

LOCAL DEVELOPMENT FRAMEWORK

## Lewisham Town Centre Area Action Plan

### **Further Options Report Consultation**

# Full representations and officer responses list

Jan 2012

Consultee	London Fire and Emergency Planning Authority		
Agent	Miss Mel Barlow-Graham of Dron & Wright		
Representations	1		
Representation 1		Officer Response	
Clause 4.6, Policy Options – Objecting			
Sub-area specific policies, Policy 4.6 (Ladywell Road		No change	
character area), Option 3 Our client considers designation		Option 3 has not been taken forward as	
of the Ladywell leisure centre site, or part thereof, for use		the preferred option and is therefore no	
as a gypsy and traveller site to be inappropriate.		longer included in the AAP at the	
		proposed submission stage.	

Consultee	Barclays Bank Plc
Agent	Michael Fearn of Shire Consulting
Representations	1

Representation 1	Officer Response
LTC SH5 – Objecting The LTCAAPFO sets out the Council's aspiration to improve the attraction of Lewisham town centre as a destination and enhance its vitality and viability (Objective 1 Section 2.4) but then proceeds to promote a restrictive policy LTC SH5 that "strongly resists any change of use involving the loss at ground floor level of Class A1 shops". This first statement takes no account of the type of user involved and does not consider that some non-A1 traders make a considerable contribution to footfall in a manner that Class A1 traders do not. Draft Policy LTC SH5 merely seeks to continue the UDP's stance towards non-A1 uses which derives from very outmoded and discredited thinking that all non-shop uses, such as banks, detract from the vitality and viability of town centres. The Council's intention to seek to attract private sector investment in town centres does not sit well with any continuation of previous policies seeking to limit certain Part A uses in primary shopping frontages. As drafted Policy LTC SH5 (and for that matter	Reject objection The AAP vision seeks to achieve Metropolitan town centre status. In order to do so, comparison retail provision requires protection and expansion. The retail and frontage policies in the AAP provide this protection. Further, officers consider that the NLP Retail Capacity Study (including the Addendum of 23 Sept 2010) comprehensively provides the evidence base for the AAP approach to shopping frontages.

LTC SH6 affecting the "Secondary Shopping Areas") would prevent a successful non-shop use expanding into an adjacent premises, even though on some occasions this is the most sensible use of resources.

Furthermore, the draft Policy seeks to impose arbitrary limits upon the levels of representation by Part A operators without any evidence as to why those levels have been adopted and more importantly what the existing levels might currently be (there is nothing within the NLP Retail Capacity Study of November 2009, for instance, that would support these percentages). The implication that only A1 uses are appropriate derives from very outmoded and discredited thinking that other uses such as A2 detract from the vitality and viability of town centres. By definition, uses that fall within Part A of the Use Classes Order are appropriate in town centres as they are "shopping area uses" and are acceptable without any need for restriction or qualification. A review of any evidence about the effectiveness of such policies is fundamental to whether the Council's approach is sound. Given the acknowledged benefit of A2 uses in fostering significant footfall and pedestrian activity (see (paragraph A.13 of the NLP Retail Study which describes the Bank as being one of the "key retailers") the Bank would urge the Council to move away from the type of restrictive policies promoted in the outdated UDP. The Bank is concerned that the outdated approach in the UDP should not be continued in the emerging LDF as this is also likely to work against the Council's, and the Government's, objective of promoting a wide range of activities to return vitality and viability to town centres. In fact there is nothing in Government policy that recommends or supports imposing an embargo upon acceptable town centre uses at all. Furthermore, policy which seeks to limit certain Part A uses in the primary frontage undermines the Council's intention to attract private sector investment in the town centre. The Bank believes that there is no good planning reason to restrict the presence of banks at ground floor level in 'primary' shopping frontages and that the Council should recognise the important contribution of financial services such as banks in both bringing investment and acting as attractors for investment by others, in the wording and application of policies in all the relevant LDF

documents. In our previous representations we also noted that keeping significant generators of footfall out of primary frontages will actively work against the achievement of the Council's strategic objectives and is inconsistent with national policy. The production of the LDF should provide the opportunity to examine proper evidence and to revise out-of-date planning policy, particularly if it is not consistent with national policy. The Bank therefore objects to Policy LTC SH5 as the Council has provided no evidence to justify its continued restriction of financial service retailers such as the Bank in primary frontages and has not given consideration to reasonable alternative strategies. Banks, as acceptable town centre uses, will contribute significantly to the vitality and viability of Lewisham's shopping centres thus fulfilling the objectives of the Government and the Council. Vibrant centres depend upon major financial investment by private sector stakeholders. The Bank believes that improvements to shopping provision should be matched by commensurate improvements to financial service retailing. There would be considerable benefit to shopping centres in seeking to attract A2 users such as Banks who provide a high level of investment in, and maintenance of, their premises resulting in active and attractive street frontages and who also foster significant footfall and pedestrian activity. Finally, on the matter of the validity of the evidence base, the NLP Retail Capacity Study of November 2009 appears to be the basis for the retail policies but that Study did not consider the detail of designated shopping frontages, which appear to be broadly the same as those in the UDP. Indicators such as rents, yields and pedestrian flows change over time as new floorspace is added to town centres so if the Council

Consultee	Gill Phillips	
Agent		
Representations	1	
Representation 1		Officer Response

Paragraph 1.2.3 – Commenting	
I think you need to give wider consideration to the following	Comments are noted
matters: (1) making the town centre completely traffic free	
between say the hours of 9 and 6.00 - including buses - the	
number of buses that clog up the high street is excessive	
and dangerous to pedestrians (2) not building any more	
offices - the town centre seems littered with empty business	
space (3) putting a hold on high rise residential building	
which is ruing the eye line of the area and re-examining the	
priority and importance of not filling every open space with	
high rise blocks (4) improving cycling access to and from	
the town centre - if you cycle from ladywell you end up at	
the back of the centre - there is no legitimate way of getting	
across to the high street / lee high road from there without	
cycling on the pavement / having to cross the very	
dangerous entrance / exit to the multi storey car park (5)	
improving bicycle parking in and around the centre	

Consultee	Adina Brown of English Horitage		
	Adina Brown of English Heritage		
Agent			
Representations	10		
Representation 1		Officer Response	
Page 14 – Commenti	ng		
English Heritage notes that conserving local heritage assets has been identified as a key issue that needs to be tackled (pg 19), however the vision and objectives for the AAP does not currently aim to address this.		The vision and objectives have been amended to reflect the importance of heritage assets.	
Representation 2		Officer Response	
Page 23 – Objecting			
It is disappointing there are no area-wide spatial polices for local heritage assets in the area, particularly given the concentration of assets to the south of the AAP area and surrounding conservation areas. As highlighted in PPS5, it is important to provide a positive, proactive strategy for the conservation and enjoyment of the historic environment.		A new policy (LAAP23 Heritage Assets) has been added to the AAP Proposed Submission Version area- wide policies to provide for local heritage assets.	

Officer Response

Representation 3

Page 34 – Objecting Impacts and relationships between the town centre and its hinterland, including the surrounding conservation areas, also need to be considered in the AAP despite the amendment to the boundary.	Adjustments to policy supporting text to accommodate.
Representation 4	Officer Response
Page 36 – Objecting We note that the key issue identified at Issues and Options stage related to the approach to the location and design of tall buildings. Unfortunately, our records do not show that we were consulted at the Issues and Options stage. We do not support the approach in this consultation, which does not provide any greater clarity on tall buildings policy in the Lewisham town centre. I understand that CS Policy 18 of the Lewisham Core Strategy includes a tall buildings policy and that the Lewisham Tall Buildings Study identifies Lewisham Town Centre as a location for tall buildings. Within this location the Study identifies further details of areas which may be appropriate, inappropriate or sensitive to tall buildings. We would suggest that this information is reflected in the AAP to ensure a robust plan-led approach to tall buildings in Lewisham town centre. Any urban design and assessment issues, specific to the AAP area, which should be used in considering tall buildings proposals should also be highlighted for greater transparency. This	A new policy (LAAP19 Tall Buildings) has been added to the AAP Proposed Submission Version area-wide policies to provide for tall buildings in the town centre.
includes detailed consideration of the historic environment and the significance of heritage assets in the AAP area.	
Representation 5	Officer Response
Page 54 – Commenting New Policy 1 CO2 Emission Reduction LB of Lewisham may wish to consider how this will be promoted through existing building stock.	Noted
Representation 6	Officer Response
Figure 8 – Commenting Archaeology priority areas may also be present in the AAP area.	Noted
Representation 7	Officer Response

General Figures – Commenting On an editorial note, it is not possible to view the conservation area boundaries on many of the maps (despite it being on the key).	Noted and amended
Representation 8	Officer Response
Site Specific Policy 1.1: Kings Hall Mews – Supporting Kings Hall Mews. We support the statements made about the need to respect the sensitive historic context of this site.	Noted
Representation 9	Officer Response
Loampit Vale Character Area – Commenting In relation to the listed Lewisham Bridge Primary School, English Heritage has published a range of guidance on historic school buildings which you may find useful when considering design options http://www.helm.org.uk/server/show/nav.19652/	Noted
Representation 10	Officer Response
Character Area Policy 5: Ladywell Road – Supporting / commenting	
English Heritage supports the key principle to conserve and enhance the heritage assets in the area through sensitive development and environmental improvement. Further emphasis could also be placed on setting and views, as well as enjoyment through better access or interpretation.	The support is noted. The comment is addressed through a new area-wide Heritage Policy (LAAP23) included in the Proposed Submission version of the AAP.

Consultee	Carmelle Bell for Thames Water		
Agent			
Representations	5		
Representation 1		Officer Response	
General comments			
Flooding & Surface Water Management Strategy			
In relation to flooding, Thames Water consider that guidance should		No change	
be provided in the AAP in relation to flooding from sewers as pluvial		Flooding is covered borough-	
flooding is particularly significant in urban areas. PPS25: Development and Flood Risk states at paragraph 14 that a sequential		wide in the Core Strategy and	
approach should be used by local planning authorities in areas to be		the Council is undertaking work to produce a Surface	

lists the forms of flooding and now includes: ""Flooding from Sewers"". The guidance should therefore include reference to sewer flooding and an acceptance that flooding could occur away from the flood plain as a result of development where off site infrastructure is not in place ahead of development. It is vital that sewerage/waste water treatment infrastructure is in place ahead of development if sewer flooding issues are to be avoided. It is also important not to under estimate the time required to deliver necessary infrastructure, for example: - local network upgrades take around 18 months -	Water Management Plan and SUDS guidance for the borough separately. Additional guidance is provided in the AAP for local specific and town centre circumstances.
sewage treatment works upgrades can take 3-5 years This therefore increases the importance for Thames Water's proposed text below, regarding water/sewerage infrastructure, to be taken into account. Thames Water support the use of sustainable drainage systems in appropriate circumstances. However, it should also be recognised that sustainable drainage systems are not appropriate for use in all areas, for example areas with high ground water levels or clay soils which do not allow free drainage. A well maintained and managed sustainable drainage system is also required to prevent it becoming ineffective, potentially increasing overland flows, and consequently having an impact on the sewerage network.	
Representation 2	Officer Response
General comments	
Water and Sewerage Infrastructure A key sustainability objective for the preparation of the new Local	No change This is a borough-wide

4A.16 of the London Plan relates to water supplies and states: "The Mayor will work in partnership with appropriate agencies within London and adjoining LPAs to protect and conserve water supplies and water resources in order to secure London's needs in a sustainable manner by supporting the Water Strategy and by." Policy 4A.17 of the London Plan relates to water quality and states: "The Mayor will, and boroughs should, protect and improve water quality to ensure the Blue Ribbon Network is healthy, attractive and offers a valuable series of habitats by: • ensuring adequate sewerage infrastructure capacity is available for developments....." It is unclear at this stage what the net increase in demand on our infrastructure will be as a result of the proposed development. However, the AAP needs to consider the net increase in water and waste water demand to serve the development and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided. The list of issues covered in the AAP should therefore make reference to the provision of water and sewerage infrastructure to service development. This is essential to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems. To accord with PPS12 and the London Plan text along the lines of the following section should be added to the AAP:

#### "Water Supply & Sewerage Infrastructure

It is essential that developers demonstrate that adequate water supply and sewerage infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water authority to agree what improvements are required and how they will be funded prior to any occupation of the development. Further information for Developers on water/sewerage infrastructure can be found on Thames Water's website at:

http://www.thameswater.co.uk/cps/rde/xchg/corp/hs.xsl/558.htm Or contact can be made with Thames Water Developer Services By post

at: Thames Water Developer Services, Reading Mailroom, Rose Kiln Court, Rose Kiln Lane, Reading RG2 0BY; By telephone on: 0845 850 2777; Or by email: <u>developer.services@thameswater.co.uk</u> "	
Representation 3	Officer Response
General comment	
Tree Strategy and Planting – Thames Water recognises the environmental benefits of trees and encourages the planting of them. However, the indiscriminate planting of trees and shrubs can cause serious damage to the public sewerage system and water supply infrastructure. In order for the public sewers and water supply network to operate satisfactorily, trees, and shrubs should not be planted over the route of the sewers or water pipes.	Noted
Representation 4	Officer Response
General comment Access – Thames Water will require 24 hour vehicular access to any pedestrianised area to undertake emergency works. Access to the sewerage and water supply infrastructure must not be impeded by street furniture. This will enable Thames Water to operate the network with as little interruption to the service as is possible.	Noted
Representation 5	Officer Response
General comment Catering Establishments – Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. We further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel.	Noted

Consultee	David Roach of GVA Grimley	
Agent	Tesco	
Representations	2	
Representation 1		Officer Response
Character Area Policy 3: Conington Road Area And Site		

Specific Policy 3.1: Tesco block and car park land - Supporting As you may be aware, my clients have been in on-going discussions with the Council since 2004 regarding the comprehensive redevelopment of the Tesco Conington Road site. We are very encouraged to see that the emerging policy position set out in Character Area Policy 3 and Specific Policy 3.1 regarding the Conington Road area and Tesco site largely reflects the very positive discussions we have had with the Council's Planning Officers. We feel that the emerging policy better reflects an achievable scale and mix of development than that set out in the previous Preferred Options draft of the AAP. We support the emerging policy aspirations for the wider character area and in particular the policy focus for the Tesco block and car park sites. We fully support the Council's flexible policy approach to the future redevelopment of the existing surface car parks, recognising that at this stage it is not yet known what viable and appropriate form of development, whether that be residential, hotel or car parking, can be delivered on these sites in a way that meets the wider policy objectives.	Support noted
Representation 2	Officer Response
Character Area Policy 3: Conington Road Area And Site Specific Policy 3.1: Tesco block and car park land - Objecting We request that the emerging policy framework set out in Specific Policy 3.1 includes the potential for the Tesco store extension to accommodate additional comparison retail floorspace to meet local need, as identified in the Retail Capacity Study 2009, subject of course to meeting the policy tests set out in PPS4 and being consistent with other policy objectives in the emerging AAP. Tesco is keen to enhance the store experience and meet the growing requirements of its customers and its catchment. We are currently in the process of preparing an evidence base to demonstrate the appropriateness and acceptability of increasing the level of comparison retail floorspace within	In the Proposed Submission Version of the AAP, Policy LAAP5 Conington Road Town Centre Area contains the indicative capacity for a further 3,000 sqm of retail in the Town Centre Area.

an extended store; demonstrating that such floorspace can	
help to achieve the wider aspirations for Lewisham town	
centre as a shopping destination.	

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#### Representation 1

#### General – Objecting

All of the AAP which involver high rise developments in theThurson Road, Lompit area and the roundabout by Lewisham Station. Although I'm outside of your date for written objections, I still want to write and object to this inappropriate building project centred on Thurston Road Industrial estate. I have been a long-time and vocal objector to all of the plans surrounding the redevelopment of Lewisham Centre and your Area Action Plan. This is just another example of an inappropriate scheme. My main objection is to the high-rise nature of these developments. 24 stories in Loampit vale. 17 at Thurston road, this will turn parts of Loampit vale into a canyon and remove the view across the vale. It will also create a wind tunnel effect down parts of the vale in certain weather conditions. Why do you see the need to persist with these environment-blighting towers at all? As I have said many times. We do not want to turn Lewisham into Croydon. You seem to be intent on this why? The answer to my own question is undoubtedly greed, both yours and the developers!

There have been many public voices complaining of these developments but you choose to ignore all our protests and opinions and proceed despite anything we might say. This makes any protests we might make, redundant. Any consultation you do is just going through the motions, since you have no intention of actually listening and responding to our concerns. Over the last few years there have been and are many many developments, both small and large, where developers are building or have built hundreds /

#### Officer Response

#### No change

Officers consider the density of development is supported by national and regional policy. A tall buildings policy (LAAP19) has been added to the AAP Proposed Submission Version to support the management of building height.

The Retail Capacity Study evidence base document assures officers that the transport system is adequate for the development proposed.

thousands of apartments and flats all round the borough. Do you think an already overcrowded transport system, particularly the railway, will be able to cope with such a large local population rise, let alone the other expansion in public services which we will undoubtedly need?	
Representation 2	Officer Response
General – Objecting Why are you reducing the size of the playground at Lewisham Bridge School, our children are already obese	No Change
and need all the exercise they can get! I was a governor at this school and was one of the people who gave the go ahead to build a large and well appointed play area which you, in your great wisdom have just destroyed! The Thurston road site would have made a good spot for a new school, rather than overcrowding an existing primary school, which could have been expanded to meet the growing demand for primary school places in Lewisham!	The redevelopment of the former Lewisham Bridge School is underway and therefore no plans are included for this site in the AAP Proposed Submission Version.
Representation 3	Officer Response
General - Comments I walk down the streets in Lewisham and don't hear an English voices at all. All I hear are Eastern European languages. I am not trying to be prejudiced against foreign peoples/workers, its just being pragmatic and saying what I see and hear. So who exactly are you building all this accommodation for? Whilst I'm on the subject, I'm missing the art deco style factory in Ladwell which was demolished recently why? The Segar Distillery was mostly demolished for another high rise tower, why for gods sake it was a fine building! Removing all our character period buildings and replacing them with high-rise towers will actually make the built environment worse! Do you not see this!!!! Why do you not try to improve Lewisham by planning well designed people-friendly spaces that people can enjoy. This is thew way to attract more visitors and business to Lewisham, rather that building on every square cm that you can!. Public art, fountains, Public spaces, Public sculpture, well designed and landscaped areas, good views which do not block out the sun and the sky! Look at the developments in Bilbao Spain if you want a good example of what can be done to make an urban environment a pleasure to live in!	Comments noted

Get a known and famous architect to design us one or two	
landmark buildings which everyone would be proud of and	
want to come and see! Not a cluster of autonomous high-	
rise towers blotting out the sun! Come on Lewisham	
Planning department get a grip and do something that will	
make us all proud of you for once!	

Consultee	Eoin O'Connor for TP Bennett LLP	
Agent		
Representations	1	
Depresentation 4		Officer Decreases
Representation 1		Officer Response
Site Specific Policy 2. Jerrard Street - Object I am writing on behalf owners of 66-76 Loan Loampit Vale and Jerr the location plan and diagrams/ masterplan Plan (TCAAP). The key on is the 'Preferred op accompanying figures East of Jerrard Street sections will impact up as such we cannot su figures. Policy 2.1 rec which is endorsed by Jerrard Street and its masterplan identified clients site are princip generous tree lined po- seeks a dedicated bu into Jerrard Street wh set back to facilitate th aim of the Council to which is endorsed by unachievable and is lit	1: Loampit Vale North - East of tring of Trademark homes who are the npit Vale, located on the corner of rard Street. I have attached a copy of where, approximately, it relates to the is within the Town Centre Area Action ey matter which we wish to comment of Site Specific Policy 2.1' and the s which relate to Loampit Vale North – . The proposal as set out in these pon the integrity of my client's site and pport the policy or accompanying juires a comprehensive masterplan landowners for the land east of surrounds. The principles of the in the policy which will blight my le 2 which seeks the creation of a avement (6-8m) and principle 6 which is lane for turning from Loampit Vale ich may require building lines to be he necessary depth of pavement. The have a comprehensive masterplan the landowners is at present kely to blight the entire Action Area. of how the council will assist in the	No change Officers disagree that this causes damage to the site and that the comprehensive redevelopment of this Town Centre Area will require the environmental changes and masterplanning approach outlined in the AAP.

compulsory purchase land to achieve their aims ,and	
there is at present no mechanism by which such a	
Masterplan could be achieved. The figures which show the	
council's vision of how land east of Jerrard Street should be	
developed will blight my client's site and it is considered	
that a more conceptual diagram and less prescriptive site	
specific policy aims would have been appropriate at this	
stage. In summary we wish to object to the figures showing	
the likely layout of development at Loampit Vale North –	
East of Jerrard Street and principle 2 and 6 of Policy 2.1 as	
they will lead to a form of development which will not be	
endorsed by the land owner of 66 -76 Loampit Vale and is	
likely to be unachievable.	

Consultee	Faith Smith	
Agent		
Representations	1	
Representation 1		Officer Response

Representation 1	Officer Response
Site specific policy 5.1: Ladywell Leisure Centre Site – Commenting I Have been a resident in Lewisham for the past 27 Years, I Would like to ask that when looking at the Planning Applications for the Ladywell Leisure Centre Site, You take into account the views of local people. I would like to see the site used to house a cinema, and perhaps a place to	Comments noted. Officers, landowners, developers and other stakeholders are working together on a number of sites in the heart of the town centre, seeking to provide a cinema in
eat, chill and get together. Years ago we had The Odeon in Lewisham and Studio 6 & 7. also we had The ABC in Catford. To bring the community together in this way would go a long way towards reducing Anti Social Behaviour, I Am sure there would also be a reduction in the local unemployment figures !!	Lewisham. Further details will be provided when they become available.

Consultee	Miss Rachael Bust	
Agent	The Coal Authority	
Representations	1	
Representation 1		Officer Response

General Comments	
Having reviewed your document, I confirm that we have no	Noted
specific comments to make on this document at this stage.	

Consultee	Mr Geoffrey Thurley	
Agent	Committee member of the Ladywell Society	
Representations	6	
Depresentation 4		Officer Decreases
Representation 1		Officer Response
4.3 Loampit Vale character area Preamble page 73 – Commenting		
Mention is made of "excellent public transport accessibility", which is the case, but "transport capacity" is more pertinent. Usage of Lewisham station increased from 5,840,937 in 2006/07 to 6,370,900 in 2009/1009 (Entries and Exits; Office of Rail Regulation figures), without any major building developments taking place. Passengers complain of overcrowding on the trains and buses during extended peak times.		Comments noted – no change to AAP
Representation 2		Officer Response
SSP2.1 Loampit Vale Commenting	North - east of Jerrard Street –	
This policy, and the accompanying Fig 12, implies that the row of Victorian buildings on Loampit Vale will be demolished. These buildings show the scale which is acceptable and are compatible with an amendment in the Draft Revised London Plan (Policy 7.4B) which states "Buildings, streets and open spaces should provide a high quality design response that (c) is human in scale, ensuring a positive relationship with street level activity and people feel comfortable in their surroundings."		Comments noted – See introduction of a Tall Buildings Policy (LAAP19) to the Proposed Submission Version
Although Lewisham Town Centre has been declared as suitable for tall buildings, there appears to be no constraint on filling this space with such structures. Suggested addition to 3. Taller elements of new development should address Loampit Vale, but there		
should not be a presumption that competing tall buildings are acceptable.		

Representation 3	Officer Response
SSP2.2 Loampit Vale North - west of Jerrard Street – Commenting	
1. refers to Lewisham Gateway "to the west"; should not this be "to the east"?	Noted and amended.
2. is the "new publicly accessible open space being created to the south of Loampit Vale" the existing Cornmill Gardens? Apart from being across the busy main road from the development, it is also the "accessible open space" for the existing residents of the River Mill estate, and the new residents of Loampit Vale South as well as the out-of- school hours recreation area for the 800 students at the Prendergast Vale school. Residents in the Gateway development are likely to gravitate towards Cornmill Gardens also.	This relates to the small pockets of open space / plaza space created in between the buildings to the couth of Loampit Vale. The approach in the Proposed Submission Version has been reworded to assist clarity.
Representation 4	Officer Response
LTC COM3 Reference to Ladywell Leisure Centre – Objecting Ladywell Leisure Centre. Closure of this facility cannot be justified. The Lewisham Infrastructure Delivery Plan indicates that there will be a shortfall of 600m <sup>2</sup> of swimming space by 2026, given the expected growth in population, if the current provision of 12.63m <sup>2</sup> per head of population is to be maintained. Ladywell Leisure Centre constitutes 572.8m <sup>2</sup> . Given the increase in population (over 4000) in the current Gateway, Loampit Vale and Thurston Road developments, plus extra population from any further development and the attraction of a new facility to the wider population, it could be reasonably expected that the Loampit Vale Leisure Centre would soon reach capacity. Ladywell Leisure Centre would be required for the "overspill".	No change. The leisure facility under construction in Loampit Vale is a replacement facility for the aging Ladywell Leisure Centre. Future need for leisure provision will be monitored and a strategy input on a borough-wide basis. Officers consider the Ladywell Leisure Centre as a future development site.
Representation 5	Officer Response
Character Area policy 5 – Commenting With its several listed and historic buildings, it is hoped that the recognition of this section of Lewisham High Street and Ladywell Road (the historic centre of the original Lewisham) as a special area will afford it some degree of sympathetic treatment and protection.	Comments noted.

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Whitburn
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Officer Response
include No change.
the Officers consider the retail capacity
closure work undertaken for this site is sound
and that therefore the Proposed
Submission Version of the AAP
ect the includes a policy for up to 1,400sqm of
retail provision.
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centre. It
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viable.
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d there. geographical basis than the town
corical centre and provision has been
identified elsewhere by the education
haracter department to support the growth of the
ley Road. yay art of g parade. store, ants and throom oined by Whitburn ect theOfficer ResponseInclude the oclosureNo change. Officers consider the retail capacity work undertaken for this site is sound and that therefore the Proposed Submission Version of the AAP includes a policy for up to 1,400sqm of retail provision.200m² centre. It serious. viable.Officers, landowners, developers and other stakeholders are working together on a number of sites in the heart of the town centre, seeking to provide a cinema in Lewisham. Further details will be provided when they become available. Primary school provision is dealt with on a wider geographical basis than the town centre and provision has been identified elsewhere by the education

Area Policy 5.	town centre.

Consultee	Mr Liam Henderson	
Agent	Transport Planner Docklands Light Railway	
Representations	1	
Representation 1		Officer Response
General Comments		
The Area Action Plan	should incorporate provisions for	Comments noted.
future major transport schemes. The DLR is actively		
considering an extension to the network from Lewisham to		
Forest Hill: This extension would travel on viaduct from		
Lewisham station south along the A21; therefore,		
consideration should be made as to how this future		
infrastructure would b	e incorporated into the Town Centre	
plans.		

Consultee	Mr Massimiliano Calo
Agent	
Representations	1

Representation 1	Officer Response
Site Specific Policy 5.1 Ladywell Leisure Centre Site – Commenting I'm writing with regard to the consultation about the town centre developments and specifically about the Ladywell Leisure Centre site which I believe is the perfect candidate for a cinema for Lewisham for the following reasons: Strategic location for accessibility The site is easily accessible by most Lewisham residents. It is in walking distance of many living in Lewisham, Catford, Lee, Hither Green, Rushey Green or Brockley and is very well served by buses coming from all directions. For these reasons a cinema it can be argued that a cinema there would result in less traffic congestion for the Borough's road network than it would be generated by one at the Gateway development.	Comments noted. Officers, landowners, developers and other stakeholders are working together on a number of sites in the heart of the town centre, seeking to provide a cinema in Lewisham. Further details will be provided when they become available.

It also has its own car park that would be easy to retain as part of a redevelopment of the site, even if underground and built upon. Strategic location for business A cinema there rather than at the Lewisham Gateway would suffer less from the competition of the nearest existing cinema at Greenwich and because of its location halfway between Lewisham and Catford it will draw visitors from a larger pool of usage to sustein it as a business for the long term. This is a much more attractive option for interested cinema operators than the Gateway site. Adequate Size With a front pavement the size of a piazza, a large unused garden hidden to one side and the car park at the back the site has a very large footfall indeed and is capable of hosting a truly substantial multiplex cinema as well as other components like housing and retail besides. There aren't other sites so centrally located that offer such space, and cinemas need space. Available soon The Ladywell Pool site has a very certain date for availability for redevelopment at the end of 2013. This proximity and certainty of the date of availability of the site means that a crucial element for the success of Lewisham as a destination could be in place much earlier and with greater certainty than with other options. A living building for the area The site is currently occupied by a 'living' building, a community asset that's a destination for scores of people throughout the day, seven days a week. This has a noticeable effect on the nature of that stretch of Lewisham High Street, especially from the point of view of safety. Ideally a replacement for the Ladywell Leisure Centre would retain that nature. The people of Lewisham already have the habit to go there for leisure purposes, and this is another consideration that's relevant to the ambition to keep it in that type of use. Strenghtening both Lewisham and Catford Lewisham and Catford town centres are very near, in fact they are the two town centres that in the whole of London are closest to each other. They are also connected through an important road with exceptionally wide pavements that has the potential to become a very attractive promenade integrating the two town centres, but to succesfully grow in that direction it needs more high profile destinations. A cinema would be a perfect establishment to make that area grow and be of benefit to both Lewisham and Catford town centres.

Consultee	Mr Michael Harris	
Agent		
Representations	3	
Representation 1		Officer Response
I'd like to add my nam that local support for a	/ 5: Ladywell Road – Commenting ne to the submission below and ask a cinema on this site is given due nsultation. In the final report I would submission.	Comments noted. Officers, landowners, developers and other stakeholders are working together on a number of sites in the heart of the town centre, seeking to provide a cinema in Lewisham. Further details will be provided when they become available.
Representation 2		Officer Response
Character Area Policy 3: Conington Road – Supporting I'd also like to strongly support the inclusion of new links from the Town Centre and railway station through to Conington Road, and from the Gateway Site through to the Loampit Vale site.		Support noted
Representation 3		Officer Response
Objecting As for the Ladywell B needs to be made that centres of Lewisham borough. I would like civic space, in this are area on which the Lad to the one of the origi divided from the form high priority for this and friendly to encourage sense of locality betw current site of the Leis This includes urgent a the turning with Court	haracter Area – Commenting / aths site (clocktower) - more reference at this is one of the historic civic and is a much neglected part of the consideration to be given to a new ea. My comments on this are: The dywell Leisure Centre now sits is close nal centres of our borough. The site is er Ladywell Baths site by the A21. A rea is making it more pedestrian local shopping and create a greater een the Ladywell Road and the sure Centre. action needed to prevent accidents at hill Road. A coherent vision for this e number of turnings off the A21 and	Comments noted. Increased reference to the former Ladywell Baths (The Playtower?) is included in the Proposed Submission Version of the AAP. Also in the Proposed Submission Version, Policy LAAP7 includes encouragement of a number of environmental improvements for the Ladywell Town centre Area, while LAAP21 identifies Lewisham High Street around Courthill Road as an opportunity to improve the pedestrian and cycling experience.

increase the number of pedestrian crossings. There is also
the desperate need for more civic space - at present, in
front of the Leisure Centre is a large open space which
could if connected across to the Ladywell Road with better
pedestrian crossings create a decent civic space.

Consultee	Mrs June Broome	
Agent		
Representations	4	
Representation 1		Officer Response
I am puzzled by the re	v 5: Ladywell Road – Commenting eferences to the once proposed ex Watergate school site. I	No change. Comments noted.
understood that the proposal was abandoned because the site did not comply with government policy for Travellers sites due to very poor access. Why is it now being considered again and short listed as a possible site? It should be used for affordable family housing which Lewisham desperately needs.		
Representation 2		Officer Response
It is unclear what "Inv means. When the dev (Adhesive Specialists it was suggested that but of course it canno to the channel of the I river there is no room road to 55 & 57 Ladyv has been going on for involves the east side	v 5: Ladywell Road – Commenting esting in the Waterlink Initiative" velopment of the old laundry site ) was being considered, at one stage the path should go through that site, t go further as the railway is too close Ravensbourne. On the east side of the between the river and the access well Rd. Discussion of this problem r many years and any solution that of the river would mean the loss of a g forest trees (protected, as they are, rea).	No change. Comments noted.
Representation 3		Officer Response
I strongly support Key	<ul> <li>5: Ladywell Road – Supporting</li> <li>Principle 1 - to conserve and</li> <li>ets etc. I welcome the proposal to</li> </ul>	Support noted.

support efforts being made to bring the old Ladywell Baths (Playtower) back into community use. The area is sadly lacking in such facilities. It is nationally listed and on the English Heritage register of buildings at risk. It is a very important element of the street and the Conservation Area.	
Representation 4	Officer Response
Site Specific Policy 5.1: Ladywell Leisure Centre – Objecting I am dubious that retail units will flourish on the Ladywell Leisure Centre site. The area is on the wrong side of Lewisham High Street and no shops have been successful in this stretch between the railway bridge and the far side of Lewisham Park. I have watched them for the last 62 years and have seen them all go one by one. A medium sized Tesco is now being opened on the opposite side of the road near the railway and it will more than cater for local needs. Another supermarket will be surplus to requirements.	No change. The leisure facility under construction in Loampit Vale is a replacement facility for the aging Ladywell Leisure Centre. Future need for leisure provision will be monitored and a strategy input on a borough-wide basis. Officers consider the Ladywell Leisure Centre as a future development site.

Consultee	Mrs Susan Gore
Agent	
Representations	6

Representation 1	Officer Response
Page 23 – Objecting and commenting	
Add OPEN SPACES to the list of specific POLICIES. There appears to be no specific policy unless LTC URB5 - URBAN ENCLOSURE, GRAIN is gobblydegook for this. Are 'PUBLIC SPACES' to be taken as the same as OPEN SPACES? Only the maps indicate open spaces as such eg Fig 4 but these are not so specific as an actual stated policy.	In the Proposed Submission Version of the AAP, Policy LAAP18 concerns public realm which incorporates both hard and green public spaces. The Core Strategy also supports open space (green) through policy CSP12.
Representation 2	Officer Response
General objecting and commenting	
This consultation process is flawed - although I understand the constraints of time placed by the length and time of the  Lewisham AAP consultation process. The Loampit Vale	No change. Comments are noted. Planning Development Management officers

residential towers with leisure centre and the Connington	encourage developers to consult local
Road residential developments and Lewisham Bridge	residents regarding all major
School are all being built at this moment and there is outline	developments and this will continue to
planning permission for the Gateway character area. Each	be the case. The Loampit Vale
was done as an individual planning application with no	(Renaissance) and Conington Road
consultation on or reference to the cumulative effects of all	developments included public
of them together on the Lewisham Town Centre or its	consultation undertaken by the
surrounding areas. Remember the Centre is in a valley	developers.
overlooked round 360 degrees by the surrounding areas.	
The environmental and living conditions - including	
education and housing - are not going to be improved.	
Lewisham Bridge School is already hemmed in by Loampit	
tower blocks and the recent developments around Cornmill	
Gardens are hemmed in by both already. All will be even	
more swamped if and when the Gateway tower blocks are	
built. Therefore before specific planning applications go in	
for the Gateway development and In view of the cumulative	
impact of these developments, an addition should be made	
to the NEW POLICY 3 to consult all residents in and	
surrounding the Loampit Vale Character area on its effects	
on their living, environmental and visual conditions. The	
following should be included.	
* Residents of the actual Towers - for fresh views especially	
as the flats have been advertised abroad as well as those	
taken off the current Lewisham housing list.	
* Residents of the housing around Cornwill Gardens and	
the River.	
* Parents, pupils and staff etc of Lewisham Bridge School	
* Residents of the surrounding area overlooking and close	
to these developments. The Loampit Vale Tower blocks	
due to be completed in June 2011. This is conveniently (for	
political purposes) or inconveniently (for efficiency) just after	
the end of this consultation period. It should also be	
ADDED LTC IMP1 on MONITORING.	
Representation 3	Officer Response
2.2.1 Key Issues - Economy – Supporting	
As Bromley, Central London, Canary Wharf, Croydon are	Noted.
established and very easily accessible due to the public	
transport, a similar centre with the usual multiples and	

difficulty now against Blue Water because of the free and extensive/easy parking facilities in the latter. The market is at present one of Lewisham's major assets.	
Representation 4	Officer Response
LTC-IMP1 - MONITORING – Commenting Addition Monitor the impact of the Loampit Vale residential development on the centre and surrounding areas before submitting specific planning proposals/applications for the Gateway development including public consultation with the immediate and surrounding communities.	Comments noted. Full monitoring framework is included as part of the Proposed Submission Version of the AAP (see Appendix 3).
Representation 5	Officer Response
LTC URB7 ENHANCING LEWISHAM'S WATERWAYS – Supporting and commenting In conjunction with this, the Waterlink Way should go through the underused park to the side and behind the Riverside House - Citibank Building - by the river to make this space more secure for users and this space should be improved, especially with the loss of open space in the Gateway and Loampit Vale developments.	Comments and support noted.
Representation 6	Officer Response
General support and comments The Lewisham Market is one of the major assets of Lewisham at present and conditions and costs should not be changed so that stall traders or customers are not driven away. Using the space in the evening would hopefully mean that Lewisham Centre was not dead at this time as it is at the moment.	Comments and support noted.

Consultee	Ms Caroline Cupitt	
Agent		
Representations	3	
Representation 1		Officer Response
Part 1.1.1 - Objecting		
The aspiration to develop Lewisham on this scale is not one		Objection noted. The Proposed
I have ever seen pres	sented at election time. I very much	Submission Version of the AAP

doubt if it has the support of the local population. You will not find out whether it does or not through this consultation, which is so difficult to participate in. I have never seen a more complex consultation system. The idea of bringing so many extra people into Lewisham, both to live and to shop, will place a huge strain on the local infrastructure. There do not appear to be adequate plans to develop the amenities required to accommodate so many people. Where will the extra trains, buses, etc fit ? Where are the additional school places, primary healthcare facilities etc. It will make Lewisham a horrible place to live.	includes references to the Lewisham Town Centre Transport Study (inc addendums) and also Appendix 4 contains the Lewisham town centre infrastructure schedule which details the key infrastructure needs of the town centre.
Representation 2	Officer Response
Section 4.6 – Commenting	Comments noted No shanga
The needs of the Ladywell Character Area require broader consideration. The AAP currently focuses on the Leisure Centre site. More attention is needed on how to develop the two currently vacant sites, namely the site of the former Watergate School (for which there seems to be no plan) and the site of the former Adhesive Specialities Factory at 59 Ladywell Road (where development appears to have stopped). There is also the question of how the site currently occupied by Carpet Corner will be developed. There is a danger that these sites will all become residential developments, missing the opportunity for social amenity, unless there is a co-ordinated plan. There is also a danger that if they are developed insensitively, the historical heart of the borough will be irrevocably changed. High quality developments must be required and low quality applications, such as recently for the Carpet Corner site, must be rejected. The site of the former Watergate School has an established educational use, which it would be appropriate to continue. The site of the former Adhesive Specialities Factory has been a source of local employment, which should be retained, or combined with residential use. If the Leisure Centre site is to fall away from use as a public amenity, this loss should be addressed, for example by the Playtower becoming a venue for community use. The Council should be more active in this.	Comments noted. No change. The former Watergate School site is dealt with as part of the Lewisham Site Allocations Development Plan Document.
Representation 3	Officer Response
Part 3.13 – Objecting	

The Gateway Project was approved some years ago now	No Change.
and appears to be on hold (I assume for financial reasons).	The Lewisham Gateway site is a
At the point it becomes possible to begin building, the whole	Strategic Site for the borough and
design must be reviewed. Otherwise there is the danger	therefore policy for it is contained within
that the centre of Lewisham becomes dominated by a	the Core Strategy. The AAP does not
design that is out of date before it is even finished. The	make further site specific policy for this
current design was approved before surrounding	site.
developments, which have now been approved and, in the	
case of Loampit vale, are being built. The impact of these	
on the Gateways project itself, must be assessed. In the	
case of Loampit Vale, a higher quality, lower density	
development was approved: an outcome which would be	
likely for the Gateway if it was to be considered a fresh	
now. The specification for the Gateway is also now out of	
date. Much greater attention now needs to be given to	
environmental features. The buildings should be carbon	
neutral and much more public green space provided.	
Please don't allow us to have tower blocks that make	
Lewisham appear to be ten years behind everywhere else!	

Consultee	Ms Carre Wylder
Agent	
Representations	2

Representation 1	Officer Response
Representation 1 General - Objecting In regards to keeping the bus highway going through the central walking piazza area I do raise a strong concern that no consultation at all is being held with businesses for such a major changes to their trading district. Four years ago you asked businesses about it and since then traders have endured three years of recession and economic turmoil.	Officer Response No change. Considerable consultation has been undertaken through the history of the production of the AAP and through the Further Options process. Officers consider that sufficient interaction with
This will certainly have changed business owners views on footfall outside their retail outlet. I cannot believe that any business owners would want to retain a road that only the nimble, quick and lucky can get across to get to their shop. If they were asked again and given the alternative of easy direct footfall access into their shop without customers having to run the gauntlet every time I think they would say	town centre businesses has taken place.

<ul> <li>yes to it.</li> <li>There must be a way of directing buses around the central area that would allow the piazza to be a piazza and bus users to access the buses easily.</li> <li>I call for businesses to be asked again. You cannot enter into such a massive project like this without consulting the businesses that will be affected. It is unprincipled in my opinion and those businesses must be consulted directly.</li> </ul>	
Representation 2	Officer Response
Site Specific Policy 5.1: Ladywell Leisure Centre site – Commenting I am writing to appeal for a cinema complex site to be considered at the current Ladywell Leisure Center when it is finally pulled down. Lewisham is suffering from not having any cinema whatsoever with all that potential income going to other boroughs - other boroughs that sustain dozens of cinemas. The Ladywell Leisure Centre site is ideally situated between Catford and Lewisham, it is big enough to build a good size complex on and although it has good bus links already, it is walkable for people from Lewisham, Ladywell, Hither Green and Catford. Our young people need it, the borough needs the income to stay in the borough and the site would regenerate that end of the central trading area of Lewisham.	Comments noted. Officers, landowners, developers and other stakeholders are working together on a number of sites in the heart of the town centre, seeking to provide a cinema in Lewisham. Further details will be provided when they become available.

Consultee	Nikki Spencer	
Agent		
Representations	1	
Representation 1		Officer Response
Site Specific Policy 5 Commenting	.1: Ladywell Leisure Centre site -	
Think it is an exceller cinema.	nt idea to turn the baths site into a	Comments noted. Officers, landowners, developers and other stakeholders are working together on a number of sites in the heart of the town centre, seeking to provide a cinema in Lewisham. Further details will be

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Consultee	Patrick Blake for The Highways Agency	
Agent		
Representations	1	
Representation 1		Officer Response
General comments		

Consultee	Rachel Holdsworth
Agent	
Representations	1
	-

Representation 1	Officer Response
Site Specific Policy 5.1 (Ladywell Leisure Centre site) – Commenting	
I would like to comment on the proposals for the redevelopment of Ladywell Pool and request that consideration be given to turning this site over into a cinema / arts centre.	Comments noted. Officers, landowners, developers and other stakeholders are working together on a number of sites in the heart of the town
The campaign to restore Hither Green's old Park Cinema has received a lot of support and demonstrated a desire for a community space of the kind that Lewisham is severely lacking. The site would have an impressive catchment area (Lewisham, Catford, Hither Green and Ladywell are all within walking distance, and is well served by buses) and would provide much more of "a key opportunity to help support the vitality and viability of the southern part of the town centre" than option 2 described in the action plan.	centre, seeking to provide a cinema in Lewisham. Further details will be provided when they become available.
Lewisham is a nice place to live, but lacks much to do in the evenings. An arts centre would stop the inevitable drift out to Greenwich, Blackheath and Brockley and inject some excitement and imagination back into the area. We don't need more food shops (what, another Tesco Express?) or flats - what we need is something for people to *do*.	

Consultee	Roger Sedgeley for Lewisham Green Party	
Agent		
Representations	9	
Representation 1		Officer Response
Objective 1 - Retail and The proposals for the Centre cover many as previously issued. On Green Party, support one area we fundame Lewisham to the statu- totally misguided and Objective 1 - Retail and already stated we cor- increase the size of the seek Metropolitan Ce- the bigger picture in the East London. Lewisha competing with each and New Cross. All has centre and theatre in the night time econom- series of major chain ever be viewed as se Wharf, Bluewater and accessible by public the quality shopping. Gree have cornered the main needed is a new vision surveyors' view that the get more of the "High and to base these are simplistic and not right report needs to addres strengths of Lewishar transport links. In fact unconvincingly when	nd Town Centre Status – Objecting development of Lewisham Town spects and build on documents most issues we, in the Lewisham the proposals in principle, however in entally disagree. The notion to move us of Metropolitan Centre by 2026 is should be reconsidered. Ind Town Centre Status: As we have mpletely disagree with the proposal to ne town centre by 40,000m2 and to intre Status. This view seems to ignore he Borough of Lewisham and South am borough already has four centres other in Lewisham, Catford, Deptford ave different strong points; the civic Catford, the markets in Deptford, and my in New Cross. Lewisham has a shops but in all cases they can only condary level units. Bromley, Canary d the West End are all easily ransport and already have better enwich and Blackheath town centres arket in "boutique" shopping. What is on that does not rely on the commercial he road to successful shopping is to St" brands into the shopping centre ound a department store. This view is at for Lewisham. The next stage of the ess new ideas that build on the m, the market and its first class it the report touches on it it states "The retail character of the the town centre contains a mix of	No change. Officers consider that Objective 1 and the vision to achieve Metropolitan Status are integral to the success of the AAP and are supported by Regional and National policy.

home. New high rise housing in the town centre will lead to the development of an appropriate night time economy and a more diverse retail mix quicker than merely creating extra retail space. New housing schemes on the edge of the town centre must be more imaginatively designed. it is too simplistic too use the ground floors for shop units. Most of the new developments where the planners have insisted on shops at ground floor have empty units. Defensible space or raising the ground floors are viable alternatives. <b>Representation 2</b> Objective 2 Housing - Commenting We agree that the centre of Lewisham is an appropriate place to build high rise buildings and we support high density housing on this site in principle but this is subject to being convinced by full daylight and shadowing reports and the buildings being of high quality and sustainable design. The tall buildings should only be built in the core of the town	Officer Response         Comments noted.         No change.
centre. The inappropriateness of the tall building at the bottom of Loampit Hill is an unfortunate example of poor urban planning. The new homes to be built by 2016 must be built to at least Level 5 of the Code for Sustainable Homes, and there should be a least 50% social housing. The principle of building over or converting floors over shops should be encouraged. The developers should also be encouraged when providing new housing schemes in the town centre to cross finance these with low rise family schemes elsewhere in the borough. We believe this could be a method to create new council owned housing.	

Objective 3 Sustainable Design - Commenting We obviously support this but would expect it to be more than "Greenwash." Buildings must be built to higher standards such as BREEAM excellent and Level 5 of the Code for Sustainable Homes. In addition a major program of bringing the existing building stock up to equivalent levels should be initiated. This would not only have the benefit of reducing Carbon Emissions but would also create local employment and new companies.	Comments noted. Standards are set in the borough-wide Core Strategy, however policy LAAP25 of the Proposed Submission Version of the AAP contains details of environmental practices required for adapting to climate change.
Representation 4	Officer Response
Objective 4 Employment and Training - Supporting We fully support the need to create employment and training. This should be locally based whereever possible and we would encourage the view that it there is real scope in the Green industries such as renewable energy production and the energy saving trades such as home insulating.	Support noted.
Representation 5	Officer Response
Objective 5 Open Space / Recreation – Commenting We fully support the need to create new public and open space around the Town Centre. In simple terms we need more trees and less tarmac. We need to create a new park area in the town centre to provide open space for the new homes that will be built. We may need to think more imaginatively on how we do this. The Green Bridge in Mile End successfully linked two green areas and created a safe route. Maybe this is the solution that needs to be adopted to link the town and transport interchange.	Comments noted. No change. The link between the transport interchange and the town centre will be dealt with in the development management of the Lewisham Gateway site (policy through the Core Strategy).
Representation 6	Officer Response
Objective 6 Transport - Supporting We fully support the desire to reduce car use, introduce more public transport and increase cycle use and walking.	Support noted.
Representation 7	Officer Response
Objective 7 Environment - Commenting The protection and enhancement of the rivers Quaggy and Ravensbourne is important. We believe there is merit in	Comments noted. No changes.

ficer Response
omments noted. o change. e Proposed Submission Version of e AAP contains policies to encourage e evening and leisure economies AAP3-8, LAAP17 and LAAP22).
ficer Response
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Consultee	Rose Freeman for The Theatres Trust	
Agent		
Representations	2	
Representation 1		Officer Response
LTC COM3: Range of Community, Leisure and		
Entertainment Spaces – Commenting		
We support this amended preferred option and are pleased to see a new cinema is proposed for the Lewisham		Comments noted.

Gateway site but remain disappointed that arts and cultural facilities have not been included as a contribution to the vitality of the centre in your London Borough. Culture and arts cover a wide area of activities, events, projects etc, but fall mainly into the following categories - museums, galleries, libraries, theatre and performance arts, literature, music, dance, festivals, crafts and exhibitions, cinema and films.	No change.
Representation 2	Officer Response
Glossary - Comment	
We note the description of 'Creative Industrie' on page 86 in the Glossary but as this term does not appear anywhere in the document we see no point for its inclusion.	Noted and amended.

Consultee	Ruth Bradshaw
Agent	
Representations	1

Representation 1	Officer Response
Site Specific Policy 5.1 Lewisham Leisure Centre Site – Commenting I understand that consultation is currently underway on an	Commente notad Officers
Area Action Plan for Lewisham town centre and that this includes proposals for the Ladywell Leisure Centre site which will become available once the leisure centre on Loampit Vale opens in 2013.	Comments noted. Officers, landowners, developers and other stakeholders are working together on a number of sites in the heart of the town centre, seeking to provide a cinema in
I believe that this site would make an excellent location for a cinema, something which is sadly lacking in the borough at present. I currently travel to Greenwich regularly to go to the cinema but I would much prefer to be able to visit a cinema locally. This location is also good in terms of being easily accessibly by bus from most parts of the borough and would provide access to the cinema for people who currently are unable to travel to ones in other boroughs. I know there are now a number of very successful film clubs in the borough but these can not provide for everyone and in my experience are often oversubscribed. A proper cinema could provide a wider range of films at a choice of	Lewisham. Further details will be provided when they become available.

Consultee	Sallie Rickerby
Agent	
Representations	1

Representation 1	Officer Response
General - Objecting	
Having spoken to you in the Lewisham shopping mall regarding my strong objections to the local development framework, I wish to register that I am of the same opinion since reading the given literature. We need homes not housing in Lewisham. The outlined plans for high rise in areas such as the Lewisham roundabout and Thurston Road are completely unacceptable as they are unsustainable due to lack of green space, utilities and infrastructure etc. Busy roads and pavements will be even more crowded and for what? The answer is to house more people who will use the area solely as a sleepover whilst spending their time in the City or Canary Wharf. St Johns conservation area is becoming a fish bowl overlooked by cheap modern high rise blocks. Ordinary people are no longer catered for in Lewisham's long term objectives.	Objection noted. No change, although a tall buildings policy (LAAP19) has been included in the Proposed Submission Version of the AAP.

Consultee

Land Securities

Agent	Angela Parikh for DP9	
Representations	15	
Representation 1		Officer Response
Figure 4: Summary of	AAP Proposals – Supporting	
The revised image is considered to set out the proposed improved links in a north-south and east-west direction through the centre.		Support noted. No change.
Representation 2		Officer Response
LTC SH2 (Viability) – Supporting This policy is welcomed, in particular the encouragement of public realm enhancements, a greater mix of uses including cafes, bars and other evening economy uses, street lighting with a view to making the town centre a safer place, a greater component of residential development, mixed use allocations on key development sites and the creation of a secondary focus of activity at the southern end. Notwithstanding this, it is considered that policies encouraging residential uses in town centre must be flexible to ensure that the type, mix and tenure of housing to be delivered is suitable for the site on which it is to be delivered. For example, family housing generally requires more amenity space and it may not be possible to deliver the required quantum of amenity space in some locations within the town centre.		Support noted. No change.
Representation 3		Officer Response
LTC SH5 (Primary Shopping Areas) – Supporting and commenting The Primary Shopping Areas are not defined in Figure 4, this information is contained in Figure 5 taken from the Core Strategy. The Primary Shopping Area is protected from harm to its retail character, in particular the provision of 70% of ground floor units being within A1 use. The provision of built in flexibility to this policy with regards to vacant units and uses that generate pedestrian movements is welcomed. The policy includes the need to respect existing street patterns in the creation of new urban grain; it is considered that the restrictive impact of some existing building structure and layout should also be taken into		Comments noted. No change.

account.	
Representation 4	Officer Response
LTC SH6 (Secondary Shopping Areas) – Supporting	
This policy is welcomed	Support noted.
	No change.
Representation 5	Officer Response
LTC SH8 (Criteria for Evening Economy Uses) –	
Supporting	
This policy considers that the Lewisham Gateway is a suitable town centre location for evening economy uses and	Support noted.
is welcomed.	No change.
Representation 6	Officer Response
LTC URB4 (Mixed Use) – Supporting	
This policy encourages a horizontal and vertical mix of uses	Support noted.
in Lewisham town centre, in particular high density	No change.
residential development above ground floor retail and commercial uses and is welcomed where practical and	
appropriate.	
Representation 7	Officer Response
	Officer Response
Representation 7LTC URB5 (Urban Enclosure, Grain) – SupportingThis policy encourages the use of built edges of public	Officer Response Support noted.
Representation 7LTC URB5 (Urban Enclosure, Grain) – SupportingThis policy encourages the use of built edges of publicspaces to act as unified urban 'backdrops' and avoid the	
Representation 7LTC URB5 (Urban Enclosure, Grain) – SupportingThis policy encourages the use of built edges of public	Support noted.
Representation 7 LTC URB5 (Urban Enclosure, Grain) – Supporting This policy encourages the use of built edges of public spaces to act as unified urban 'backdrops' and avoid the 'backs' of properties from fronting onto major street and public spaces where possible. This approach is welcomed.	Support noted. No change.
Representation 7LTC URB5 (Urban Enclosure, Grain) – SupportingThis policy encourages the use of built edges of publicspaces to act as unified urban 'backdrops' and avoid the'backs' of properties from fronting onto major street andpublic spaces where possible. This approach is welcomed.Representation 8	Support noted.
Representation 7 LTC URB5 (Urban Enclosure, Grain) – Supporting This policy encourages the use of built edges of public spaces to act as unified urban 'backdrops' and avoid the 'backs' of properties from fronting onto major street and public spaces where possible. This approach is welcomed.	Support noted. No change.
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Representation 7LTC URB5 (Urban Enclosure, Grain) – SupportingThis policy encourages the use of built edges of publicspaces to act as unified urban 'backdrops' and avoid the'backs' of properties from fronting onto major street andpublic spaces where possible. This approach is welcomed.Representation 8LTC EMP1 (Employment uses in Lewisham Town Centre) –ObjectingWe object to this policy as it is unnecessarily onerous torequire employment sites to have been vacant and	Support noted. No change. Officer Response Officers consider the existing policy to be appropriate and required to protect
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We object to this policy as resisting the loss of office floorspace where its loss would facilitate regeneration would be contrary to the strategic aim to sustain and enhance the vitality and viability of the town centre.	The Core Strategy for Lewisham appoints Lewisham as the primary office location in the borough. To support this, officers consider the protection of office use in the town centre is appropriate. No change.
Representation 10	Officer Response
LTC TRS4 (Mitigating against the impact of roads and roundabouts) – Supporting This policy seeks to mitigate against the impact of roads and roundabouts and is welcomed in response to the need for pedestrian and cyclists experience of the town centre to be given equal priority to that of road users.	Support noted. No change.
Representation 11	Officer Response
Character Area Policy 6 (Central area character) – Supporting The sub area policy breaks down the central area into several vicinities: Land north east of the shopping centre, Land south of the shopping centre and the Citibank Tower, this approach is welcomed. Principle 2 (southern anchor): This policy is welcomed as the southern part of the centre is a key consideration in the future of the centre and provides a framework within which a lack of large units at the southern end of the high street can be addressed. Principle 3 (pedestrian and vehicular environment): This policy is welcomed as it provides the flexibility potentially required to replace the current roundabout arrangement in order to improve north south linkages into the centre. Principle 4 (accessibility from northern and southern entrances): This policy is welcomed in order to improve linkages into and through the centre and provide opportunities for landmark buildings at both gateways into the centre. Additional principle (c): This policy is welcomed as it is more supportive towards development within the AAP area in order to achieve the objectives of the document.	Support noted. No change.
Representation 12	Officer Response

Site Specific Policy 6.1 (Land north east of the shopping centre) – Supporting The encouragement of A1-A3 retail uses and/or D2 leisure uses on the ground floor with commercial and/or residential (C3) on upper floors is welcomed. Principle 5 (Flood Zone): This policy is welcomed as it is more supportive towards development within the AAP area in order to achieve the objectives of the document.	Support noted. No change.
Representation 13	Officer Response
Site specific Policy 6.2 (Land south of the shopping centre) – Supporting and commenting The encouragement of retail or leisure uses on the ground floor with commercial and/or residential uses on the upper floors is welcomed. We consider that this policy should also encourage the provision of large individual units which can act as an anchor for the southern part of the town centre.	Support and comments noted. No change.
Representation 14	Officer Response
Site Specific Policy 6.3 (Citibank Tower) – Supporting This policy is welcomed.	Support noted. No change.
Representation 15	Officer Response
General comments – Supporting and commenting Having reviewed the document it is considered that the principles of improving the retail, leisure and mixed use offer of Lewisham town centre are all welcomed. In addition the encouragement of uses that contribute to the evening economy, an improved public realm and greater proportion of residential and commercial accommodation are all welcomed. It is considered that the document should also acknowledge that within the lifetime of the document a new retail capacity study may be commissioned and that the TC AAP policy should be able to respond to any recommendations set out within this document.	Support and comments noted. No change.

Consultee	Environment Agency
Agent	
Representations	8

Representation 1	Officer Response
Representation 1 General comments We are pleased to note that our comments in response to the Preferred Options consultation have been incorporated in this document, in particular, with regard to flood risk and the enhancement of Lewisham's waterways. Overall the report indicates a wish to improve the watercourses within Lewisham and reduce the risk of flooding when planning new developments. A lot of detail has been included within the report with regards to the Rivers Quaggy and Ravensbourne which run through the town centre. The document acknowledges the areas that are going to be within the flood risk zones and that the Environment Agency should be involved in the early stages of development in order to agree mitigation measures. Throughout the report there is recognition that during development and regeneration the access to the rivers and use of the river as a public amenity for the community should be considered and improved. We are pleased to note that LB Lewisham's Strategic Flood Risk Assessment (SFRA) is referred to throughout the document. However, we would point out that it is a high level assessment covering the whole borough. We would reiterate our previous recommendation that a more detailed assessment of risk from all sources of flooding is carried out specifically to inform the major development sites within the Lewisham Town Centre Area.	Support and comments noted. No change. Officers consider that the Lewisham SFRA, borough Surface Water Management Plan, and further work with the EA including the River Ravensbourne Corridor Improvement Plan is sufficient evidence on which to base the AAP policy. Further local flood assessment will be required as part of applications for major development.
Representation 2	Officer Response
<ul> <li>2.1 Geographical Context – Commenting</li> <li>Please acknowledge the role of the Environment Agency in preparing the River Ravensbourne Corridor Improvement</li> <li>Plan in the penultimate paragraph of this section.</li> <li>Representation 3</li> </ul>	Comment noted and amendment made in Proposed Submission Version. Officer Response
2.2.2 Environment Flood Risk – Commenting	
This should mention the new responsibilities of the LPAs under the Flood and Water Management Act 2011.The Act gives LPAs responsibility for preparing and putting in place strategies for managing flood risk from groundwater,	The wider strategy for managing flood risk from groundwater, surface water and ordinary watercourses for the borough (The Surface Water

surface water and ordinary watercourses in their areas	Management Plan) is being dealt with comprehensively and separately from the AAP.
Representation 4	Officer Response
<ul> <li>2.4 Objectives – Commenting</li> <li>Objective 7 – Environment: We suggest this could be reworded to include river restoration, that is, 'To protect, enhance and restore the Rivers Quaggy and</li> <li>Ravensbourne' This also applies to preferred option LTC</li> <li>URB7, of which we are very supportive. There is no mention of surface water flooding, however. The council should lead and coordinate the production of a Surface</li> <li>Water Management Plan (SWMP) that considers flood risk from surface water, groundwater and ordinary</li> <li>watercourses. The plan should include an assessment of flood risk from these sources and a programme of actions to manage these risks. A SWMP will help put in place: •</li> <li>support for greater use of Sustainable Drainage Systems (SuDS) to help avoid large investments in unsustainable hard infrastructure; • identify design approaches that avoid and reduce flood risk to and from new development (PPS 25); • information to improve emergency planning decisions for local authorities and awareness of surface water flooding when preparing for emergencies.</li> </ul>	Comments noted and changes have been made to Objective 7.
Representation 5	Officer Response
Area-wide spatial policies and sub-area specific policies – Supporting and commenting We are pleased to note that, although the policies in the previous version of the document relating to flood risk have been removed, flood risk is highlighted as an issue to be considered in the amended site specific policies. It is important that the benefits from buffer zones are highlighted with respect to site specific policies. Buffer strips help reduce the risk of/impact from flooding, provide environmental/ecological improvements to urban areas and also provide valuable amenity space.	Support and comments noted. No change.
Representation 6	Officer Response
Policy LTC URB7 – Supporting and commenting We support the new policy LTC URB7 which promotes the	Support and comments noted.

enhancement of Lewisham's rivers, and we welcome the proposed character area policies for sites in Flood Zone 3a which identify the need to work closely with the Environment Agency on flood risk issues. We recommend that the policy be strengthened by adding that rivers should form the backdrop of development to emphasis the elements of deculverting and river naturalisation.	The approach to rivers has been amended in the Proposed Submission Version of the AAP. The town centre wide 'rivers policy' has been removed and replaced with site specific detail in the Town Centre Area policies where there is a relationship with the rivers.
Representation 7	Officer Response
Character Area Policy 3: Conington Road – Supporting The potential for river restoration within the borough is enormous. We welcome preferred option Character Area Policy 3 which seeks to promote the naturalisation and improvements to the ecological quality of the river by the Tesco site.	Support noted. No change.
Representation 8	Officer Response
Character Area Policy 4 - Lee High Road – Supporting Our enforcement team have found evidence of plumbing misconnections at properties on Lee High Road which have resulted in foul water being discharged directly into the River Quaggy. We therefore welcome the key principles identified in this preferred policy to protect and enhance the river in this area.	Support noted. No change.

Consultee	Greater London Authority Planning Decisions Team
Agent	
Representations	5

Representation 1	Officer Response
Various – Objecting	
The previously supported policy on car parking standards has been removed from this version of the AAP, in order to accord with government guidance and to avoid repetition with the London Plan and the borough's emerging Core Strategy. While this is noted, the use of shared parking spaces in town centres is still encouraged, alongside the promotion of a restraint based approach to parking for new	The Proposed Submission Version of the AAP has been updated to reflect the standards for electric vehicle charging points in the London Plan 2011.
developments across all land uses, given the highly accessible nature of the AAP area. Since the previous	

<ul> <li>version of this document was produced there is now a requirement for car parking spaces at new developments to be fitted with electric vehicle charging points. The AAP should therefore include a reference to the emerging standards contained within the draft replacement London Plan.</li> <li>Representation 2</li> <li>Various - Supporting</li> <li>Issues previously raised in relation to the requirement for new developments to be supported by Transport</li> <li>Assessments and Travel Plans, are covered by emerging</li> </ul>	Officer Response Support noted. No change.
policies in the boroughs Core Strategy and the London Plan, which is supported.	
Representation 3	Officer Response
Policy LTC URB7 – Objecting The policy should make specific reference to the aims of the Blue Ribbon Network policies in restoring habitats and biodiversity, and ensuring better access to recreational spaces.	In the Proposed Submission Version of the AAP policy LTC URB 7 has been removed. Officers consider that the general approach to rivers and waterways in the borough is dealt with comprehensively by Core Strategy Policy 11 (including specific reference to the Blue Ribbon Network). Localised detail is provided in the Town Centre Area Policies of the AAP (LAAP3 – LAAP8) where appropriate.
Representation 4	Officer Response
Character Area Policies 3,4,5 and 6 (Conington Road, Lee High Road, Ladywell Road, Central Character Areas) – Objecting Priorities for site-specific developer contributions should also include reference to 'public transport improvements' as in accordance with the London Plan; alongside affordable housing and support for employment uses, transport improvements should generally be given the highest priority.	The Town Centre Areas of Conington Road, Lee High Road, Ladywell and Central have been adjusted in the Proposed Submission Version (Policies LAAP5 – LAAP8) of the AAP to include the reference to 'public transport improvements'.
Representation 5	Officer Response

4.6 Ladywell Road Character Area – Commenting	
Option 1 is likely to have the most significant traffic impact	Option 2 was progressed to become
and is therefore discouraged. However, should this option	the draft policy in the Proposed
be progressed, all potential impacts on the highway and	Submission Version of the AAP.
public transport network would require sufficient mitigation.	

Consultee	Valerie Fairbrass	
Agent		
Representations	1	
Representation 1		Officer Response
Site Specific Policy 5 Objecting	.1: Ladywell Leisure Centre Site –	
Ladywell Leisure Cer it can be used as a ci	ntre site should be redeveloped so that nema.	Comments noted. Officers, landowners, developers and other stakeholders are working together on a number of sites in the heart of the town centre, seeking to provide a cinema in Lewisham. Further details will be provided when they become available.