



Your Ref:  
Our Ref: 12/0115

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Dear Mr Regan

## **Lewisham Site Allocations Development Plan Document**

Thank you for consulting (Transport for London) TfL on your Lewisham Site Allocations Development Plan Document (DPD) proposed submission. We have the following comments from a policy (accordance with London Plan) and transport operations perspective. A separate response will be provided from the TfL Consents team, from a land ownership perspective.

### **General Point**

TfL should be consulted when a development is close to a TfL asset or the Transport for London Road Network (TLRN) or Strategic Road Network (SRN). TfL is the highway authority for the TLRN, and is therefore concerned about any proposal which may affect the performance and/or safety of the TLRN. TfL also have a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN.

### **Paragraph 1.7**

It would be useful to list, perhaps as an appendix, sites included in the Lewisham and Catford town centres Area Action Plans.

### **Paragraph 1.29**

TfL supports the statement about protecting rail corridors for transport use. However this at odds with the proposal SINC 13 to designate New Cross and New Cross Gate rail sides as sites of importance for nature conservation. See below.

London Plan Policy 6.2 (Providing Public Transport Capacity and Safeguarding Land for Transport) identifies, and requires protection of, strategic transport schemes required to deliver the Plan that are likely to be progressed during the Plan period to 2031. Table 6.1(supported by Policy 6.4 Enhancing London's Transport Connectivity) identifies a southern extension to the Bakerloo Line

and a potential extension to the Docklands Light Railway southwards from Lewisham. Although it is premature to identify specific sites that may be required to allow these proposals to be delivered, as the impacts on subsequent iterations of the Site Allocations DPD could be significant, it would be appropriate to reference these projects here and that they may have significant implications for future reviews of the document.

**Site Ref: SA5, SA6, SA8 (b) and others adjacent to the London Overground (East London Line) railways**

There are a number of sites including residential and other sensitive uses which adjoin the London Overground (East London Lines) railway. Whilst TfL would not object to the principle of such development the design of any scheme should take account of the noise and other disturbance arising from the proximity of an operational railway. Development adjoining the railway should also comply with London Overground's infrastructure protection requirements.

If and when a development proposal comes forward on site SA6, TfL should be involved in particular to ensure design of new station entrance at New Cross Gate meets operational requirements and likewise that the bus stand/stops currently at the site is properly integrated with the station. The site allocation should refer specifically to retention and improvement of the bus stands and stops at the site.

**Site Ref SA12 and others - Local Employment Locations**

Transport uses should be added to the list of appropriate uses at those larger sites located on or close to major roads, more distant from residents and which have the potential for transport use such as bus garages, for example SA12, 13, 50. This to accord with London Plan policies 6.2 and 6.7 (Better Streets and Surface Transport)

**Site Ref: SA18 Forest Hill station and environs**

If and when this development proposal comes forward TfL should be involved in particular to ensure design of any new station or entrance and associated public realm meets operational requirements. Consideration could be given to the potential to improve interchange with buses.

**Site Ref: SA25 Former Bell Green gas works**

This site is designated as an 'out of centre' retail park. As such, the site allocation should make it clear that proposals should seek to reduce car dependency, improve public transport, cycling and walking access and promote more sustainable forms of development. This is to accord with London Plan Policy 4.7 (Retail and Town Centre Development).

**Brockley Cross Local Hub sites SA26 and SA27**

If and when development proposals comes forward TfL should be involved in particular to ensure design of any new station or entrance and associated

public realm meets operational requirements. Consideration could be given to the potential to improve interchange with buses.

### **SINC 13**

Prior to the designation of SINC 13 an assessment of the current nature conservation value of the land should be undertaken to take account of the impact of the London Overground (East London Line extension) works and the current Thameslink works. Much of the woodland referred to in the site allocations document no longer exists. As owners of the land concerned both Network Rail and TfL should be involved in this assessment.

Consideration could also be given to the designation of the Lewisham owned 'exchange' land at the southern end of Bridgehouse Meadows adjoining the phase 2 London Overground extension as a SINC, given the recorded presence of the Common Lizard.

### **Proposed deletion of C2 (Silwood Triangle)**

This site should be continue to be allocated for mixed railway operational, other transport, waste and B1, B2 and B8 uses. Whilst the railway has now been constructed, permanent development of the land has yet to take place.

I hope you find these comments useful and that you will consider them for incorporation into the final DPD.

Yours sincerely



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