



London Borough of Lewisham Local Development Framework

Lewisham Town Centre Area Action Plan Development Plan Document (DPD)

Ref:

For official use only

Proposed Submission Stage Representation Form

**Please return your completed form to the London Borough of Lewisham by 5pm
Monday 23 April 2012**

- By post to
Planning Service
London Borough of Lewisham
5th Floor, Laurence House
1 Catford Road
London SE6 4RU

or

- By e-mail to planning.policy@lewisham.gov.uk

You may also make your representation online without the need to use this form.

- Online at <http://lewisham-consult.objective.co.uk/portal>

For further information, or to request extra representation forms please phone
020 8314 7400 or e-mail planning.policy@lewisham.gov.uk .

This form has two parts
Part A – Personal Details
Part B – Your representation(s).

Please fill in a separate sheet (Part B) for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title _____

First Name _____

Last Name _____

Job Title
(where relevant) _____

Organisation Trademark Homes Ltd
(where relevant)

Address Line 1 c/o Agent

Line 2 _____

Line 3 _____

Line 4 _____

Post Code _____

Telephone
Number _____

E-mail Address
(where relevant) _____

2. Agent's Details (if applicable)

Mr

Aaron

Peate

Indigo Planning

11 Swan Court

Worple Road

Wimbledon

SW19 4JS

02086059400

Aaron.Peate@indigoplanning.com

Part B – Please use a separate sheet for each representation

Name or Organisation: Indigo Planning

3. To which part of the Area Action Plan does this representation relate?

Paragraph _____ Policy LAAP4.2 Proposals Map _____

4. Do you consider the Area Action Plan is:

4.(1) Legally compliant Yes

4.(2) Sound* No

**The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form*

*If you have entered **No** to 4.(2), please continue to Q5.*

In all other circumstances, please go to Q6.

5. Do you consider the Area Action Plan is **unsound** because it is not:

✓ (2) Effective

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. *(Continue on a separate sheet /expand box if necessary)*

Policy 2.(b) states that 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 Lewisham Gateway. This policy should make specific reference to the emerging context that recent planning permissions will also create.

Policy 2.(d) states that 'generous tree lined pavements of at least 6 to 8 metres in width to create boulevards' should be provided. This cannot and should not be achieved on all sites within the Town Centre Area.

Policy 2.(e) states that 'buildings must incorporate communal heating and cooling systems and facilitate the Town Centre Area becoming a decentralised energy hub'. This is not always possible and will depend on the characteristics of a particular site and development proposal.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at point 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
(Continue on a separate sheet /expand box if necessary)

Policy 2 (b): An in bracket insertion of “(and approved planning permissions)” after immediate context could be deal with this.

Policy 2 (d) An insertion of “on primary routes” after boulevards could be deal with this.

Policy 2 (e) An insertion of “if feasible” at end could be deal with this.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at this stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

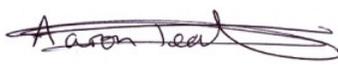
8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

✓ **Yes, I wish to participate at the oral examination**

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To add further evidence to the points made

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: 

Date: 23/04/2012

Part B – Please use a separate sheet for each representation

Name or Organisation: Indigo Planning

3. To which part of the Area Action Plan does this representation relate?

Paragraph _____ Policy LAAP4 S5 Proposals Map _____

4. Do you consider the Area Action Plan is:

4.(1) Legally compliant Yes

4.(2) Sound* No

**The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form*

*If you have entered **No** to 4.(2), please continue to Q5.*

In all other circumstances, please go to Q6.

5. Do you consider the Area Action Plan is **unsound** because it is not:

✓ (2) Effective

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. *(Continue on a separate sheet /expand box if necessary)*

Para 11: Policy S5 states that 'this is considered most appropriate for a commercially led mix of uses, although sensitive design could make some residential use acceptable. As has been accepted by the Council in relation to the planning permission at 52-54 Thurston Road for 62 residential units and 302 sqm of B1 floorspace, the provision of more significant levels and proportions of residential accommodation within the 'Railway Strip' is acceptable when suitably designed. For this reason, the policy should be for a mix of uses rather than weighted towards 'commercially-led' as long as suitable re-provision of employment uses is made. In addition, 'some residential use' underplays the role that residential uses can play on these sites which is in accordance with Policy LAAP10 which strongly encourages mixed use development with residential above.

Para 13: Whilst the policy refers to Thurston Road as a secondary route into the town centre, this down plays the importance of this route somewhat. The A2210 is the primary route into Deptford from Lewisham, sits within a key area for redevelopment which is visually and physically linked to the Lewisham Gateway proposals, and is less than 5 minutes walk from Lewisham train and bus station. The scale and massing of buildings should appreciate the specifics of this particular important route into and out of the town centre.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at point 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
(Continue on a separate sheet /expand box if necessary)

Para 11: S5 policy should be for a mix of uses rather than weighted towards 'commercially led' as long as suitable re-provision of employment uses is made.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at this stage.

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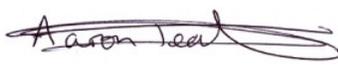
8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

✓ **Yes, I wish to participate at the oral examination**

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To add further evidence to the points made

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: 

Date: 23/04/2012

Part B – Please use a separate sheet for each representation

Name or Organisation : Indigo Planning

3. To which part of the Area Action Plan does this representation relate?

Paragraph 4.15 Policy_____ Proposals Map_____

4. Do you consider the Area Action Plan is:

4.(1) Legally compliant Yes
4.(2) Sound* No

**The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form*

*If you have entered **No** to 4.(2), please continue to Q5.
In all other circumstances, please go to Q6.*

5. Do you consider the Area Action Plan is **unsound** because it is not:

Justified

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. *(Continue on a separate sheet /expand box if necessary)*

Specific developer contributions are identified within this paragraph, in addition to those identified within Policy LAAP22. With any planning application, specific justification will need to be provided by the Council in relation to Community Infrastructure Levy (CIL) Regulations 2011 (as amended) and in particular paragraph 122(2). Specifically, why the obligation is necessary to make the development acceptable in planning terms; that it is directly related to the development; and that any resulting contribution is fairly and reasonably related in scale and kind to the development.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at point 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
(Continue on a separate sheet /expand box if necessary)

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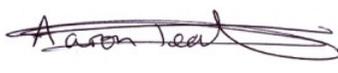
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✓ **Yes, I wish to participate at the oral examination**

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To add further evidence to the points made

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: 

Date: 23/04/2012

Part B – Please use a separate sheet for each representation

Name or Organisation : Indigo Planning

3. To which part of the Area Action Plan does this representation relate?

Paragraph _____ Policy LAAP11 Proposals Map _____

4. Do you consider the Area Action Plan is:

4.(1) Legally compliant Yes

4.(2) Sound* No

**The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form*

*If you have entered **No** to 4.(2), please continue to Q5.*

In all other circumstances, please go to Q6.

5. Do you consider the Area Action Plan is **unsound** because it is not:

✓ (2) Effective

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. *(Continue on a separate sheet /expand box if necessary)*

Para 2: Policy states 're-provide employment of an equal or greater floorspace'. On occasion, a net reduction in floorspace might be acceptable if the re-provision can bring equal or greater benefit in terms of quality of space and number and type of jobs created. In this instance, the dynamics of any re-provision must be understood and taken into the balance.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at point 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
(Continue on a separate sheet /expand box if necessary)

The policy should appreciate that floorspace is not the only determinant of adequate re-provision. This appreciation should be stipulated in the wording. The provisions relating to floorspace only is unsophisticated and should be broadened.

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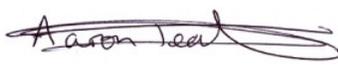
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✓ **Yes, I wish to participate at the oral examination**

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To add further evidence to the points made

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: 

Date: 23/04/2012

Part B – Please use a separate sheet for each representation

Name or Organisation : Indigo Planning

3. To which part of the Area Action Plan does this representation relate?

Paragraph _____ Policy LAAP13.1(a and b) Proposals Map _____

4. Do you consider the Area Action Plan is:

4.(1) Legally compliant Yes
4.(2) Sound* No

**The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form*

*If you have entered **No** to 4.(2), please continue to Q5.
In all other circumstances, please go to Q6.*

5. Do you consider the Area Action Plan is **unsound** because it is not:

✓ (2) Effective

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. *(Continue on a separate sheet /expand box if necessary)*

The policy fails to understand that the provision of designated student housing will free up permanent self-contained homes. Without purpose built student accommodation, students will utilise existing private rented accommodation, preventing this being available for other parts of the market.

Paragraph 1. (a) Seeks to prevent the net loss of employment space. On occasion, a net reduction in floorspace might be acceptable if the re-provision can bring equal or greater benefit in terms of quality of space and number and type of jobs created. In this instance, the dynamics of any re-provision must be understood and taken into the balance. This appreciation should be stipulated in the wording. The provisions relating to floorspace only is unsophisticated and should be broadened.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at point 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
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✓ **Yes, I wish to participate at the oral examination**

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To add further evidence to the points made

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Signature: 

Date: 23/04/2012

Part B – Please use a separate sheet for each representation

Name or Organisation : Indigo Planning

3. To which part of the Area Action Plan does this representation relate?

Paragraph _____ Policy LAAP13.2(b) Proposals Map _____

4. Do you consider the Area Action Plan is:

4.(1) Legally compliant Yes
4.(2) Sound* No

**The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form*

*If you have entered **No** to 4.(2), please continue to Q5.
In all other circumstances, please go to Q6.*

5. Do you consider the Area Action Plan is **unsound** because it is not:

✓ (2) Effective

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. *(Continue on a separate sheet /expand box if necessary)*

The policy fails to understand the student housing market properly and treats it like standard residential accommodation. Not every development will be able to provide a mix of sizes and layouts for management reasons and as the market will not provide this. For example, undergraduate accommodation e.g. halls of residences will be provided specifically for first year students with on-site catering. It would not therefore be appropriate to mix this with post-graduate self-contained flatted accommodation.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at point 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
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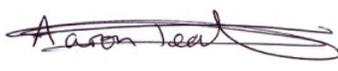
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Signature: 

Date: 23/04/2012

Part B – Please use a separate sheet for each representation

Name or Organisation : Indigo Planning

3. To which part of the Area Action Plan does this representation relate?

Paragraph _____ Policy LAAP22 Proposals Map _____

4. Do you consider the Area Action Plan is:

4.(1) Legally compliant Yes

4.(2) Sound* No

**The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form*

*If you have entered **No** to 4.(2), please continue to Q5.*

In all other circumstances, please go to Q6.

5. Do you consider the Area Action Plan is **unsound** because it is not:

✓ (2) Effective

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. *(Continue on a separate sheet /expand box if necessary)*

General developer contributions are identified within this paragraph. With any planning application, specific justification will need to be provided by the Council in relation to Community Infrastructure Levy (CIL) Regulations 2011 (as amended) and in particular paragraph 122(2). Specifically, why the obligation is necessary to make the development acceptable in planning terms; that it is directly related to the development; and that any resulting contribution is fairly and reasonably related in scale and kind to the development.

The specific impacts of student housing also needs to be appreciated. Student housing generates different and often reduced impacts compared to standard residential schemes. For example, the universities provide many facilities for their students e.g. healthcare and leisure and therefore no or limited impact will be put on local social infrastructure. The Council's SPD does not appreciate this difference at present and the AAP should not perpetuate this misunderstanding.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at point 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
(Continue on a separate sheet /expand box if necessary)

Specific reference should be inserted for student housing and the need to understand the specific impacts on this type of development on the social infrastructure within an area.

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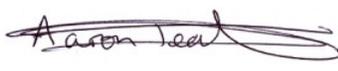
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To add further evidence to the points made

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

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