at Policy QD4, Part D. This confirms:</p> <p><i>“Within Lewisham tall buildings are defined as buildings that cause a significant change to the skyline and which:</i></p> <p><i>a. Are 30 metres of more in height, except in the designated Thames Policy Area where they are buildings 25 metres or more in height; or</i></p> <p><i>b. Are significantly taller than the prevailing height of buildings in the immediate and surrounding area.”</i></p>
Avison Young representing an individual	5 Potential Development sites	<p><i>Land at Randlesdown Road</i></p>	<p>Paragraph 5.29 of the supporting text confirms that taller buildings <i>“are those that project above the prevailing heights of buildings and structures within a sites immediate and surrounding area (normally, but not exclusively, 2 to 3 storeys above).”</i></p>

		Height, Scale and Massing	
Avison Young representing an individual	5 Potential Development sites	<i>Land at Randlesdown Road</i> Height, Scale and Massing	Figure 5.1, supporting the proposed policy, is taken from the draft Tall Building Study (2021). As we have already noted, this confirms the site has a medium – high suitability for tall buildings. We have already commented that this is not reflected within the Overarching Guidance set out in the A21 Development Framework, and that this should be updated. We are also of the view, that the site-specific assessment should also be updated to reflect the evidence base prepared by the Council.
Avison Young representing an individual	5 Potential Development sites	<i>Land at Randlesdown Road</i> Height, Scale and Massing	<p>Page 127 of the A21 Development Framework identifies the constraints and opportunities associated with the site (Figure 2). This confirms that a “<i>taller building where impact on neighbouring properties is minimised</i>” is suitable in the northern portion of the site, and two buildings of potential height are acceptable along the A21 corridor (see below figure).</p> <p>Figure 1: Site 13 Site Opportunities and Constraints Diagram (taken from the A21 Development Framework Document)</p> <p>Notwithstanding this, the massing drawing shown on Page 128 at Figure 3 (see below) does not reflect Figure 2, rather it demonstrates a single storey in place of a taller building and a lower height along the frontage of the A21 (4 storeys) in comparison to Randlesdown Road (6 storeys). This is at odds with the objectives of the Framework, when taken as a whole, specifically the Overarching Guidance relating to Building Heights.</p> <p>Figure 2: Site 13 Proposed Massing (taken from the A21 Development Framework Document)</p>
Avison Young representing an individual	5 Potential Development sites	<i>Land at Randlesdown Road</i> Height, Scale and Massing	<p>The guidance provided earlier in the A21 Development Framework document confirms that tall buildings should face directly onto the A21 (Paragraph 2.6), therefore restricting tall buildings to areas on the A21 corridor, which sets “<i>good conditions for taller building developments due to its width and the north-south orientation of the corridors. This means that properties on the other side of the corridor will not be compromised or dominated and there will not be undue overshadowing</i>” (Paragraph 2.7).</p> <p>Paragraph 2.8 suggests that height has been restricted in certain character areas to avoid undue harm to existing local character and townscape, and to avoid overshadowing, however, no indication as to which character areas this relates to is provided. We consider Bellingham, and</p>

			<p>indeed the site, provides a very good opportunity to accommodate a tall / taller building due to the conclusions drawn from the draft Tall Building Study (2021) (medium – high suitability for a tall building) and also due to its locational circumstances.</p> <p>In considering the locational circumstances of the proposed development site, and as we set out earlier in the representations, the site is bound by uses and neighbours which are not considered sensitive to overlooking and / or overshadowing. This is supported by our assessment of a tall / taller building below, in line with London Plan Policy D9 and Local Plan Policy QD4, which concludes that the any environmental / visual impacts arising from future proposals for a tall building can be suitably mitigated through the design and pre-application process; an approach supported by Paragraph 2.92 of the A21 Development Framework.</p> <p>2 Paragraph 2.9 confirms: <i>“Heights for specific sites will be subject to further testing through the pre-application process which may determine that lower or taller development than the indicatives thresholds is appropriate.”</i></p>
Avison Young representing an individual	5 Potential Development sites	<p><i>Land at Randlesdown Road</i></p> <p>Height, Scale and Massing</p>	In addition to the above, the Framework support the <i>“opportunity for increased height”</i> at corner sites, <i>“providing they take into consideration privacy and overshadowing issues”</i> (Paragraph 2.12).
Avison Young representing an individual	5 Potential Development sites	<p><i>Land at Randlesdown Road</i></p> <p>Height, Scale and Massing</p>	Furthermore, Page 30 of the Framework notes that <i>“new developments along A21 should respond to prevailing building heights but also consider increased heights to distribute air pollution”</i> (Paragraph 2.55). Site 13 provides an ample opportunity for this to be achieved, with variations in building height (including a tall building) to be tested through the pre-application design process.
Avison Young representing an individual	5 Potential Development sites	<p><i>Land at Randlesdown Road</i></p> <p>Height, Scale and Massing</p>	<p>The site, in its current form is, severely under-used, and in light of the increased housing requirement in Lewisham, together with the Council’s need for additional housing sites, the proposed development provides a opportunity to provide a high-quality mixed-use development within a tall building, that acts as a wayfinder for Bellingham Station, and provides further active frontages along the A21. By enabling tall and taller buildings at the proposed development site, the wider objectives of the Framework would be met including:</p> <ul style="list-style-type: none"> • Maximising the delivery of new homes to meet Borough shortfall needs;

			<ul style="list-style-type: none"> • Strengthen the distinctiveness of local centres, enhance the historic environment, and meet local employment and infrastructure needs; • Support better air quality and create an exemplary healthy street at scale through the variation in building heights (supported on Page 30 of the Framework); • Promote sustainable modes of transport, by acting as a wayfinding landmark building for the train station; and • Secure and rhythm of pause and intensity, by providing active ground floor uses in Class E and F. <p>We are therefore of the view that Site 13 is suitable for tall buildings and taller buildings in the context of the local definition³, and further clarity is sought from the Council regarding the massing proposals in Figure 3 (Page 128) and how these have been concluded. At present, the A21 Development Framework does not reflect the Council’s supporting evidence base, or indeed, the emerging Local Plan context.</p> <p>³ Lewisham’s definition of tall buildings contained within Local Plan Policy QD4 confirms a tall building as being 30m in height, whilst a taller building is considered to be 2-3 storeys higher than the surround building (although this is not exclusive).</p>
Avison Young representing an individual	5 Potential Development sites	<p><i>Land at Randlesdown Road</i></p> <p>Height, Scale and Massing</p>	In support of the recommendations to increase the height, scale and massing of the proposed development we have assessed the site against the criteria set out in London Plan Policy D9, Part C and LBL’s emerging Local Plan Policy QD4 to further demonstrate its suitability for a tall building (Table 2).
Avison Young representing an individual	5 Potential Development Sites	<p>Local Plan</p> <p><i>Land at Randlesdown Road</i></p> <p>Height, Scale and Massing</p>	Table 2: Assessment of the Proposals against London Plan Policy D9 and London Plan Policy QD4.

Table 2: Assessment of the Proposals against London Plan Policy D9 and London Plan Policy QD4.

Policy Criteria	Land at Randlesdown Road Response
London Plan Policy D9, Part C	
1. Visual Impacts	
a) The views of buildings from different distances:	
<p>a. Long-range views - these require attention to be paid to the design of the top of the building. It should make positive contribution to the existing and emerging skyline and not adversely affect local or strategic views.</p>	<p>The site is not located within a Protected Vista: Wider Setting Consultation Area or Landmark Viewing Corridor.</p>
<p>b. Mid-range views from the surrounding neighborhood - particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality.</p>	<p>It is not located within a local view. Development of the site would not, therefore, impact these strategic and local designations.</p>
<p>c. Immediate views from the surrounding streets - attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy</p>	<p>A future pre-application and planning application would support the testing of any necessary views and we would expect this to form a requirement associated with the delivery of the site, in line with Paragraph 2.9 of the A21 Development Framework, London Plan Policy D9 and Local Plan Policy QD4 requirements.</p>
<p>b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding.</p>	<p>The Council's draft Tall Building Study (February 2021) and emerging Local Plan supports tall building, as defined by the London Plan (2021) in this location. The design of a tall building in this location could be read as part of the spatial hierarchy and is</p>

				wholly supported by the Framework in terms of being situated in a focal location which would guide people to the station (Paragraph 3.39), is a corner site (Page 21) and fronts on to the A21.
			c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan.	The appearance and materiality of any future proposal would be carefully examined through the design process, however, would respond to the character of the surrounding area as defined in the Framework's Character Area assessment.
			d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public that outweigh that harm. The building should positively contribute to the character of the area.	There are no statutorily listed historic assets within, or adjacent to the site boundary. The nearest heritage assets are approximately 100m to the west and include the Fellowship Inn Pub and attached hall (Grade II). A number of residential buildings located to the south east are also Grade II listed heritage assets. Due to their location and existing intervening buildings, the future redevelopment of the site for a tall building is unlikely to harm the significance of these assets. This matter will be tested during the preparation of a planning application.
			e) building in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it.	The site is not located in the setting of a World Heritage Site. This criterion is not therefore applicable.
			f) buildings near the River Thames, particular in the Thames Policy Area, should protect and enhance the quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river.	The site is not located in the Thames Policy Area and so this criterion is not applicable.
			g) buildings should not cause adverse reflected glare.	The buildings will be designed to minimize reflected glare through the choice of materials. This will be tested during the pre-application and planning process.
			h) buildings should be designed to minimize light pollution from internal and external lighting.	The location of building cores will be considered through the design process but will orientated so as to reduce the amount of light spill. Upper floor lighting would be from individual flats and there would be external

			<p>lighting to the building and to the public realm. A lighting strategy for the commercial scheme would also be prepared. We would expect the lighting scheme to be controlled by an appropriately worded condition at the point at which a planning application is prepared.</p>	
			<p>2. Functional Impact</p>	
			<p>a) the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants.</p>	
			<p>b) buildings should be serviced, maintained, and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to the surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process.</p>	<p>The functional impacts of a tall building would be tested during the application process in consideration with other development control policies. We consider these matters will be appropriately mitigated as a result of this process resulting in no adverse impact on neighbouring uses.</p>
			<p>c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas.</p>	
			<p>d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building.</p>	<p>Any tall building would be accompanied by evidence to demonstrate that the development and the impacts of the development, can be accommodated within existing or proposed transport mode capacities.</p>
			<p>e) jobs, services, facilities, and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area and maximises the role of the development as a catalyst for further change in the area.</p>	<p>A tall building located on the site would bring economic benefits not least through its construction, but also from the financial spend associated with an increase in residents to the area. In addition, the proposed development would increase employment opportunities beyond the existing site provision.</p>
			<p>f) buildings, including their construction, should not interfere with aviation, navigation,</p>	<p>The site is not subject to any local aviation and / or telecommunication constraints. A tall</p>

			<p>or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings.</p> <hr/> <p>3. Environmental Impacts</p> <p>a) wind, daylight, sunlight, penetration and temperature conditions around the building(s) and neighborhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building.</p> <p>b) air movement affect by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions.</p> <p>c) noise created by air movement around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building.</p> <hr/> <p>4. Cumulative Impacts</p> <p>a) the cumulative visual, functional, and environmental impacts of the proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting.</p> <hr/> <p>LBL Emerging Local Plan Policy QD4</p> <p>a. Contributes to the delivery of the spatial strategy for the Borough.</p> <hr/>	<p>building in this location is unlikely to impact on the solar generation of adjoining buildings due to the nature of those uses (bus depot to the north, A21 to the east, parade of shops to the south, and the river to the west).</p> <hr/> <p>We consider these matters to form the qualitative criteria of Policy D9, Part C and so would not ordinarily be tested until the planning applications stage. We would anticipate detailed pre-application discussions to deal with these matters</p> <hr/> <p>It is anticipated that the building plant would be located on the roof of the proposed building and would therefore have no impact on the enjoyment of open spaces around the building.</p> <hr/> <p>We note that the surrounding context immediately adjoining the site includes a number of tall buildings ranging from 6 - 8 storeys. The visual, functional and environmental impacts of the proposed development at Site 13 would therefore be tested alongside these cumulative schemes, however, as a result of these, we wouldn't expect the results of this testing to be contrary to the support provided for a tall building.</p> <hr/> <p>The site has been identified in the draft A21 Development Framework as suitable for supporting mixed-use development including Class E / F uses at lower levels and Class C3 residential uses at higher levels. The site, in our view, demonstrates the capability of providing a much higher density and</p> <hr/>
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				therefore a tall building to provide greater support to the Borough for meeting the identified shortfall in housing along the corridor.
			b. Is of an exceptional design and architectural quality.	As noted in the assessment of the site and its suitability against the London Plan criteria, the sites design and architectural quality would be tested through the application process and would
			c. Is designed with building heights that are sensitive to the sites immediate and wider context having regard to Figure 5.2, including the distinctiveness of Thames Policy Area, in line with Policy LNA4 (Thames Policy Area and Deptford Creekside).	Figure 5.2 accompanying Policy QD4 confirms the site has a medium to high suitability for support tall buildings. The immediate context surrounding the site also comprises buildings of 6-8 storeys. We are therefore of the view that a scheme could be designed that reflects these building heights and is sensitive to the wider residential context of Bellingham.
			d. will not result in adverse visual, functional, environmental and cumulative impacts, having regard to the requirements of draft London Plan Policy D8 (Tall Buildings).	As demonstrated in our assessment of the site against Policy D9 of the London Plan, we are of the view that a number of the qualitative criterion would be tested and assessed during the pre-application and subsequent planning process. At present, the available evidence does not preclude the development of a tall building in this location from a visual, functional and environment perspective.
			e. Makes a positive contribution to the townscape and skyline.	Given the immediate and wider context, a tall building in this location would make a positive contribution to the townscape and skyline. The sites redevelopment presents a significant opportunity to regenerate this area of the A21 corridor and replace low-grade commercial space with higher quality accommodation which would support the functionality of the SIL.
			f. Protects strategic and local views, vistas and landmarks, including strategic background views, having regard to Policy QD5 (View Management).	The site is not located in a protected strategic and / or local views or vista. There are no local landmarks or strategic background views in Bellingham.
			g. Provides a high-quality public realm in line with Policy QD3 (Public Realm and Connecting	Any public realm and communal amenity space will be tested through the pre-

			<p style="text-align: center;"> <u>Places). Where appropriate, development will be required to make provision for free to enter, publicly-accessible areas that are incorporated into the building.</u> </p> <p style="text-align: center;"> <u>application and planning process. It would be designed to be attractive, manageable and well-functioning for residents and visitors.</u> </p> <p>The above demonstrates the delivery of a tall building on the proposed development site is suitable at the Land at Randlesdown Road and such a designation should be included in the Allocation.</p>
<p>Avison Young representing an individual</p>	<p>5 Potential Development Sites</p>	<p>Local Plan <i>Land at Randlesdown Road</i></p>	<p>To draw together the above analysis to a conclusion, we recommend the following amendments are made to the A21 Development Framework to ensure it is appropriately prepared and takes account the existing strategic and local planning policy framework (London Plan 2021 and emerging Local Plan) and the Council’s evidence base (Lewisham draft Tall Building Study 2021, Characterisation Study 2019):</p> <ul style="list-style-type: none"> • The draft Tall Building Study (February 2021) identifies the site as having medium – high suitability for supporting a tall building. This is also supported in the Regulation 18 version of the emerging Lewisham Local Plan (at Figure 5.1) and should be reflected in the assessment of Bellingham in the A21 Development Framework. • Figure 2, Page 127 of the Framework, does not reflect the policy context noted above, nor does it reflect the development objectives included in the Frameworks ‘Overarching Guidance’, specifically locating tall buildings along the frontage of the A21 (Paragraph 2.5); the opportunities corner sites provide for taller sites (Paragraph 2.12), and the conclusions drawn earlier in the A21 Development Framework which note the site is suitable for tall and taller buildings (Page 47). • The site has been assessed against the criteria set out in London Plan Policy D9 and emerging Local Plan Policy QD4 and this further demonstrates its suitability for supporting a tall building. Points of technical matter, including any potential daylight and sunlight impacts, will be assessed during the formal planning process. <p>The allocation associated with Site 13 should therefore be amended to support a tall building and include taller elements in the proposed massing reflecting the conclusions of Figure 2 and the principles of tall buildings along the A21.</p>

Avison Young representing an individual	5 Potential Development Sites	Open Space Assessment/ <i>Land at Randlesdown Road</i>	<p>Lewisham Open Spaces Assessment was prepared in January 2020 and identifies The Waterlink Way as an opportunity to promote the delivery of green infrastructure across London in line with the All London Green Grid (ALGG) policy framework (London Plan Policy G1). The strategic objectives include improvements to signage, walking and cycling infrastructure between Deptford Creek, Greenwich Park, Blackheath, Lewisham and Lower Sydenham, together with adjoining spaces, including Beckenham Place Park, Hilly Fields, Ladywell Fields and Mountsfield Park.</p> <p>In the first instance Site 13 is note located in the identified improvement areas.</p> <p>The Open Space Assessment has considered the typologies of public open space across Lewisham against the requirements of Section 7.18 of the London Plan 2016 and Policy G4 of the Draft London Plan which requires local planning authorities to identify areas of public green and open space deficiency using categorisations for a number of different open spaces, including: regional parks; metropolitan parks; district parks; local parks and open spaces; small open spaces; pocket parks; and linear open spaces. Adopted London Plan Policy G4 includes the same categorisation table at Table 8.1, noting that this should be used <i>“as a benchmark for the different types required”</i> (Part D of the policy wording).</p> <p>Contrary to the conclusions of Section 5.2.1 of the Assessment, which states that there is an under-provision of Local Parks in Bellingham, Map 9 (enclosed at Section 11) confirms that Site 13 is within the catchment of two local parks. Furthermore, Paragraph 5.3.3 of the Assessment, which considers the south sub-area, including Bellingham, Whitefoot and Downham Wards, confirms that the sub-area is dominated by a number of large sites including Beckenham Place Park, Downham Fields, Forster Memorial Park and Hither Green Cemetery. The Assessment states that <i>“these areas are interspersed with smaller open space sites of different typologies which, inter alia, [form] a succession of inter-connected open space sites of different typologies.”</i></p> <p>Section 6.1 provides the results of the Quality Assessment, notably <i>“Borough-wide, there are a number of clusters of ‘fair’ quality greenspaces whose quality could be uplifted to ‘good’ but these clusters do not lie within the Opportunity Area and are thus not subject to the most significant population increase.”</i> Those identified include a cluster of sites running south east from Crofton Park to Bellingham.</p> <p>6 Appendix 4 to the Assessment provides the Greenspace Information for Greater London. This confirms that the whole A21 Development Framework Corridor is deficient in open space, particularly relating to Local, Small</p>
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			<p>and Pocket Parks, suggesting that all Character Areas within the Framework Study area should be targeted to improve access to open space.</p> <p>Site 13 is located outside of an area deficient in access to Sites of Importance for Nature Conservation, District Parks, and also Metropolitan Parks.</p> <p>Taking the above into consideration, the evidence base confirms that large areas of the Borough area deficient in access to smaller typologies of open space, but that Site 13, in particular, would have good access to SINCS and District and Metropolitan Parks. London Plan Policy G4 confirms that the categorisations set out in Table 8.1 and used within Lewisham’s Open Space Assessment should be used as a benchmark for the different types required and should not therefore be limiting. Indeed, the Assessment concludes that Bellingham, in particular, has a large number of smaller, undesignated areas of open space. We therefore suggest that there may be merit in reviewing the status of these areas and, where appropriate, and including them within the relevant typologies for Bellingham so as to present a more accurate representation.</p> <p>Notwithstanding this, the Assessment suggests that Bellingham has a ‘fair’ quality of greenspaces available. In addition, we are of the view that due to the location of the site and its characteristics, it does not lend itself to the provision of publicly accessible open space.</p> <p>As we have noted both in these and earlier representations, the inclusion of public open space should not take precedent over the wider aspirations of the allocation of Framework, that being to maximise the delivery of residential uses to support the delivery of housing within the Borough.</p> <p>We therefore reserve the right to test this element of the scheme through the design-led process, in line with the principles of Local Plan policy QD3.</p>
Avison Young representing an individual	5 Potential development sites	<p>Compliance with the adopted and emerging Local Development Scheme</p> <p><i>Land at Randlesdown Road</i></p>	<p>The A21 Development Framework, once adopted, will be a planning guidance document supporting Lewisham’s adopted Development Plan. It will add further detail to the policies of the development plan and will be used to provide further guidance in relation to specific sites. It will form a material consideration in the Council’s decision-making process.</p> <p>We are supportive of the identification of Site 13 for the co-location of residential and commercial uses with a Strategic Industrial Location in line with London Plan Policy E7 for the reasons we set out in our previous representations (relating to the Regulation 18 version of the Local Plan).</p> <p>London Plan Policy E7 requires the approach to co-location to be considered as part of a plan-led process, or part of a co-ordinated masterplanning process. This process would achieve this requirement, but we would therefore expect the Regulation 19 version of the Local Plan align with the assessment and conclusions drawn</p>

			<p>within the A21 Development Framework, and for the wording of Policy Allocation 25 to be updated to reflect proposed revisions to Site 13.</p> <p>The updated policy wording should, take account of the matters raised in these representations, including:</p> <ul style="list-style-type: none"> • The starting point for calculating Site 13's development capacity / density includes the Local Plan evidence base which suggests, due to its urban location, that 396 dwellings per hectare equates to a reasonable indicative figure. Notwithstanding this, proposed densities should be stated as an indicative figure to be tested through the design/development process which considers the complex viability process of delivering a colocation <p>Scheme The sites suitability for supporting a tall building and taller buildings, as identified in the draft Tall Building Study (2021), and in line with the objectives confirmed in the Overarching Guidance detailed in the A21 Development Framework Document, including: fronting onto the A21; including a corner location; and guiding people to the Station.</p> <ul style="list-style-type: none"> • Lewisham's Open Space Assessment considered there to be 'fair' quality greenspace within the Bellingham. The site itself lies within the catchment of two local parks and is not within an area of deficient for metropolitan and district parks, or SINCS. Coupled with this analysis, we are of the view that the site does not lend itself to providing publicly accessible open space due to its location, scale and context.
Avison Young representing an individual	5 Potential development sites	<p>Compliance with the adopted and emerging Local Development Scheme</p> <p><i>Land at Randlesdown Road</i></p>	<p>In addition to this, we consider the following points need to be addressed to ensure the Framework has taken account of the tests of soundness set out in Paragraph 35 of the NPPF:</p> <ul style="list-style-type: none"> • Apply an evidence-based approach (Residential Density Paper 2021) to calculating indicative densities, ensuring the same methodology is applied to sites of a similar size and urban characteristic, and to ensure that the development capacity is an indicative figure that must not be an upper limit, but that the development capacity should be achieved at by a design-led approach • Align locations suitable for tall buildings with the draft Tall Building Study (2020) and ensure potential developments sites have been tested against the most up-to-date policy context including London Plan Policy D9. • Ensure the proposed land uses take account of the relevant strategic and Local Plan policies, noting that there are no numeric requirements associated with the provision of amenity space, open space and publicly accessible open space within the proposed development.

Avison Young representing an individual	5 Potential development sites	Land at Randlesdown Road site Bellingham	<p>These representations are supportive of the A21 Development Framework, particularly the colocation of residential uses at Site 13. We are of the view that the site itself presents substantial opportunity to address the issues associated with Bellingham as a Character Area, by:</p> <ul style="list-style-type: none"> • Providing new and refreshing frontages in Class E and / or F uses. • Supporting a link to the new station by virtue of ensuring a landmark, wayfinding building which guides people to Bellingham Train Station is developed. This would align with the principles of QD4 which specifically states at Paragraph 5.32 that where appropriately sited, tall buildings <i>“inter alia, can help people navigate through the Borough by providing reference points, inter alia.”</i> • Ensuring the re-provision of good quality commercial and employment space to retain local jobs and strengthen local facilities. This will be intensified from currently lowdensity employment uses to high density employment and housing, in line with Paragraph 3.30 of the Framework. • Supporting tall and taller buildings and higher quantities of development along the A21 frontage and on a prominent corner plot, as identified on Page 47 of the Framework document, and in line with Paragraph 3.29 which supports the development of <i>“an attractive place at an important crossroad strengthening a ‘rung of the ladder’ by guiding people to the station”</i>. <p>Notwithstanding the specific objectives for Bellingham that would be realised as result of redevelopment and intensification of the Site, it would meet the wider aspirations of the Framework including:</p> <ul style="list-style-type: none"> • maximising the delivery of new homes to meet the Borough’s shortfall; • making the best use of a brownfield site; • strengthening the distinctiveness of Bellingham local centre enhancing the historic environment and meeting local employment needs; • promoting sustainable modes of transport by virtue of acting of a wayfinding building to Bellingham Train Station; • supporting better air quality and creating health streets by varying buildings heights; and • celebrating a rhythm of pause and intensity as a result of providing active street frontages.
Avison Young representing an individual	5 Potential development sites	Land at Randlesdown Road site Bellingham	<p>For the reasons set out in these representations, we are of the view that Site 13 could accommodate a higher density of development, resulting in a greater development capacity, and include a tall and taller buildings. We are of the view that there are opportunities to develop an appropriate landscape strategy which would satisfy the requirement of future residents, but that this should be proportionate to the development proposed and</p>

			consider the wider constraints associated with the delivery of open space, notably the locational context and relationship with uses included in the draft allocation.
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Table 3: Culverley Green Residents Association - all comments

Culverley Green Residents Association	5 Potential Development Sites		<p>Summary of Response</p> <p>CGRA is extremely concerned by the A21 DF as proposed, because the proposals for the 3 sites that are within the Culverley Green Conservation Area (CGCA), (Sites 10 – 12), would, without doubt, if implemented as indicated, cause a significant degree of harm. The Council is reminded of its responsibilities in respect of conservation areas when devising new plans, which of course the A21 DF is intended to be. The National Planning Policy Framework, (NPPF) states:</p> <p><i>190. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:</i></p> <p><i>(a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;</i></p> <p><i>(b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;</i></p> <p><i>(c) the desirability of new development making a positive contribution to local character and distinctiveness;</i></p>
Culverley Green Residents Association	1 Introduction and Vision	Introduction and Vision Spatial opportunities: Movement network	<p>Spatial Opportunities: Character section is wrong to exclude CGCA</p> <p><i>Page 17: 5. Culverley Green – a leafy suburban residential conservation area</i></p> <p><i>6. Bellingham – a proposed local centre that has an opportunity to turn big box retail into an intensified place to work, live and experience the river.</i></p> <p><i>1.39 “The Baseline Report studied 8 character areas. These areas are approximations of what is understood to represent local neighbourhoods. Culverley Green has not been included because of its limited development potential due to its designation as a conservation area.”</i></p> <p>CGRA contends that this section suggests that CGCA whilst indeed a “neighbourhood”, need not be included in the character areas since it will not be subject to redevelopment. However, the remainder of the A21 DF includes Sites 10 – 12 within the Bellingham Character Area, even though all three lie within the CGCA boundary (with site 11 also extending immediately to the west, in the immediate setting of the CGCA). This is simply an incorrect approach – given that three large sites lie within CGCA, it MUST BE included as a character area, and those three sites MUST BE appraised for development potential in the context of that character area, (not that for Bellingham), and the Council’s duties to preserve or enhance the heritage</p>

			asset. It is methodologically incorrect to treat the three Sites 10 – 12 as being within the Bellingham Character Area and thus not considered in the context noted.
Culverley Green Residents Association	5 Potential Development sites	Ravensbourne Retail Park	This responsibility includes the setting of heritage assets, which impacts on Site 11, as the NPPF states: <i>195. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.</i> <i>200. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.</i>
Culverley Green Residents Association	5 Potential Development sites	Ravensbourne Retail Park	Whilst it is acknowledged that the NPPF paragraph 202 requires decision makers to undertake a planning balance exercise where any proposal is found to represent Less Than Substantial Harm (LTSH) to a heritage asset, in order to set the harm against the benefits, that is a process for assessment of planning applications. In this case, the Council is proposing to adopt a policy document which would support development proposals which would inflict harm on the CGCA without having first undertaken the legally required planning balance evaluation. Thus the Council has focused on the benefit it perceives from redevelopment to accommodate housing need without any assessment whatsoever in respect of whether those benefits would outweigh the harm to the CGCA. The CGRA makes this bold statement because the A21 DF specifically excludes any assessment of the CGCA, since it states that as a conservation area it will not be subject to these proposals for redevelopment. This is incorrect, but the A21 DF erroneously subsumes the three sites in the CGCA, (Sites 10 – 12) which it identifies for redevelopment as being within the Bellingham Character Area.
Culverley Green Residents Association	5 Potential Development sites	Ravensbourne Retail Park	It does not take exegetical heritage assessment to appreciate that proposing large footprint blocks of flats of between 4 – 12 storeys on sites adjoining, or facing overwhelmingly 2 to 2½ storey detached or semi-detached houses, (even where now converted to flats), will cause a significant degree of LTSH to the character and setting of the CGCA. This fact is not altered by the presence of a few recent infill flatted developments of 3 – 4 storeys.
Culverley Green Residents Association	5 Potential Development sites	Ravensbourne Retail Park	The sensitivity of heritage assets in general, and of the CGCA is NOT lost on the A21 DF – as will be set out below – but there appears to be a deliberate intention to downplay or even ignore the importance of the character of the CGCA so as to focus some of the largest proposed residential redevelopments in the A21 DF within it and in its immediate setting.

Culverley Green Residents Association	5 Potential Development sites	Ravensbourne Retail Park	CGRA agrees that the three sites identified in the A21 DF which are within / partly within the CGCA and its setting where extending westwards are all sites which, notwithstanding their present commercial use, could be usefully redeveloped for residential or residential-led mixed use schemes. However, as summarized above, the view is that the heights proposed, and the lack of inclusion of any houses both represent unacceptable forms of development which cause undue harm. These sites are in use, and are not derelict eyesores desperately in need of redevelopment. Thus, there should not be a view that residential redevelopment is beneficial at any cost, but rather that it offers the potential to enhance the character of the conservation area in terms of appearance and character, provided the development is sensitive to the scale and height of existing buildings which contribute to the significance of the heritage asset which surround or face those sites. Thus as proposed, CGRA must OBJECT to the A21 DF.
Culverley Green Residents Association	5 Potential Development sites	General	The remainder of this submission demonstrates 1. How the A21 DF contradicts itself and importantly the Council’s CGCA Character Appraisal by wrongly classifying Sites 10 – 12 as being within the Bellingham Character Area; 2. What is unsatisfactory about the proposals for the redevelopment sites 10 – 12 in the Culverley Green area; and 3. What could be acceptable as a form of development on those sites.
Culverley Green Residents Association	5 Potential Development sites	Introduction and Vision Project introduction	Contradictions in the A21 DF <i>(references are the paragraph numbers in the A21 DF, with quotes in italics)</i> The A21 DF recognises the importance of protecting and enhancing heritage assets and the character of areas as illustrated in the following quotes: 1.2 <i>“As part of assessing the development potential for different areas along the A21 it is necessary to identify and describe how the historic environment should be preserved and enhanced and local character strengthened.”</i> <i>Guiding Principle #1“Massing can be increased beyond prevailing building heights in appropriate areas”</i> CGRA contend that “appropriate areas” should reflect the content of Guiding Principle #2. <i>Guiding Principle #2 ...“The distinctiveness and heritage of each centre and character area should be celebrated and enhanced.”</i> Guiding Principle #6 refers to the <i>“rhythm of pause and intensity”</i> , but CGRA contend that all Guiding Principles are of equal significance, and so #6 should be considered in the context of #1 and #2.
Culverley Green Residents Association	5 Potential Development sites	Introduction and Vision	How are the “distinct character areas” defined ? 1.8 <i>“The study area is divided into a series of 7 distinct character areas based around commercial centres along the A21”</i> BUT THIS IS DIFFERENT IN THE “VISION” section:

		Project introduction	<p><i>Vision “To define and enhance the character of the series of neighbourhoods that comprise the A21 area.”</i></p> <p>– Note use of ‘neighbourhoods, not ‘commercial centres’ – this is important, because CGCA is a neighbourhood, not a commercial centre. This needs to be considered in assessing appropriate site potential.</p>
Culverley Green Residents Association	5 Potential Development sites	Introduction and Vision Using this document	<p>Project Opportunities section does not recognise the distinctive character of the CGCA</p> <p><i>1.12 “[the corridor’s] identity is now primarily as a movement corridor, that is its movement function is greater than its place function”.</i></p> <p>CGRA contend this is incorrect – the CGCA character as a place, not a movement corridor, is very strong on both sides of Bromley Road, and thus to the south of Catford Town Centre, the function of the A21 is clearly identifiable as an Edwardian suburb throughout the CGCA. Even the Ravensbourne Retail Park (Site 11), was designed to respect the CGCA, with the traditional frontage green, enclosed by railings and a formal tree arrangement. Page 4 of 7</p> <p><i>1.19 “Historically, urban development in the south lands [south of Catford Town Centre] only commenced in the interwar period (with the exception of a small parade in Southend). Whereas the north lands had been developed notably since the Victorian era...”</i></p> <p>CGRA contend that this is blatantly incorrect, and presumably intended to justify the proposed height of buildings on Sites 10 – 12. This error of fact is clear from the Council’s own CGCA Character Appraisal – eg pages 6 - 7 “During the later 1890’s, a series of substantial villas, detached and semi-detached, began to spread along Canadian Avenue, laid out by 1894 and Bromley Road. ... The estate, which stretched for some distance south of Sangley Road, was built up piecemeal between 1902 and the 1920s, and became a typical middle class Edwardian suburb.”</p> <p><i>1.23 “For the south to realise its development potential, the framework seeks to identify areas for intensification and regeneration ... “</i></p> <p><i>1.24 “Overall, different scales of development will be appropriate for different locations along the A21”</i></p> <p>CGRA contends that the above opportunity intentions need to be considered in the context of the Vision and Guiding Principle #2, noted above, to meet the Council’s legal obligations to preserve and enhance the CGCA.</p>
Culverley Green Residents Association	5 Potential Development sites	Culverley Green	<p>What is unsatisfactory about the proposals for the redevelopment Sites 10 – 12 in the Culverley Green area; and</p> <p>What could be acceptable as a form of development on those sites.</p> <p>Site 10 Royal Mail – Topps Tiles</p>

			<p>CGRA has no objection to this site being identified for redevelopment for dwellings, but considers that: consideration should be given to the fact that the CGCA Character Appraisal identifies the view into this site from Inchmery Road as a 'View' on Figure 12.</p> <p>Additionally, the site should be considered as part of a formal section of urban townscape, where on the west side of Bromley Road to the north are large detached / semi-detached villas, and to the south, a street block which is occupied by a flatted scheme of 3 storeys plus recessed 4th floor, and to its south, a terrace of 3 storey flats over shops. Opposite are 2 and 3 storey houses.</p> <p>The need for replacement ground floor Class E & F uses is questioned, since the site is located between residential ground floor uses, and the very low value retail / food and beverage offer in the shops to the south demonstrates the likely limited need for these uses in this location, especially if Site 11 were to include Class E & F uses.</p> <p>As a result, the maximum acceptable height facing Inchmery Road should be 4 storeys, as shown, but this needs to be part of a formal, probably symmetrical composition, which is principally 3 storeys with short recessed 4th floors as features, eg at the corners. The scheme in the Capacity Study, with 4 and 6 storeys to Bromley Road lacks formality – it comprises two unrelated buildings, and is too tall for the location. There might be scope for 2½ or 3 storey townhouses or flats to Barmeston Road frontage, rather than 2 storey flats.</p> <p>The proposed forecourt fronting Bromley Road would perpetuate an unattractive treatment (which would be under pressure to be used for car parking), which was not original (there were houses with gardens on this site originally), and would be at odds with the green frontages to the adjoining properties. The entire frontage should be soft landscaped, incorporating tree cover on the private land, as elsewhere on Bromley Road.</p>
Culverley Green Residents Association	5 Potential Development Sites	Ravensbourne retail park	<p>Site 11 – Ravensbourne Retail Park – Options A and B</p> <p>CGRA has no objection to this site being identified for redevelopment, and agrees that this should be a residential-led mixed use, but considers that:</p> <p>The landscaped frontage to Bromley Road is a London Square, and was well designed as a formal tree-lined open space, reusing the original design of the railings from the Robinson's Jam Factory, as part of consultation discussions between the developer of the retail park and</p> <p>Page 6 of 7</p>

CGRA. The current arrangement is liked, and should not be compromised by any redevelopment.

Preserving the character and appearance of that landscaped space, which lies within the CGCA, includes avoiding creation of a new built frontage as close to the space as indicated on the Capacity Studies, and avoiding a height to the new frontage that would overly enclose and cast a shadow over the space during the afternoon; (it is not just the houses on the opposite side of Bromley Road that are a consideration).

There is no need for a green buffer between the site and the police station, but there is a need for a wide green buffer with public access along the entire frontage of the site to the river Ravensbourne.

The CGCA Character Appraisal identifies the view into this site from Newquay Road as a 'View', which should be respected in the layout proposed for the site – ie align the central axis of the site with Newquay Road, and create the new 'park' onto that axis, as an extension of the existing landscaped frontage to Bromley Road, so that it is evident that it would serve the wider community.

The maximum height of proposed buildings is excessive at 10 or 12 storeys, especially given that to the south, in Bellingham, where there is no heritage consideration, - eg Site 13, a maximum height of 6 storeys is proposed. CGRA are not proposing to specify the maximum height for Site 11, because this should be determined by consideration of the facts that the site lies within and in the setting of CGCA, along a section of Bromley Road where the predominant height is 2 storeys, with some 3 – 4 storey elements, and where it is essential to retain a sunny environment for the existing landscaped frontage, and for the proposed extension of this to the river. Careful design is required, but neither Option A nor B represent an acceptable response to the site considerations.

The large footprint blocks proposed are alien to the setting, changing an open site on the edge of a "leafy suburban residential area", to quote the A21 DF, which is typified by detached and semi-detached villas, into an estate of large footprint and relatively tall blocks of flats.

The site is large enough to include a mixture of houses as well as flats, which would enable a wider cross-section of the Catford community to be accommodated in the scheme. These could be well located fronting Bromley Road, to reflect the character of the CGCA. The design principle expressed in the A21 DF, to place taller buildings on Bromley Road, and step down behind, adjoining existing housing, is not relevant to this site, where taller buildings might be better suited further west from Bromley Road.

Culverley Green Residents Association	5 Potential Development Sites	Motor services/garage site	<p>Site 12 – Motor Services</p> <p>Once again, CGRA has no objection to this site being identified for redevelopment, but advises that: This site is within the CGCA, where predominant heights are 2, 2½ and 3 storeys. This needs to be respected, so as to preserve the character of the conservation area.</p> <p>A 6 storey building to the immediate west of the river Ravensbourne would overshadow it excessively, to the harm of its biodiversity;</p> <p>The appropriate height should be 3 storeys, with possibly a small 4 storey feature, subject to detailed design considerations. This would reflect the Fig 4 “Relevant Precedents” photo of Old Ford Road E3, given. In contrast, the taller building in Fig 5 at Wenlock Basin is clearly facing a much larger open body of water than the river Ravensbourne at this point.</p> <p>It is questioned whether this is an appropriate site for Class E or F accommodation, and thus it may be better to use the site solely for residential. As an example, a redevelopment next to the river adjoining Ladywell Road and the railway replaced a commercial office building with an entirely residential building, despite being close to Lewisham town centre.</p>
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Table 4: Existing and Potential TfL Projects for the A21

	TfL Project Location	Project Description	Status as provided by TfL	Change Proposed to the A21 Development Framework
1	Catford Town Centre	Major Project - gyratory removal	In feasibility in conjunction with developments	Already included.
2	A21 Molesworth Street j/w A20 Rennell Street	Safer Junction scheme to reduce road danger following analysis of collision patterns	Currently paused - at start up, but some traffic surveys done in conjunction with A20 Lee High Road bus lane enhancement	Included on Character Area Framework Strategy Map for the Lewisham Town Centre (South) and added to Public realm projects list in the “A distinctive public realm: Area based strategy”.

				The A20 has now been labelled on both of the Character Area Framework Maps.
3	A21 Lewisham to Catford	Reduction of speed limit to 20mph, temporary cycle lanes	Introduced on a temporary traffic order in 2020 under the London Streetspace programme, to be reviewed for making a permanent order	<p>Included as a recommendation of something to be explored further rather than a full recommendation as including this as a full recommendation would represent a significant change from what is stated in the consultation draft of the document.</p> <p>This recommendation has been located within the 'Emerging Transport Strategy'. The following bullet point has been added to the "Opportunities" sub-heading on page 142: <i>Explore the reduction of the speed limit to 20mph between Catford Town Centre and Lewisham Town Centre.</i></p>
4	A21 Lewisham High Street by Mount Pleasant Road	Provision of a new controlled crossing	In concept (preliminary) design, we consulted on a pedestrian crossing but are now proposing a Toucan crossing to provide better cycle connectivity across the A21 as well	Included on Character Area Framework Strategy Map for Lewisham Park, Hospital and Greens and added to Public realm projects list in the "A distinctive public realm: Area based strategy".
5	A21 Bromley Road by Crantock Road / retail park	Carriageway resurfacing arising from a Road Safety Audit of a previously implemented scheme	Currently paused - at start up	Has not been included as more of a maintenance project rather than a strategic project which is the type of project included in this document.
6	A21 Bromley Road j/w Beckenham Hill	Safer Junction scheme to reduce road danger following analysis of collision patterns	Currently paused - at start up	<p>This project was already included in the A21 Development Framework but the text has been altered on page 55 as follows to emphasise the importance of improving the connection from the A21 to Beckenham Place Park: Better crossing and frontages will strengthen the connections amenities on either side of <i>the road including with Beckenham Place Park to the south-west.</i></p>

7	Whole corridor	Bus Lane Hours of operation review to 'at any time'	Permanent Order being progressed following an experimental order to increase hours of operation in 2020	<p>Included as a recommendation of something to be explored further rather than a full recommendation as including this as a full recommendation would represent a significant change from what is stated in the consultation draft of the document.</p> <p>It is stated that this is being proposed for exploration following on from an experimental order that was introduced in 2020 in response to the covid pandemic.</p> <p>This recommendation will be located within the 'Emerging Transport Strategy'.</p> <p>The following bullet point has been added to the "Opportunities" sub-heading on page 142: <i>Explore changing the bus lane hours of operation to 'at any time' following the experimental order that was introduced in 2020 in response to the covid pandemic.</i></p>
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