

Responses to the Lewisham Town Centre AAP Proposed Submission version consultation

There were 18 respondents to the consultation, leaving 61 individual comments. Officers have examined the representations received and would recommend that 15 main modifications are made to the AAP to accommodate the representations made. The remaining 46 comments received were either support, comments or issues where the Council does not feel a change to the AAP is warranted. Proposed text deletions are marked using ~~strike through~~ and additions are marked in **bold and underlined**. Three respondents stated that they wished to participate at the oral examination (Drivers Jonas for Chesterhouse Properties (LREP3); Mr Geoffrey Thurley (LREP6); and Indigo Planning for Trademark Homes (LREP10)).

Officers' recommended full text changes are set out in two schedules, one of main modifications (LTCLP1.7) and one of additional modifications (LTCLP1.7a).

Respondent's Name/ID	Representation ID	Paragraph, Policy, Section, Figure	Comment (sound/unsound)	Summary of representation	Officers' response	Modification?	Modification number in Schedule of modifications
CGMS for Met Police (LREP1)	LREP1.1	Policy LAAP16	Not stated	Supported	Noted	No change	N/A
	LREP1.2	Policy LAAP22		Should include reference to policing	Recommended for inclusion. Adjust part 1 of policy LAAP22 to read: "1. The residential and commercial growth of Lewisham town centre will demand provision of additional social infrastructure such as, schools, childcare and health facilities, and community and leisure spaces and policing. "	Main modification	MM24
Coal Authority (LREP2)	LREP2.1		Not stated	No comments	Noted, no changes are recommended	No change	N/A
Drivers Jonas for Chesterhouse Properties (Thurston Industrial Estate) (LREP3)	LREP3.1	Vision and objectives	Not stated	Support	Noted, no changes are recommended	No change	N/A
	LREP3.2	Policy LAAP4		Should not restrict the conversion of comparison retail to convenience retail. The retail capacity study suggests need for convenience by 2014 and Chesterhouse are not	No changes are recommended. Policy LAAP4 is required to retain and increase the volume of comparison retail space in the town centre in order to meet the AAP vision by	No change	N/A

Note: This respondent requested to attend the oral part of the examination.	LREP3.3	Policies LAAP9, LAAP10, LAAP11		sure how this will be delivered (other than the Tesco extension), so Thurston Industrial Estate could be a sequentially acceptable location, and this flexibility should be retained. This could also be represented on a town centre wide scale through LAAP14.	reaching metropolitan status. In order to meet this target, it is important that the Loampit Vale TCA provides comparison retail. Pages 68 and 69 of the Retail Capacity Study 2009 detail the approach to meeting the boroughs convenience shopping needs. The study identifies 6 sites for growth of the convenience offering. Lidl in Lee High Road is built and open, an application has been received to extend the Lewisham town centre Tesco, The Catford town centre Tesco is planned for redevelopment as part of the wider town centre regeneration and the Leegate development site has held public consultation regarding a new supermarket on site and is proposing to submit an application in 2012. The other two sites are Sainsburys sites in New Cross and Lewisham town centre, where the Council hope there will be progress in the near future.	Noted, no changes are recommended	No change	N/A
English Heritage (LREP4)	LREP4.1	Pages 86 and 87	Not stated	Support	Noted, no changes are recommended	Noted, no changes are recommended	No change	N/A
Environment Agency (LREP5)	LREP5.1	Policy LAAP25 and Appendix 4	Sound	Support	Noted, no changes are recommended	Noted, no changes are recommended	No change	N/A
Geoffrey Thurley					Officers do not agree that the Lewisham Town Centre AAP is			

(LREP6) Note: This respondent requested to attend the oral part of the examination.	LREP6.1	Policy LAAP7	Unsound Not justified	The IDP identifies a shortfall of swimming space and therefore the Ladywell Leisure Centre should be retained as a swimming pool.	unsound. Comments are noted, but no changes are recommended. The Infrastructure Delivery Plan 2010 states that if the current ratio of swimming space provision against population is to be retained then a further 600m ² is required by 2026. However, the Leisure and Open Space study 2010 tells us that according to Sport England's Sports Facility Calculator there is sufficient swimming space until at least 2025. There is therefore a slight over-provision at the current time which will withstand the growth of the population over the plan period.	No change	N/A
	LREP6.2	Policy LAAP7	Unsound Not justified	Large retail on the Ladywell Leisure Centre site would be detrimental to the existing retail on the other side of the road.	Comments are noted, but no changes are recommended. The Council have received advice from independent retail consultants regarding the appropriate level of retail for the Ladywell leisure centre site. The level in the submission AAP (up to 1,400sqm) is considered appropriate for the location without having a detrimental affect on existing nearby retail.	No change	N/A
GLA (LREP7)	LREP7.1	General	Sound (and in general conformity with the London Plan)	General support	Noted, no changes are recommended	No change	N/A
GL Hearn for Land Securities (LREP8)	LREP8.1	Policy LAAP16	Not stated	Use of the sequential test should be promoted to ensure primary shopping remains in the primary shopping area.	No changes are recommended. The sequential test is part of the NPPF and is therefore a relevant consideration for all applications. The	No change	N/A

	LREP8.2	Vision, Objective 1 and Section 4		Why is 40,000sqm from Core Strategy exceeded by the aggregate of allocations?	<p>AAP does not need to repeat this approach.</p> <p>No changes are recommended. Each Town Centre Area has been allocated an indicative capacity in the AAP. This is not a development proposal and does not suggest that each area will necessarily be filled to this capacity. While the total of the indicative capacities exceeds 40,000sqm retail, the vision of the AAP remains to achieve 40,000sqm to reach metropolitan status.</p> <p>Further, the 40,000sqm identified in the Core Strategy is supported by the sites identified in the Retail Capacity Study 2009. If over the course of the plan period further sites become available, the plan will be required to adapt.</p>	No change	N/A
	LREP8.3	Para 3.15		Add text to explain that figures 3.4 – 3.6 are indicative and aspirational	No changes are recommended. The existing text explains that Section 3.3 sets out the context for Policy LAAP2.	No change	N/A
	LREP8.4	Para 4.4		Add “seek to” in the sentence where the aims of the Lewisham Gateway TCA are listed.	Recommended for inclusion. Adjust paragraph 4.4 to read: “The Lewisham Gateway TCA will seek to deliver the following:”	Main modification	MM10
	LREP8.5	Section 4.2 Para 4.8		Note that development in the Loampit Vale Town Centre Area should not endanger the viability, vitality and focus of the shopping centre and the Central Area more generally.	Recommended for inclusion. Adjust paragraph 4.8 to read: “and essential community facilities. <u>New retail provision should complement and not compete with the existing Primary Shopping Frontage.</u> Key route and public realm improvements”.	Main modification	MM11

	LREP8.6	Section 4.2 Para 4.8		It should be emphasised that this is an edge of centre location that is disconnected from the town centre by road and rail infrastructure and by natural features.	No changes are recommended. Paragraph 4.8 of the AAP already states that Loampit Vale Town Centre Area is considered 'edge of centre'. The Council do not consider it disconnected from the town centre and with the town centre uses along Loampit Vale South and the Lewisham Gateway site both planned and under construction the area will become 'town centre' itself.	No change	N/A
	LREP8.7	Section 4.2 Key area objectives		Add that any retail development in the area should be complementary to the Primary Shopping Area, including bulky goods and not convenience or fashion retail.	This is dealt with by change no. MM11 of the schedule of changes, which reflects the change proposed to paragraph 4.8 detailed above.	Main modification	MM11
	LREP8.8	Policy LAAP4		This is out of centre (as over 300m from primary shopping area) and relies on other development to connect it and therefore shouldn't have 11,000sqm of additional retail. As it is out of centre LAAP4 is contrary to Retail Capacity Study and the NPPF unless it states that retail in this area must go through sequential test and include an assessment to demonstrate that there will be no detrimental impact on town centre vitality and viability.	No changes are recommended. The Council consider that given the pedestrian and transport links to the primary shopping area and the proposed development at Lewisham Gateway which will link the two areas, that this area is currently considered as 'edge of centre' and on development of the Lewisham Gateway scheme will become 'town centre'.	No change	N/A
	LREP8.9	Policy S3a and S3b		These sites are in an out of centre location and therefore are not appropriate for comparison shopping.	No changes are recommended. The Council consider that given the pedestrian and transport links to the primary shopping area and the proposed development at Lewisham Gateway which will link the two areas, that these sites are currently considered as 'edge of centre' and on development of the Lewisham	No change	N/A

	LREP8.10	Policy S5		Define what 'commercial' means in the policy.	Gateway scheme will become 'town centre'. These sites are therefore considered as appropriate for comparison retail. Recommended for inclusion. Adjust point 11 in Policy S5 as follows: "This site is considered most appropriate for a commercially led mix of uses <u>(employment generating, most likely B1 use)</u> , although sensitive design could make some residential use acceptable."	Main modification	MM14
	LREP8.11	Section 4.3		The NPPF defines this area as out of centre (over 300m from the Primary Shopping Area).	Recommended for inclusion. Adjust 4.14 to read: ".....This edge of centre <u>out of centre</u> Town Centre Area.....". The Council point out that the development of Lewisham Gateway and the associated improved connections would move this Town Centre Area to 'edge of centre'.	Main modification	MM15
	LREP8.12	Section 4.3 Key area objectives		Adjust the third key area objective as follows: "Provide retail services for the Borough's residents <u>in the form of an extension to the existing foodstore</u> , suitable for an edge of centre location that supplements those contained in the Central Area".	Recommended for inclusion. Adjust the third key area objective as follows: "Provide retail services for the Borough's residents <u>in the form of an extension to the existing foodstore</u> , suitable for an edge of centre location that supplements those contained in the Central Area".	Main modification	MM17
	LREP8.13	Policy LAAP5 paragraph 2		Adjust Policy LAAP5 paragraph 2 to read: "Development involving underground parking, retail expansion <u>foodstore extension</u> (up to 3,000m additional floorspace". This supports the approach set out in the Retail Capacity Study 2009.	Recommended for inclusion. Adjust Policy LAAP5 paragraph 2 to read: "Development involving underground parking, retail expansion <u>of the existing store</u> (up to 3,000m additional floorspace". This supports the approach set out in the Retail Capacity Study 2009.	Main modification	MM18

	LREP8.14	Policy LAAP5 paragraph 2		Add the following text as a new part a) of Policy LAAP5 paragraph 2: "Any application for additional retail development comprising main town centre uses as defined in the NPPF will be required to comply with the sequential approach to site selection and include an assessment to demonstrate that there will be no adverse impacts arising on the town centre vitality and viability".	No changes are recommended. The sequential test is part of the NPPF and is therefore a relevant consideration for all applications. The AAP does not need to repeat this approach.	No change	N/A
	LREP8.15	Policy LAAP8 paragraph 1a		Delete existing paragraph 1a and replace with the following text: "As the Lewisham centre is managed, refurbished and redeveloped over time, east-west connections across the shopping centre should be improved where appropriate in the context of the centre's management plan and the protection of the retail circuit and pedestrian footfall".	No changes are recommended. The improvement of pedestrian connections in the town centre is an integral part of the AAP and this change would undermine the policy.	No change	N/A
	LREP8.16	LAAP8		The two specific sites in LAAP8 are numbered incorrectly.	No changes are recommended. The numbering is correct	No change	N/A
	LREP8.17	Policy S10 part a		Allow community uses and health on the ground floor of Site S10.	No changes are recommended. Retail is proposed for this site by the AAP to support the vision to obtain Metropolitan status. While community, health and other social infrastructure uses may also be required in the town centre, the AAP does not suggest specific sites for such uses. Proposals for social infrastructure will be dealt with at the time of application.	No change	N/A
	LREP8.18	Policy S10 part a		Remove the need for comprehensive redevelopment of Site S10 to support phased delivery	Phasing the delivery of a site can be achieved as part of a comprehensive redevelopment plan.	No change	N/A

	LREP8.19	Policy S10 part b		of individual sites. Make the following amendment: “the redevelopment should mark the beginning of the commercial and retail heart of Lewisham town centre, while respecting the height, mass and bulk of local surroundings. It should create a new southern anchor for Lewisham High Street sense of arrival and should enhance and support the southern end of the high street to encourage customers to travel the full length of the High Street	No changes are recommended. The AAP delivery of a southern anchor is an important part of ensuring the continued viability of the southern part of the high street, therefore the change is not considered acceptable.	No change	N/A
	LREP8.20	Fig 5.1		Include Riverside Hall as Primary Shopping Area in Figure 5.1.	No changes are recommended. Figure 5.1 shows Primary Shopping Frontage, not Primary Shopping Area. Riverside Hall is currently a closed community hall with no public frontage and is therefore not Primary Shopping Area or Primary Shopping Frontage.	No change	N/A
Highways Authority (LREP9)	LREP9.1		Not stated	No comments		No change	N/A
Indigo Planning for Trademark Homes (LREP10) Note: This respondent requested to attend the oral part of the examination.	LREP10.1	Policy LAAP4.2b	Unsound Not effective	Should mention the emerging context of recent planning permissions. Add text as follows: “buildings must be of an appropriate scale, mindful of the immediate context and the importance of Loampit Vale as a major route without trying to compete with	Officers do not agree that the Lewisham Town Centre AAP is unsound. No changes are recommended. The AAP sets policy for sites, not for existing planning permissions. While developments under construction are noted, permissions are not a guarantee of delivery.	No change	N/A

	LREP10.2	Policy LAAP4.2d	Unsound Not effective	Lewisham Gateway (and approved planning permissions) 6-8m pavements can not and should not be achieved on all Town Centre sites. Add text as follows: “generous tree lined pavements of at least 6 to 8 metres in width to create boulevards on all primary routes ”	No changes are recommended. This is a town centre wide aim and is important in delivering the pedestrian access required to support the transport strategy.	No change	N/A
	LREP10.3	Policy LAAP4.2e	Unsound Not effective	Incorporating communal heating and cooling systems is not always possible and will depend on the characteristics of a particular site and the development proposal. Add text as follows: “buildings must incorporate communal heating and cooling systems and facilitate the Town Centre Area becoming a decentralised energy hub if feasible ”	No changes are recommended. This is a town centre wide aim and is important in delivering the environmental objective of the AAP. It is also supported by London Plan Policies 5.5 and 5.6. AAP Policy LAAP24 Carbon Dioxide Emission Reduction and the accompanying evidence base show that Loampit Vale is a potential future cluster for decentralised energy.	No change	N/A
	LREP10.4	Policy S5	Unsound Not effective	The site should not be commercially lead, but should be for mixed use as long as suitable re-provision of employment uses is made.	No changes are recommended. The Council feel that the most suitable approach to redevelopment is a commercial led scheme. However, residential or a mix of uses may be appropriate if it can be proved through sensitive design. This would be demonstrated and justified as part of a planning application.	No change	N/A
	LREP10.5	Policy S5	Unsound Not effective	Thurston Road should be flagged as an important route into and out of the town centre.	No changes are recommended. Thurston Road is a secondary route into the centre and is named so in the AAP.	No change	N/A
	LREP10.6	Para 4.13 and Policy LAAP22	Unsound Not justified	Comment that obligations through CIL will need to meet the tests (relates to site specific policy and	No changes are recommended. Paragraph 4.13 and LAAP22 are based on the current Section 106	No change	N/A

				LAAP22).	planning obligations system. The introduction of CIL will lead to changes in the responsibility for delivering the local priorities, but the priorities for using the contributions will remain.		
	LREP10.7	Policies LAAP11 and LAAP13.1	Unsound Not effective	Reflect that floorspace is not the only measure of employment space re-provision.	No changes are recommended. The policy requires the re-provision of employment floorspace. Any need for divergence from the policy should be evidenced and justified as part of the planning application process.	No change	N/A
	LREP10.8	Policy LAAP13.1	Unsound Not effective	Explain that constructing purpose built student accommodation frees up local market housing for others.	No changes are recommended. It is speculative and not proven by evidence that market housing in the environs of Lewisham town centre is currently used by students that would subsequently use purpose built student accommodation instead. It is equally plausible that the purpose built student accommodation will be used by students coming in from outside of the borough.	No change	N/A
	LREP10.9	Policy LAAP13.2.b	Unsound Not effective	Do not require a mix of accommodation sizes as some developments may be specifically undergrad (i.e. Halls of residence), whereas others may provide post-grad flats. The student housing market is different to the normal residential market.	Recommended for inclusion. Adjust Policy 13.2.b to read: "include a range of unit sizes and layouts, including with and without shared facilities, as appropriate ".	Main modification	MM19
	LREP10.10	Policy LAAP22	Unsound Not effective	Make specific reference to student housing and the need to understand the specific impacts of this type of development on the social infrastructure in an area (suggested it is less than normal resi).	No changes are recommended. As part of the move to the Community Infrastructure Levy system, the Council will be reviewing its Planning Obligations SPD. The requirements of student housing will be considered in	No change	N/A

					the review of this document. It is not considered necessary to make any additions to the AAP.		
Mr Narrainen (LREP11)	LREP11.1	General	Not stated	General support	Noted, no changes are recommended	No change	N/A
Mr Pope (LREP12)	LREP12.1	General	Not stated	Access to all TCAs should be easy for the blind and disabled and care should be taken to ensure that road traffic, bikes and pedestrians are kept separate using clear markings.	Noted, no changes are recommended. The London Plan Policy 7.2 supports an inclusive and accessible environment for those with disabilities and this approach is supported through Core Strategy Policy 15. Inclusive design principles are also promoted in AAP Policy LAAP18.	No change	N/A
Peacock and Smith for Centros (LREP13)	LREP13.1	Policy LAAP7 S8	Unsound Not effective Not consistent	Ladywell leisure centre site should not be restricted to 1,400 sqm retail as this is too prescriptive, against the Retail Capacity Study and is detrimental to its successful delivery.	Officers do not agree that the Lewisham Town Centre AAP is unsound. No changes are recommended. In considering the Ladywell leisure centre site, Nathaniel Lichfield & Partners completed the Retail Capacity Study in 2009 and subsequently produced further advice regarding this site in 2011. Both the study and the further advice form part of the evidence base for the AAP. The recommendation of NLP was to allow no more than 1,400sqm of retail on this site to protect existing retail sources in Lewisham and Catford town centres and the local parade in Ladywell Village.	No change	N/A
Ray Hall (LREP14)	LREP14.1	General	Not stated	Lewisham town centre has the potential to become a destination on the national and global stage, but the AAP does not do enough to	Comments are noted, but the Council do not believe this is the case. No changes are recommended	No change	N/A

	LREP14.2	Policy LAAP23 and Appendix 2		achieve it. Support for the townscape merit allocation on the corner off Lewis Grove and Lee High Road, but this should only be for the frontage, not the whole buildings.	No changes are recommended. The allocation is for the protection of the entire buildings, not just the frontage. The allocation is designed to protect these valuable town centre buildings, not allow for redevelopment.	No change	N/A
	LREP14.3	Policy LAAP23 and Appendix 2		In the section regarding the buildings of townscape merit, mention the importance of opening up the River Quaggy.	No changes are recommended. River Quaggy enhancements are required through the Lee High Road Town Centre Area policy.	No change	N/A
	LREP14.4	Section 4.1		Disapproval of the Lewisham Gateway scheme and the associated 'low h' road scheme. The AAP should look at an alternative approach.	No changes are recommended. The Lewisham Gateway site is included as a Strategic Site Allocation in the adopted Core Strategy. The scheme has received planning permission and implementation is taking place.	No change	N/A
TfL Planning (LREP15)	LREP15.1	LAAP21	Not stated	Add to the rationale for LAAP21 a sentence stating that "TfL will be consulted and closely involved in the design and, where applicable, approval from TfL sought, for works affecting the Transport for London Road Network and the Strategic Road Network.	Recommended for inclusion. Include a new paragraph following existing paragraph 5.80 to read: " <u>TfL will be consulted and closely involved in the design and, where applicable, approval from TfL sought, for works affecting the Transport for London Road Network and the Strategic Road Network</u> ".	Main modification	MM22
	LREP15.2	LAAP21		Add to the rationale for LAAP21 a sentence stating that "The London Plan identifies a southern extension to the Bakerloo Line and a southwards extension to the DLR from Lewisham. When these are progressed, it will be appropriate to assess the land use implications for the AAP".	Recommended for inclusion. Include a new paragraph following existing paragraph 5.80 to read: " <u>The London Plan identifies a southern extension to the Bakerloo Line and a southwards extension to the DLR from Lewisham. When these are progressed, it will be appropriate to assess the land use implications for the AAP</u> ".	Main modification	MM23

	LREP15.3	Section 4.1		Include plans for the “bus layover” site in the AAP in case the Lewisham Gateway scheme does not progress.	No changes are recommended. The Lewisham Gateway Site is a strategic site which is dealt with as part of the Core Strategy and therefore does not need to be included in any detail in the AAP. This includes the ‘bus layover’ site.	No change	N/A
	LREP15.4	Policy LAAP4 S3a, S3b, S4 and S5		Development of sites S4, S5, S3a and S3b for sensitive uses should take into account the proximity of the bus stand.	Recommended for inclusion. Add part 1c. to the Loampit Vale area policy, to state that “ <u>Consideration should be given to the proximity of the proposed ‘bus layover’ site (part of the Lewisham Gateway development) when planning for sensitive uses on adjacent sites</u> ”.	Main modification	MM13
	LREP15.5	Figures 3.6 and 4.2		Can the improved station access be achieved through the bus stand site?	Comment noted. No changes are recommended. This is an integral part of the Lewisham Gateway development discussions of which TfL have been involved.	No change	N/A
	LREP15.6	LAAP20		Amend the electric charging points standards to match the London Plan.	Recommend for inclusion. Adjust policy LAAP20 part 3 to read: “All new developments with more than 20 shopper, visitor and/or residential parking spaces will need to ensure that at least 5% of the bays have an electric charging point installed. <u>are required to comply with the London Plan regarding the provision of electric charging points.</u> Further, all accessible points must meet the Source London criteria so that they can become part of the London-wide network.	Main modification	MM20
	LREP15.7	LAAP20		The AAP should contain parking standards to reflect the London	No changes are recommended. The Core Strategy acknowledges that the	No change	N/A

	LREP15.8	Para 5.70		Plan. It should be explained that the parking strategy is reliant on the progression of sites in Conington Road and Thurston Road.	borough will use the London Plan parking standards, therefore it does not need to be repeated in the AAP. Recommend for inclusion. Amend paragraph 5.70 as follows: "It is hoped expected that the inclusion of public and shopper parking within the sites identified for redevelopment (as included in policy LAAP20 Part 2) will manage this requirement".	Main modification	MM21
TfL Property (LREP16)	LREP16.1	Policies LAAP3 S1 and LAAP8 S10	Not stated	Applications on sites S1 and S10 should include discussion with TfL property.	No change recommended. Contact with TfL will happen as a matter of course on these sites and where it is appropriate contact with TfL Property will happen through the application process, not as a matter of policy.	No change	N/A
Thames Water (LREP17)	LREP17.1	Section 6.1	Unsound Not effective Not consistent	Add the suggested paragraph regarding water supply and sewerage infrastructure to the implementation policy and supporting text.	Officers do not agree that the Lewisham Town Centre AAP is unsound. Recommend for inclusion. Add a new point (i) to policy LAAP26 as follows: " <u>working with Thames Water to deliver water supply and sewerage infrastructure</u> ". Also add the following text as a new paragraph 6.16: <u>Water Supply and Sewerage Infrastructure</u> <u>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</u>	Main modification	MM25

					<u>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 and 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.”</u>		
Theatres Trust (LREP18)	LREP18.1	Policies LAAP17 and LAAP22	Not stated	Support for policies LAAP17 and LAAP22.	Noted, no changes are recommended	No change	N/A
	LREP18.2	Section 4.1		Gateway should include proposals for a theatre as well as a cinema.	No changes are recommended. The Lewisham Gateway site is included as a Strategic Site Allocation in the adopted Core Strategy. The scheme has received planning permission and implementation is taking place.	No change	N/A