



Your Ref:  
Our Ref: 12/0114

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Dear Mr Regan

## **Lewisham Town Centre Area Action Plan**

Thank you for consulting (Transport for London) TfL on the Lewisham Town Centre Area Action Plan (AAP) proposed submission. We have the following comments from a policy (accordance with London Plan) and transport operations perspective. A separate response will be provided from the TfL Consents team, from a land ownership perspective.

### **Impact on TfL operations**

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

A number of policies and site allocations mention public realm improvements on the TLRN and SRN, for example Loampit Vale Town Centre Area, Lea High Road and site S8 (Ladywell Leisure centre site). Whilst TfL generally very support of public realm improvements, each proposal must consider all road users and the policy to smooth traffic and tackle congestion (London Plan Policy 6.11). Therefore the details of any development or scheme proposals affecting the TLRN and SRN should be consulted upon with TfL from an early stage, as it is likely that TfL approval will be required. Early TfL involvement is particularly important where junction improvements and/or new crossing facilities are proposed as these may have an impact on traffic flow.

The AAP should include a statement, in section 5 under rationale for Policy LAAP21 (Sustainable transport), that TfL will be consulted and closely involved in the design and, where applicable, approval from TfL sought, for works affecting the TLRN and SRN.

In particular, Policy LAAP21 section 3 lists proposals that affect the TLRN and as such will need to be agreed with TfL. There is also a need to take account what if any public funding is available, for example in the TfL Business Plan or through the Local Implementation Plan process.

### **Strategic Transport Schemes**

London Plan Policy 6.2 (Providing Public Transport Capacity and Safeguarding Land for Transport) identifies, and requires protection of, strategic transport schemes required to deliver the Plan that are likely to be progressed during the Plan period to 2031. Table 6.1 (supported by Policy 6.4 Enhancing London's Transport Connectivity) identifies a southern extension to the Bakerloo Line and a potential extension to the Docklands Light Railway (DLR) southwards from Lewisham. Although it is premature to identify specific sites that may be required to allow these proposals to be delivered, as the impacts on subsequent iterations of the Town Centre AAP could be significant.

In order to be in conformity with the London Plan, the AAP should include a statement, in section 5 under rationale for Policy LAAP21 (Sustainable transport), that the London Plan identifies a southern extension to the Bakerloo Line and a southwards extension of the DLR from Lewisham, and that as and when these are progressed, it will be appropriate to review the AAP for implications on land use.

### **Section 4 - Unallocated site in Thurston Road**

TfL suggest an unallocated site in Thurston Road (the site between S5 and S3b and to the north of S3a) is included within the AAP. It is part of the Lewisham Gateway scheme and as such planning permission exists for its use as a replacement bus stand for the facilities currently located within site S1. The development of the stand has not yet commenced but the site is vacant and if for any reason the Lewisham Gateway scheme does not proceed then an alternative use should be considered.

Development of sites S4, S5, S3a and S3b for sensitive uses should take into account the proximity of the bus stand.

The proposal for improved station access from Thurston Road, as illustrated on figures 3.6 and 5.4, needs to be reconciled with the use of this site as a bus stand.

### **Lewisham Gateway**

TfL have been closely involved in the Lewisham Gateway scheme, which will require a fundamental change in bus operation and the layout of the TLRN in the vicinity. As such, TfL are key consultees and will be required to give consent (for example for the highway works) The AAP advises that Lewisham Gateway is one of the five strategic site allocations in the Council's Core Strategy and thus a specific AAP policy is not necessary. Therefore no comment is made here.

### **Site S6 – Tesco’s block, car park and petrol station**

Connington Road has a bus stand and stops and as such any development of or at the site should retain these in-situ, or an alternative agreed with TfL.

### **Electric Vehicle Charging Points**

The figures quoted in policy LAAP20 section 3 (public parker and shopper parking spaces) for electric vehicle charging points do not accord with the standards contained in London Plan Policy 6.13 (parking). As such, the AAP should be amended to be in conformity with the London Plan.

### **Car Parking**

It would be useful for the AAP to contain parking standards for the main use classes. These standards should accord with London Plan policy 6.13 (Parking). As Lewisham town centre has a high PTAL, it would be expected that the parking standards are at the more restrictive end of borough wide standards.

It is understood that the Tesco store (Conington Road) does not have publically available car parking and is only for Tesco shoppers. Also the Thurston Road car parking (west gateway) is reliant upon redevelopment. The AAP could make it clear that the strategy for public parking will only be deliverable if and when the relevant sites are redeveloped and therefore it will take time to realise.

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

Yours sincerely



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