



Public Examination of Lewisham Town Centre Local Plan

London Borough of Lewisham response on the Inspector's Initial Question 5: Major Modifications.

Note the full text of the Inspector's questions are on the Examination website and can be accessed via the following link:

<http://www.lewisham.gov.uk/myservices/planning/policy/Documents/SA%20Inspector%27s%20queries.pdf>

Planning Policy -16th November 2012

Council Response

1. Introduction

1.1 This paper responds to the Inspectors initial question 5 in relation to the Lewisham Town Centre Local Plan (LTCLP). Reference to documents LTCLP 1.7; 1.7a and 1.9 refer to the Examination Library reference system.

1.2 The Council acknowledges that 'main modifications' should only address matters of soundness or legal compliance as specified in S20 (7C) of the Planning & Compulsory Purchase Act 2004 (as amended). The Council also acknowledges that the submitted version of the 'Schedule of recommended main modifications to the LTCLP' (Examination Library reference LTCLP 1.7) contained recommended modifications that did not relate to soundness and therefore should have been included in the 'Schedule of recommended additional modifications to the LTCLP', (Examination Library reference LTCLP 1.7a).

1.3 To clarify this issue the Council has reviewed its approach to recommending modifications as either 'main' or 'additional' modifications. The latter 'additional modifications' refers to modifications that the Council consider, taken together, do not materially affect the policies set out in the LTCLP, as specified in the 2004 Act (as amended).

1.4 The Council has reviewed and suggested changes to the following documents:

- LTCLP1.7 Schedule of recommended main modifications to the LTCLP
- LTCLP1.7a Schedule of recommended additional modifications to the LTCLP
- LTCLP1.9a Summary of proposed submission representations with officer comments

2. Schedule of recommended 'main modifications' to the LTCLP (Examination Library reference LTCLP 1.7)

2.1 Having reviewed LTCLP1.7 the Council considers that there are only three 'main modifications', which are all considered by the Council to be required as a matter of plan soundness and or legal compliance. These are as follows:

- MM1 – The addition of policy LTC0 ‘Presumption in favour of sustainable development’ in order to be consistent with the NPPF (Para. 14).
- MM2 – The correction of the designation of the Conington Road Town Centre Area from ‘edge of centre’ to ‘out of centre’ in order to be consistent with the NPPF (Para. 23 and Annex 2), as requested by GL Hearn on behalf of Land Securities in response to the Proposed Submission version consultation.
- MM3 – The inclusion of ‘Appendix 5: UDP proposals replaced by the LTCLP’ in order to be consistent with The Town and Country Planning (Local Planning) (England) Regulations 2012 (Part 4 8.(5)).

3. Schedule of recommended ‘additional modifications’ to the LTCLP (Examination Library reference LTCLP 1.7a)

3.1 Having reviewed LTCLP 1.7a the council now consider that an extra 24 ‘additional modifications’ be added to LTCLP 1.7a, as the Council considers that they do not raise issues of soundness or of legal compliance.

4. Proposed changes to LTCLP 1.7, 1.7a and 1.9a

4.1 As a consequence of the above review the Council now propose a revised ‘schedule of main modifications’ which is set out as appendix 1 to this response and a revised ‘schedule of additional modifications’ which is set out as appendix 2 to this response.

4.2 The Council has made amendments to the ‘Reason for change’ column in both of the proposed replacement schedules in order to ensure that there are clear reasons why each modification is included.

4.3 In order to consistently reflect the amendments listed above the Council has produced an amended version of the ‘Summary of proposed submission representations with officer comments’, Examination Library reference LTCLP 1.9a. This revised document is set out as appendix 3 to this response. In addition to the amendments discussed above, the Council has also clarified in appendix 3 when a representation states that a comment is a matter of soundness and when the Council now believe a comment is a matter of soundness.

5. Conclusion

5.1 The Council has reviewed the ‘schedule of main modifications’, LTCLP 1.7 and the ‘schedule of additional modifications’, LTCLP 1.7a, in response to the Inspectors initial question. The council considers that to comply with the PCPA 2004 (as amended) it is necessary to make changes to these documents and consequential changes to LTCLP 1.9a. The Council’s suggested changes are set out in the three appendices to this response.

5.2 The Council has not yet added the proposed replacement versions of LTCLP1.7, 1.7a and 1.9a to the ‘Examination Library’, but will do so if the Inspector considers it appropriate.



Schedule of recommended main modifications to

Lewisham town centre Area Action Plan

(Proposed replacement version following the Inspectors Question number 5)

November 16th 2012

Schedule of recommended main modifications to Lewisham town centre Area Action Plan (Proposed Submission version)

Recommended main modifications

Table 1 details the main modifications that the Council are recommending to be made to the Proposed Submission version of the Lewisham Town Centre AAP. The Council consider that the following main modifications are required as a result of a representation made to the Proposed Submission version consultation, as a response to the National Planning Policy Framework (published in March 2012) and to fix an omission in the Proposed Submission version.

The recommended modifications have been assessed by the Council and are not considered to change the intent of any policy significantly. Therefore, there has been no reason to make any changes to the existing versions of supporting documents, including the Sustainability Appraisal (LTCLP1.2), the Appropriate Assessment (LTCLP1.3), the Equalities Analysis Assessment (LTCLP1.5) or the Proposals Map Changes Document (LTCLP1.6).

Table 1: Recommended main modifications

Ref	Page (in tracked modifications version)	Paragraph/ policy/ section/ figure	Amendment/recommended modification (deleted text is in struck through ; new text is in bold and <u>underline</u>)	Reason for change	Suggested by
MM1	25	New Section 3 (note that in the track changes version of the submitted plan, this change is not added as a new section to avoid the confusion of changing section and paragraph numbers.	<i>(for insertion after page 20)</i> <u>Presumption in favour of sustainable development</u> <u>The NPPF states that Local Plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally (paragraphs 14 and 15). To support this approach, all policies in the LTCLP should be read in the context of Policy LTC0 – Presumption in favour of sustainable development.</u> <u>Policy LTC0 – Presumption in favour of</u>	The Council consider that this modification is required in order to make the submitted plan sound. The addition of policy LTC0 'Presumption in favour of sustainable development' is required to make the LTCLP consistent with the NPPF (Para. 14).	LBL

Schedule of recommended main modifications to Lewisham town centre Area Action Plan (Proposed Submission version)

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		The text is shown at the start of section 3 where it would form a new section in the final document)	<p><u>sustainable development</u> <u>When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants to find solutions which mean that proposals secure development that improves the economic, social and environmental conditions in the borough.</u></p> <p><u>Planning applications that accord with the policies in the Lewisham Local Plan (and, where relevant, with polices in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.</u></p> <p><u>Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</u></p> <ul style="list-style-type: none"> <u>• Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</u> 		

Schedule of recommended main modifications to Lewisham town centre Area Action Plan (Proposed Submission version)

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			<p>• <u>Specific policies in that Framework indicate that development should be restricted.</u></p>		
MM2	48	Section 4.3	<p>".....This edge of centre <u>out of centre</u> Town Centre Area.....".</p>	<p>The Council consider that this modification is required in order to make the submitted plan sound. The correction of the designation of the Conington Road Town Centre Area from 'edge of centre' to 'out of centre' is required to make the LTCLP consistent with the NPPF (Para. 23 and Annex 2), as requested by GL Hearn on behalf of Land Securities in response to the Proposed Submission version consultation.</p> <p>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'.</p>	GL Hearn for Land Securities
MM3	146	-	<p><u>Appendix 5: UDP proposals replaced by the LTCLP</u></p> <p><u>The following table lists the development sites, as shown in UDP Schedule 1 and on the UDP Proposals Map, that have been implemented or amended so far by changing circumstances as to be replaced by new sites. There is no need to show these sites on the Proposals Map and the site references can be deleted.</u></p> <p><i>See table below to be added as Appendix 5: UDP proposals replaced by the LTCLP</i></p>	<p>The Council consider that this modification is required in order to make the submitted plan sound. This appendix was incorrectly omitted from the proposed submission version of the LTCLP and requires inclusion in order for the plan to be consistent with The Town and Country Planning (Local Planning) (England) Regulations 2012 (Part 4 8.(5)).</p>	LBL
Appendix 5: UDP proposals replaced by the LTCLP.					

Schedule of recommended main modifications to Lewisham town centre Area Action Plan (Proposed Submission version)

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<u>37</u>		<u>Lewisham Passenger Transport Interchange site</u>			
<u>39</u>		<u>Lewisham Town Centre – Odeon Site</u>			
<u>40</u>		<u>Lewisham Town Centre – Riverdale</u>			
<u>40a</u>		<u>206 – 210 Lewisham High Street and 'Model Market', SE13</u>			



Schedule of recommended additional modifications to

Lewisham town centre Area Action Plan

(Proposed replacement version following the Inspectors Question number 5)

November 16th 2012

Schedule of recommended additional modifications to Lewisham town centre Area Action Plan (Proposed Submission version)

The Council consider that the following additional modifications are required as a result of a combination of representations made to the Proposed Submission version consultation, responses to the National Planning Policy Framework (published in March 2012) and to fix a number of errors or omissions in the Proposed Submission version.

The recommended modifications have been assessed by the Council and are not considered to change the intent of any policy significantly. Therefore, there has been no reason to make any changes to the existing versions of supporting documents, including the Sustainability Appraisal (LTCLP1.2), the Appropriate Assessment (LTCLP1.3), the Equalities Analysis Assessment (LTCLP1.5) or the Proposals Map Changes Document (LTCLP1.6).

Document wide recommended additional modifications

1. The National Planning Policy Framework (NPPF) was published in March 2012, establishing new national policy guidance and making a number of minor changes to the nomenclature associated with planning at a local level. In order to reflect the latest nomenclature it is recommended to complete the modifications detailed in Table 1. These changes will be required multiple times in the document, but to reduce confusion they have not been listed individually.

The exception to this is 'Section 1.4 – How does the Area Action Plan relate to other policy?', which has been fully modified to reflect the most up to date policy context, including Figure 1.4.

Table 1: Document wide recommended additional modifications

Nomenclature used in the proposed submission Lewisham Town Centre Area Action Plan (March 2012)	Nomenclature recommended for the adoption Lewisham Town Centre Local Plan
Lewisham Town Centre Area Action Plan	Lewisham Town Centre Local Plan
AAP	LTCLP
Development Plan Document / DPD	Local Plan

2. Policies in the Area Action Plan are currently named LAAP1 to LAAP27. These will be renamed as LTC1 to LTC27.

Schedule of recommended additional modifications to Lewisham town centre Area Action Plan (Proposed Submission version)

3. As a result of the main and additional modifications recommended, numbers for paragraphs, figures and appendices will require amending to accommodate the additions and deletions of text.

Schedule of recommended additional modifications to Lewisham town centre Area Action Plan (Proposed Submission version)

Specific recommended additional modifications

Table 2: Specific recommended additional modifications

Ref	Page (in tracked modifications version)	Paragraph/ policy/ section/ figure	Amendment/recommended modification (deleted text is in struck through ; new text is in bold and <u>underline</u>)	Reason for modification	Suggested by
AM1	12	Statement	The Lewisham town centre AAP is in general conformity with the London Plan 2011, implements the Lewisham Core Strategy and has been prepared having regard to relevant national planning policies and guidance is consistent with the National Planning Policy Framework (NPPF).	In response to the National Planning Policy Framework, published in March 2012.	LBL
AM2	12	Figure 1.4	<i>(modifications to the whole diagram to reflect the changes in the national policy context)</i>	In response to the National Planning Policy Framework, published in March 2012.	LBL
AM3	14	Para 1.33	The AAP supersedes the saved UDP policies and site allocations proposals as they apply to Lewisham town centre (as identified in Appendix 6: UDP Proposals replaced by the LTCLP) and all other adopted guidance, including the Lewisham Gateway Planning Brief (2002).	This appendix was incorrectly omitted from the proposed submission version of the LTCLP.	LBL
AM4	14	Para 1.37 - 1.39	1.37 The main national policy context for the AAP is provided by Planning Policy Statement 4 (PPS4) which regards Sustainable Economic Development, including the growth of town centres. It states that new economic growth should focus on existing centres and similar to the London Plan encourages the use of available brownfield land to provide high density development where public transport, cycling and walking access is high. 1.38 Further national policy context is provided	In response to the National Planning Policy Framework, published in March 2012.	LBL

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			<p>by PPS3 (housing), while PPS5 provides context for the protection of a number of heritage concerns in the town centre. Additional guidance includes that regarding climate change, transport, open space, biodiversity, recreation, energy, pollution and flood risk.</p> <p>1.39 It should be noted that this AAP is informed by the Government's draft National Planning Policy Framework which will, when finalised, replace previous national planning policy guidance.</p> <p><u>The national policy context for the LTCLP is provided by the National Planning Policy Framework (NPPF), published in March 2012. The LTCLP is consistent with the NPPF.</u></p>		
AM5	21	Objective 2	<p>Objective 2 – Housing: To deliver up to 2,300 additional new homes by 2016 and a further 800 <u>1,100</u> additional new homes by 2021 to create a sustainable and mixed community of private and affordable housing in line with the Core Strategy, with highest densities focused in locations with the highest level of public transport accessibility.</p>	To correct an error in the proposed submission version that stated that the homes to be delivered between 2016 and 2021 was 800. It was in fact 1,100 homes. The total of 3,400 new homes in the plan period equals the sum of the indicative capacities for each Town Centre Area and the housing units already delivered in the town centre.	LBL
AM6	31	Para 3.11	<p><i>(for insertion after the second paragraph 3.11, that needs to be amended to be called paragraph 3.13)</i></p> <p><u>The six Town Centre Areas identified above and explored in Section 4 are allocated indicative development capacities for the potential delivery of housing. For Town</u></p>	To identify the total housing and retail development expected and compare this expectancy to the LTCLP vision.	LBL

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			<p><u>Centre Area detail see Sections 4.1 to 4.6. The town centre wide total of the indicative capacities for housing is 2,420 which is 980 below the total development required by Objective 2 of 3,400. However 977 housing units are under construction or have already been delivered, meaning the total new homes for delivery in the town centre will be 2,420 plus 977 which equals 3,397.</u></p> <p><u>The Core Strategy (June 2011) states that up to 2,600 houses are to be accommodated in Lewisham town centre over the plan period (2011 – 2026). The Core Strategy designated homes only to the sites which were known, available and developable at the time in order to ensure the plan was deliverable. The increase in potential housing delivery in the LTCLP is mainly due to the identification of additional sites in the Conington Road, Central and Ladywell Town Centre Areas and the minor reassessment of the capacity of Loampit Vale and Lee High Road Town Centre Areas. No changes have been made to the capacities of individual development sites that were included in the calculation of the Core Strategy designation.</u></p> <p><u>The same capacity approach is used for retail floorspace. LTCLP Objective 1 identifies a requirement for 44,000sqm of new retail floorspace, while the indicative capacities of the six Town Centre Areas in</u></p>		

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			<p><u>Section 4 equate to 44,500sqm. There has been 3,050sqm of additional retail space already delivered, meaning the total new retail floorspace to be delivered is 47,550sqm.</u></p> <p><u>The Core Strategy (June 2011) states that up to 40,000sqm of retail floorspace is to be accommodated in the town centre. It is the emergence of a site previously not included in the Core Strategy that has caused the increase in deliverable space. The site is Lewisham Shopping Centre which is capable of delivering 10,000sqm of new space. All other town centre development sites considered in both the Core Strategy and all the LTCLP are expected to deliver the same or a very similar quantum of retail floorspace.</u></p>		
AM7	39	Para 4.4	The Lewisham Gateway TCA will <u>seek to</u> deliver the following:	In response to Land Securities concerns about the objectives for the Gateway Town Centre Area.	GL Hearn for Land Securities
AM8	43	Section 4.2 Para 4.8and 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.....	In response to Land Securities concerns about the impact of new retail on the Primary Shopping Area.	GL Hearn for Land Securities
AM9	43	Section 4.2 Key area objectives	This is dealt with by change no. AM9	In response to Land Securities concerns about the impact of new retail on the Primary Shopping Area.	GL Hearn for Land Securities
AM10	44	Policy LAAP4 S3a, S3b, S4 and S5	<u>Consideration should be given to the proximity of the proposed 'bus layover' site (part of the Lewisham Gateway</u>	In response to a request from TfL to acknowledge the impact of the proposed 'bus layover' site on surrounding sites.	TfL Planning

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			<u>development</u>) when planning for sensitive <u>uses on adjacent sites.</u>		
AM11	45	Policy S5	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.	In response to Land Securities concerns about the clarity of the policy.	GL Hearn for Land Securities
AM12	48	Para 4.17	The Conington Road Town Centre Area has the following indicative capacity: - 400 <u>250</u> homes	To correct an error in the proposed submission version that stated that the remaining indicative capacity of the Conington Road Town Centre Area was 400 homes. It was in fact 250 homes, as paragraph 4.15 identifies the previously included Venson Site (132 homes) as complete and hence removed from the remaining indicative capacity.	LBL
AM13	48	Section 4.3 Key area objectives	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.	Clarification of the acceptable retail provision in the policy in response to Land Securities concerns.	GL Hearn for Land Securities
AM14	49	Policy LAAP5 para 2	Development involving underground parking, retail expansion <u>of the existing store</u> (up to 3,000m additional floorspace).	Clarification of the acceptable retail provision in the policy in response to Land Securities concerns.	GL Hearn for Land Securities
AM15	60	Policy LAAP7 3(d)	Proposals could include the redevelopment of Lewisham Free School <u>Lewisham Opportunity Pre-School</u> , subject to the allowance being made for alternative provision of equivalent benefit to the community (see LTC COM3).	To correct an error in the proposed submission version of the LTCLP and an outdated reference to a previous policy version.	LBL
AM16	64	Para 4.49	10,000 sqm net retail / <u>leisure</u> space	To correct an omission from the proposed submission version of the LTCLP.	LBL
AM17	73	Policy	In particular, residential development located	To correct an omission from the proposed	LBL

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		LAAP10	above ground floor retail and commercial uses will be supported (<u>providing it meets policy LAAP11</u>).	submission version of the LTCLP.	
AM18	76	Policy LAAP13.2.b	Include a range of unit sizes and layouts, including with and without shared facilities, <u>as appropriate</u> .	In response to Trademark Homes concerns that a range of unit sizes may not always be appropriate.	Indigo Planning for Trademark Homes
AM19	78	Policy LAAP13 1(b)	Prejudice the Council's ability to meet it's <u>the</u> London Plan target for delivery of self-contained homes, <u>or</u>	To correct two typographical errors in the proposed submission version of the LTCLP.	LBL
AM20	84	Policy LAAP17 1(b)	the proposal would contribute positively to the character of the particular area, as outlined in the LAAP16.	To correct two typographical errors in the proposed submission version of the LTCLP.	LBL
AM21	91	Policy LAAP20	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.	In response to a correction identified by TfL.	TfL Planning
AM22	92	Para 5.70	It is hoped <u>expected</u> that the inclusion of public and shopper parking within the sites identified for redevelopment (<u>as included in policy LAAP20 Part 2</u>) will manage this requirement.	In response to a request from TfL to clarify the town centre approach to public and shopper parking.	TfL Planning
AM23	94	New para after 5.80	<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</u>	Request from TfL to acknowledge the requirement to involve them in planning where appropriate.	TfL Planning

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			<u>Strategic Road Network.</u>		
AM24	94	New para after 5.80	<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>	In response to a request from TfL to clarify the approach to future transport planning.	TfL Planning
AM25	97	Policy LAAP22	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 <u>and policing and other emergency services.</u>	In response to CGMS concerns about the services included as infrastructure.	CGMS for The Mayors Office for Policing and Crime / Metropolitan Police Service
AM26	110 and 112	Section 6.1	Add new point (i) to policy LAAP26 as follows: <u>(i) 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 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</u>	In response to a request from Thames Water to outline in Section 6.1 - Implementation, the requirements for developers to deliver water supply and sewerage infrastructure.	Thames Water

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			<u>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>		
AM27	113	Para 6.16	Government guidance legislation outlines a clear requirement for monitoring to be a central part of the plan-making process. Further, it is vital to the implementation process for the Council to understand if the AAP is successfully delivering the vision and objectives. To achieve this the Council will be using the 'plan, monitor, review' approach as advised by PPS12. <u>the plan, monitor, review approach as set out in the Lewisham Annual Monitoring Report.</u>	In response to the National Planning Policy Framework, published in March 2012.	LBL
AM28	115	After Para 6.26	<u>If one or two smaller sites experience delays in delivery in the plan period, the vision of the LTCLP could still be met due to the quantum of delivered development and the flexibility of site indicative capacities to allow for individual site circumstances. In the event of the widescale failure of delivery of sites, the Council would undertake a review of the surrounding circumstances, it's evidence base and ultimately a full review of the LTCLP to understand what changes are required to produce a deliverable local plan.</u>	Additional paragraph to clarify the approach to development site contingency.	LBL
AM29	117	Appendix 1	<i>See modification to table Appendix 1, column</i>	In response to the National Planning Policy	LBL

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			<i>five "national policy" which is included as a separate table at the end of this schedule.</i>	Framework, published in March 2012.	
AM30	118	Para 6.32	As with national and regional policy, the local evidence base is another component informing the preparation of the Core Strategy LTCLP.	To correct an error in the proposed submission version of the LTCLP.	LBL
AM31	136	Glossary – Annual Monitoring Report	A report submitted to the Government by local authorities or regional planning bodies assessing progress with and the effectiveness of a Local Development Framework. A report produced by the Local Authority to assess progress with and the effectiveness of the Local Development Framework.	This definition was incorrectly omitted from the proposed submission version of the LTCLP.	LBL
AM32	136	Glossary – Area Action Plan	Area Action Plan (AAP) A type of Development Plan Document focused on a specific location of an area subject to conservation or major change (for example major regeneration).	In response to the National Planning Policy Framework, published in March 2012.	LBL
AM33	136	Glossary – Community Infrastructure Levy	<u>Community Infrastructure Levy (CIL)</u> <u>A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area.</u>	This definition was incorrectly omitted from the proposed submission version of the LTCLP.	LBL
AM34	137	Glossary – Decentralised Energy	<u>Decentralised Energy</u> <u>Local renewable energy and local low- carbon energy usually but not always on a relatively small scale encompassing a diverse range of technologies.</u>	This definition was incorrectly omitted from the proposed submission version of the LTCLP.	LBL

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AM35	137	Glossary – Development Plan	Development Plan This includes adopted Local Plans, neighbourhood plans and the London Plan, and is defined in section 38 of the Planning and Compulsory Purchase Act 2004.	In response to the National Planning Policy Framework, published in March 2012.	LBL
AM36	137	Glossary – Development Plan Document	A Local Development Document that has been <u>drawn up by the local planning authority in consultation with the community, has been</u> subject to independent testing and has the weight of development plan status. Replaces the Local Plans system. <u>The terminology 'Development Plan Document' has been replaced with 'Local Plan' for new documents, but remains for pre-existing documents (i.e. Lewisham Core Strategy DPD, 2011).</u>	In response to the National Planning Policy Framework, published in March 2012.	LBL
AM37	137	Glossary – Edge of centre	<u>Edge of Centre</u> <u>For retail purposes, a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.</u>	In response to the National Planning Policy Framework, published in March 2012.	LBL

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AM38	138	Glossary – Local Development Document	Local Development Document (LDD) Sits within the LDF portfolio and comprises Development Plan Documents (DPDs) <u>and</u> Local Plans that have been subject to independent testing and have the weight of development plan status and Supplementary Planning Documents (SPDs) which are not subject to independent testing and do not have development plan status.	In response to the National Planning Policy Framework, published in March 2012.	LBL
AM39	139	Glossary – Local Plan	Local Plan <u>A Local Development Document that has been drawn up by the local planning authority in consultation with the community, has been subject to independent testing and has the weight of development plan status.</u>	In response to the National Planning Policy Framework, published in March 2012.	LBL
AM40	139	Glossary – NPPF	National Planning Policy Framework (NPPF) <u>The National Planning Policy Framework sets out the Government’s planning policies for England and how these are expected to be applied.</u>	In response to the National Planning Policy Framework, published in March 2012.	LBL
AM41	139	Glossary – Out of centre	Out of Centre <u>A location which is not in or on the edge of a centre but not necessarily outside the urban area.</u>	In response to the National Planning Policy Framework, published in March 2012.	LBL
AM42	139	Glossary – Planning Obligation	Planning Obligation <u>A legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.</u>	This definition was incorrectly omitted from the proposed submission version of the LTCLP.	LBL

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AM43	140	Glossary – PPS/PPG	Planning Policy Statement (PPS)/Planning Policy Guidance (PPG) Planning Policy Statements (PPSs) (and their predecessors Planning Policy Guidance Notes) are prepared by the Government after public consultation to explain statutory provisions and provide guidance to local authorities and others on planning policy and the operation of the planning system. They also explain the relationship between planning policies and other policies which have an important bearing on issues of development and land use. Local authorities must take their contents into account in preparing plans. The guidance may also be relevant to decisions on individual planning applications and appeals.	In response to the National Planning Policy Framework, published in March 2012.	LBL
AM44	140	Glossary – Previously Developed Land/Brownfi eld Land	<u>Previously Developed Land/Brownfield Land which is or has been occupied by a permanent structure (excluding agriculture and forestry buildings) and associated fixed surface infrastructure. The definition covers the curtilage of the development. Previously developed land may occur in both built up and rural settings. The definition includes defence buildings and land used for mineral extraction and waste disposal, where provision for restoration has not been made through development control procedures.</u>	This definition was incorrectly omitted from the proposed submission version of the LTCLP.	LBL
AM45	140	Glossary – Primary and secondary frontages	<u>Primary and secondary frontages Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods.</u>	This definition was incorrectly omitted from the proposed submission version of the LTCLP.	LBL

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Ref	Page (in tracked modificatio ns version)	Paragraph/ policy/ section/ figure	Amendment/recommended modification (deleted text is in struck through ; new text is in bold and <u>underline</u>)	Reason for modification	Suggested by
			<u>Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.</u>		
AM46	140	Glossary – Public Transport Accessibility Level (PTAL)	<u>Public Transport Accessibility Level (PTAL)</u> <u>A standard method used in London to calculate access level of geographical areas to public transport. The result is a grade from 1-6 (including sub-divisions 1a, 1b, 6a and 6b), where a PTAL of 1a indicates extremely poor access to the location by public transport and a PTAL of 6b indicates excellent access by public transport. More parking is generally allowed in areas with a low PTAL i.e. poor public transport and vice versa - and that also relate the allowed density of development to PTAL (i.e. areas with better public transport may have higher density housing or offices).</u>	This definition was incorrectly omitted from the proposed submission version of the LTCLP.	LBL
AM47	141	Glossary – Strategic Flood Risk Assessment (SFRA)	Strategic Flood Risk Assessment (SFRA) An assessment usually under taken by a local authority at a borough-wide level that considers flood risk, both fluvial and tidal, and examines the risks involved for developing certain areas within the borough in accordance with Planning Policy Statement 25 <u>the NPPF. The Lewisham SFRA was produced by Jacobs and published in July 2008. Areas/sites are categorised as falling within one or more of the following flood zones:</u> <u>Flood Zone 1 Low probability of flooding. Defined as land outside flood zone 2 and having less than 1 in 1000 annual probability</u>	Detail from this definition was incorrectly omitted from the proposed submission version of the LTCLP. Additionally, there is one modification in response to the National Planning Policy Framework, published in March 2012.	LBL

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			<p><u>of river or sea flooding in any year (<0.1%)</u> <u>Flood Zone 2 Medium probability of flooding. Defined as land having between 1 in 100 and 1 in 1000 annual probability of river flooding (1% - 0.1%) or between a 1 in 200 and 1 in 1000 annual probability of sea flooding (0.5% - 0.1%) in any year</u> <u>Flood Zone 3a High probability of flooding. Defined as land having 1 in 100 or greater annual probability of river flooding</u> <u>Flood Zone 3b Land where water has to flow or be stored in times of flood. Defined as land having a 1 in 20 (5%) or greater annual probability of flooding in any year; or is designed to flood in an extreme (0.1%) flood, or at another probability to be agreed between the local authority and the Environment Agency.</u></p>		
AM48	141	Glossary – Supplementa ry Planning Document	<p><u>Supplementary Planning Document (SA) Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.</u></p>	This definition was incorrectly omitted from the proposed submission version of the LTCLP.	LBL
AM49	142	Glossary – Town centre	<p><u>Town Centre Area defined on the local authority's proposal map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area.</u></p>	In response to the National Planning Policy Framework, published in March 2012.	LBL

Schedule of recommended additional modifications to Lewisham town centre Area Action Plan (Proposed Submission version)

Ref	Page (in tracked modificatio ns version)	Paragraph/ policy/ section/ figure	Amendment/recommended modification (deleted text is in struck-through ; new text is in bold and <u>underline</u>)	Reason for modification	Suggested by
AM50	142	Glossary – Waterlink Way	<u>Waterlink Way</u> <u>A long distance cycle/pedestrian route</u> <u>following the River Ravensbourne from the</u> <u>south of the borough to the Thames at</u> <u>Deptford.</u>	This definition was incorrectly omitted from the proposed submission version of the LTCLP.	LBL

Schedule of recommended additional modifications to Lewisham town centre Area Action Plan (Proposed Submission version)

Additional modifications to Appendix 1: Policy, guidance and evidence base linkages

		Relevant policies			
Code	Lewisham AAP	Core Strategy	London Plan and other regional guidance	National policy	Other guidance documents and evidence base
Overview policies					
LAAP1	Town centre boundary		Policy 2.15 Part D	PPS4 Sustainable Development NPPF Section 2	Overarching evidence documents for all policies Shaping Our Future: Lewisham Sustainable Community Strategy 2008 – 2020 Lewisham Infrastructure Delivery Plan, 2010
LAAP2	Spatial strategy	Spatial Policy 2	Policies 2.3, 2.13, 2.15 Part C	PPS1 Sustainable Development, PPS4 Planning for Sustainable Economic Growth NPPF Section 2	
Town centre area policies					
LAAP3	TCA Policy – Lewisham Gateway	Spatial Policy 2 Strategic Site Allocation 6 CS Policies 3, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 18, 19 and 20	Policies 2.3, 2.13, 2.15 Parts A, C and D, 3.3, 3.7, 3.16, 3.17, 3.18, 3.19, 4.1, 4.2, 4.3, 4.6, 4.7, 4.8, 4.9, 5.2, 5.3, 5.5, 5.6, 6.2, 6.3, 7.1, 7.3, 7.4	PPS1 Sustainable Development, PPS3 Housing, PPS4 Planning for Sustainable Economic Growth, PPS6 Planning for the Historic Environment, PPG13 Transport, PPG17 Planning for Open Space, Sport and Recreation, PPS22 & PPS25 NPPF Sections 1, 2, 4, 6, 7, 8, 10, 11 and 12	Housing Lewisham Strategic Housing Market Assessment, 2008 South East London Boroughs' Strategic Housing Market Assessment, 2009 Employment land Lewisham Employment Land Study, 2008 Retail and town centres Lewisham Retail Needs Study, 2009 Town Centre Health Checks, 2009 Renewables and energy Lewisham Renewables Evidence Base Study, 2009 LBL Energy Strategy, 2011 Waterways and flooding Lewisham Strategic Flood Risk Assessment, 2008 Lewisham Sequential Test, 2009 Open space Lewisham Leisure and Open Space Study, 2009 Ravensbourne River Corridor Improvement Plan, 2009 Lewisham Physical Activity, Sport and Leisure Strategy, 2006 Transport Lewisham Borough-wide Transport Assessment, 2009 Lewisham Town Centre Transport Study, 2009 Lewisham Local Implementation Plan, 2009 Design
LAAP4	TCA Policy – Loampit Vale				
LAAP5	TCA Policy – Conington Road				
LAAP6	TCA Policy – Lee High Road				
LAAP7	TCA Policy – Ladywell				

Schedule of recommended additional modifications to Lewisham town centre Area Action Plan (Proposed Submission version)

Relevant policies					
Code	Lewisham AAP	Core Strategy	London Plan and other regional guidance	National policy	Other guidance documents and evidence base
LAAP8	TCA Policy – Central				Lewisham Tall Buildings Study, 2009 Lewisham conservation area appraisals and management plans Lewisham Borough-wide Character Study, 2010 Community services Lewisham Children and Young People's Plan, 2009 Lewisham Social Inclusion Strategy, 2005 Healthy Weight, Healthy Lives (PCT with LB Lewisham), 2009 Lewisham Joint Strategic Needs Assessment, 2009

Area-wide policies

LAAP9	Growing the local economy	Spatial Policy 2 Strategic Site Allocation 6 CS Policies 1, 3, 4, 6, 12, 19 and 20	Policies 2.3, 2.13, 2.15 Parts A, C & D, 4.1, 4.2, 4.3, 4.6, 4.7, 4.8 and 4.9 London-wide Town Centre Health Checks Analysis, 2009	PPS3 Housing, PPS4 Planning for Sustainable Economic Growth NPPF Sections 1 and 2	Lewisham Strategic Housing Market Assessment, 2008 South East London Boroughs' Strategic Housing Market Assessment, 2009 Lewisham Employment Land Study, 2008 Lewisham Retail Needs Study, 2009 Town Centre Health Checks, 2009 Lewisham Infrastructure Delivery Plan, 2010 Lewisham Leisure and Open Space Study, 2009 Ravensbourne River Corridor Improvement Plan, 2009
LAAP10	Mixed use	Spatial Policy 2 Strategic Site Allocation 6 CS Policy 6	Policies 2.3, 2.13, 2.15 Parts A, C & D, 4.1, 4.2, 4.3 and 4.6	PPS4 Planning for Sustainable Economic Growth NPPF Sections 1, 2 and 6	Lewisham Strategic Housing Market Assessment, 2008 Lewisham Employment Land Study, 2008 Lewisham Retail Needs Study, 2009
LAAP11	Employment uses	Spatial Policy 2 Strategic Site Allocation 6 CS Policy 5	Policies 2.3, 2.13, 2.15 Parts A and C, 4.1, 4.2, 4.3 & 4.6	PPS4 Planning for Sustainable Economic Growth NPPF Sections 1 and 2	Lewisham Employment Land Study, 2008
LAAP12	Conversion of existing buildings	CS Policy 1	Policies 2.3, 2.13, 2.15 Parts A and C, 3.3 & 3.14	PPS3 Housing NPPF Sections 1, 2 and 6	Lewisham Strategic Housing Market Assessment, 2008 South East London Boroughs' Strategic Housing Market Assessment, 2009
LAAP13	Student housing	CS Policy 1	Policy 3.8	PPS3 Housing NPPF Sections 2 and 6	
LAAP14	Town centre vitality and viability	Spatial Policy 2 Strategic Site Allocation 6 CS Policies 6 and 15	Policy 2.15 Parts A & C, 4.1, 4.2, 4.3, 4.6, 4.7, 4.8 and 4.9 London-wide Town Centre Health Checks Analysis, 2009	PPS4 Planning for Sustainable Economic Growth NPPF Section 1 and 2	Lewisham Employment Land Study, 2008 Lewisham Retail Needs Study, 2009 Town Centre Health Checks, 2009 Lewisham Borough Wide Character Study, 2010
LAAP15	Lewisham market	CS Policy 6	Policy 2.15 Parts A and C, 4.7 and 4.8		
LAAP16	Retail areas	Spatial Policy 2 Strategic Site Allocation 6 CS Policy 6	Policy 2.15 Parts A, C and D, 4.7, 4.8 and 4.9 London-wide Town Centre Health Checks Analysis, 2009		

Schedule of recommended additional modifications to Lewisham town centre Area Action Plan (Proposed Submission version)

Relevant policies					
Code	Lewisham AAP	Core Strategy	London Plan and other regional guidance	National policy	Other guidance documents and evidence base
LAAP17	Evening economy uses	Spatial Policy 2 Strategic Site Allocation 6	Policy 2.15 Parts A & C Best Practice Guidance: Managing the Night Time Economy, 2007 London-wide Town Centre Health Checks Analysis, 2009		
LAAP18	Public realm	CS Policy 12 Strategic Site Allocation 6	Policies 2.15 Parts A and C and 7.5	PPG17 Planning for Open Space, Sport and Recreation NPPF Sections 2, 7, 8 and 11	Lewisham Leisure and Open Space Study, 2009 Lewisham Borough Wide Character Study, 2010 Ravensbourne River Corridor Improvement Plan, 2009
LAAP19	Tall buildings	CS Policy 18	Policy 7.7	PPS1 Sustainable Development, PPS4 Planning for Sustainable Economic Growth and PPS 5 Planning and the Historic Environment NPPF Sections 2 and 12	Lewisham Tall Buildings Study 2009 Lewisham Conservation Area Appraisals and Management Plans Lewisham Borough Wide Character Study, 2010 By Design, CABE, 2000 Building for Life, CABE Home Builders Federation and Design for Homes Guidance on Tall Buildings, CABE and English Heritage, 2007 Locally Listed Buildings Biggin Hill and London City Airport Safeguarding Maps Areas of Archaeological Priority for Lewisham: English Heritage
LAAP20	Public and shopper parking spaces	CS Policy 14	Policies 2.15 Parts A and C and 6.13	PPS1 Sustainable Development, Supplement to PPS1 Planning and Climate Change, PPS4 Planning for Sustainable Economic Growth and PPG13 Transport NPPF Sections 2 and 4	Lewisham Borough-wide Transport Assessment, 2009 Lewisham Town Centre Transport Study, 2009 Lewisham Local Implementation Plan, 2009
LAAP21	Sustainable transport	CS Policy 14	Policies 2.15 Part D, 6.9 and 6.10	PPS1 Sustainable Development, Supplement to PPS1 Planning and Climate Change and PPG13 Transport NPPF Sections 2 and 4	Lewisham Leisure and Open Space Study, 2009 Ravensbourne River Corridor Improvement Plan, 2009 Lewisham Physical Activity, Sport and Leisure Strategy, 2006 Lewisham Borough-wide Transport Assessment, 2009 Lewisham Town Centre Transport Study, 2009 Lewisham Local Implementation Plan, 2009
LAAP22	Social infrastructure	CS Policies 19 and 20	Policies 2.15 Parts A and C, 3.16, 3.17, 3.18 and 3.19	PPS1 Sustainable Development, PPS4 Planning for Sustainable Economic Growth and PPG17 Planning for Open Space, Sport and Recreation NPPF Sections 2 and 8	Lewisham Infrastructure Delivery Plan, 2010 Lewisham Children and Young People's Plan, 2009 Lewisham Social Inclusion Strategy, 2005 Healthy Weight, Healthy Lives (PCT with LB Lewisham), 2009 Lewisham Joint Strategic Needs Assessment, 2009 Lewisham PCT Commissioning Strategy Plan 2008-2012 Local Education Authority School Plan
LAAP23	Heritage assets	CS Policy 16	Policies 7.8 and 7.9	PPS5 Planning for the Historic Environment NPPF Sections 2 and 12	Lewisham Conservation Area Appraisals and Management Plans Lewisham Borough Wide Character Study, 2010 By Design, CABE, 2000 Locally Listed Buildings Areas of Archaeological Priority for Lewisham: English Heritage

Schedule of recommended additional modifications to Lewisham town centre Area Action Plan (Proposed Submission version)

		Relevant policies			
Code	Lewisham AAP	Core Strategy	London Plan and other regional guidance	National policy	Other guidance documents and evidence base
LAAP24	Carbon dioxide emission reduction	CS Policies 7 and 8	Policies 5.2, 5.3, 5.5 and 5.6	PPS1-Sustainable Development, Supplement to PPS1-Planning and Climate Change, PPS22-Renewable Energy and PPS23-Planning and Pollution Control NPPF Sections 2 and 10	Lewisham Renewables Evidence Base Study, 2009 Lewisham Town Centre AAP Low Carbon and Decentralised Energy Strategy Recommendations, 2010 London Heat Map Study for Lewisham, 2010 Carbon Reduction and Climate Change Strategy, 2008
LAAP25	Adaptation to climate change	CS Policies 7, 8 and 10	Policies 5.3, 5.9, 5.10, 5.11, 5.12, 5.13 and 5.15	PPS1-Sustainable Development, Supplement to PPS1-Planning and Climate Change, PPS22-Renewable Energy and PPS23-Planning and Pollution Control NPPF Sections 2 and 10	Lewisham Renewables Evidence Base Study, 2009 Lewisham Town Centre AAP Low Carbon and Decentralised Energy Strategy Recommendations, 2010 London Heat Map Study for Lewisham, 2010 Carbon Reduction and Climate Change Strategy, 2008
Delivery policies					
LAAP27 LAAP26	Implementation		Policy 8.1	Circular 05/05: Planning Obligations, Planning Act 2008, The Community Infrastructure Levy Regulations 2010, The Community Infrastructure Levy (Amendment) Regulations 2011 and Community Infrastructure Levy: Detailed Proposals and Draft Regulations for Reform – Consultation NPPF Sections 1, 2, 4, 6, 7, 8, 10, 11, 12 and Annex 1	Lewisham Infrastructure Delivery Plan, 2010 Planning Obligations Supplementary Planning Document Lewisham CIL Preliminary Draft Charging Schedule, 2011
LAAP26 LAAP27	Monitoring		Policy 8.4		

Responses to the Lewisham Town Centre AAP¹ Proposed Submission version consultation

(Proposed replacement version following the Inspectors Question number 5)

November 16th 2012

There were 18 respondents to the consultation, comprising 61 individual comments. Officers have examined the representations received and would recommend that 1 main modification and 14 additional 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)
- Indigo Planning for Trademark Homes (LREP10).

Officers consider that only representation LREP8.11 requires a recommended main modification (Ref: MM2) to ensure the plan is sound. No other representation comments received are considered by officers to require modifications necessary to make the AAP sound. However officers have recommended a number of additional modifications as a result of representations which are NOT considered to be a matter of soundness, but are considered to enhance the plan. Officers' recommended full text changes are set out in two schedules that accompany this report, 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 (note that officers do not consider any representation to be a matter of soundness apart from LREP8.11)	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	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	Additional modification	AM25

¹ Note that it is proposed to amend the name of the Lewisham Town Centre AAP to the Lewisham Town Centre Local Plan prior to the adoption of the plan.

					facilities, and community and leisure spaces and <u>policing.</u> "		
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) Note: This respondent requested to attend the oral part of the examination.	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 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.	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 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.	No change	N/A

	LREP3.3	Policies LAAP9, LAAP10, LAAP11		Support	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	No change	N/A
Environment Agency (LREP5)	LREP5.1	Policy LAAP25 and Appendix 4	Sound	Support	Noted, no changes are recommended	No change	N/A
Geoffrey Thurley (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.	Officers do not agree that the Lewisham Town Centre AAP is unsound as a result of any of the comments in LREP6. 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	No change	N/A

					1,400sqm) is considered appropriate for the location without having a detrimental affect on existing nearby retail.		
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 AAP does not need to repeat this approach.	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?	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. 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.	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	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.	sets out the context for Policy LAAP2. Recommended for inclusion. Adjust paragraph 4.4 to read: "The Lewisham Gateway TCA will seek to deliver the following:"	Additional modification	AM7
	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. New retail provision should complement and not compete with the existing Primary Shopping Frontage. Key route and public realm improvements".	Additional modification	AM8
	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.	Additional modification	AM9
	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	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	No change	N/A

	LREP8.9	Policy S3a and S3b	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.	as 'edge of centre' and on development of the Lewisham Gateway scheme will become 'town centre'.	No change	N/A
	LREP8.10	Policy S5	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 Gateway scheme will become 'town centre'. These sites are therefore considered as appropriate for comparison retail.	Additional modification	AM11
	LREP8.11	Section 4.3	Define what 'commercial' means in the policy.	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	MM2
			The NPPF defines this area as out of centre (over 300m from the Primary Shopping Area).	Recommended for inclusion (Officers consider that the following change is required in order to make the plan sound). Adjust 4.14 to read: ".....This edge of centre out of centre 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'.		

	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".	Additional modification	AM13
	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.	Additional modification	AM14
	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	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

				circuit and pedestrian footfall”.			
	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 of individual sites.	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		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 <u>sense of arrival and should enhance and support the southern end of the high street</u> 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	No change	N/A

					Shopping Area or Primary Shopping Frontage.		
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 Lewisham Gateway (and approved planning permissions) ”	Officers do not agree that the Lewisham Town Centre AAP is unsound as a result of any of the comments made in LREP10. 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	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	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	No change	N/A

	LREP10.4	Policy S5	Unsound Not effective	feasible” The site should not be commercially lead, but should be for mixed use as long as suitable re-provision of employment uses is made.	decentralised energy. 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 LAAP22).	No changes are recommended. Paragraph 4.13 and LAAP22 are based on the current Section 106 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.	No change	N/A
	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	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.	equally plausible that the purpose built student accommodation will be used by students coming in from outside of the borough. Recommended for inclusion. Adjust Policy 13.2.b to read: "include a range of unit sizes and layouts, including with and without shared facilities, <u>as appropriate</u> ".	Additional modification	AM18
	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 the review of this document. It is not considered necessary to make any additions to the AAP.	No change	N/A
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)					Officers do not agree that the Lewisham Town Centre AAP is unsound as a result of the comments made in 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.	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 achieve it.	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		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> ".	Additional modification	AM23
	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> ".	Additional modification	AM24
	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> ".	Additional modification	AM10
	LREP15.5	Figures 3.6 and 4.2		Can the improved station access be achieved through the bus stand	Comment noted. No changes are recommended. This is an integral part	No change	N/A

	LREP15.6	LAAP20		site? Amend the electric charging points standards to match the London Plan.	of the Lewisham Gateway development discussions of which TfL have been involved. 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. are required to comply with the London Plan regarding the provision of electric charging points. Further, all accessible points must meet the Source London criteria so that they can become part of the London-wide network.	Additional modification	AM21
	LREP15.7	LAAP20		The AAP should contain parking standards to reflect the London Plan.	No changes are recommended. The Core Strategy acknowledges that the borough will use the London Plan parking standards, therefore it does not need to be repeated in the AAP.	No change	N/A
	LREP15.8	Para 5.70		It should be explained that the parking strategy is reliant on the progression of sites in Conington Road and Thurston Road.	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”.	Additional modification	AM22
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					Officers do not agree that the		

(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.	<p>Lewisham Town Centre AAP is unsound.</p> <p>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>.</p> <p>Also add the following text as a new paragraph 6.16:</p> <p><u>“Water Supply and Sewerage Infrastructure</u></p> <p><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 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></p>	Additional modification	AM26
Theatres Trust (LREP18)	LREP18.1	Policies LAAP17 and	Not stated	Support for policies LAAP17 and LAAP22.	Noted, no changes are recommended	No change	N/A

	LREP18.2	LAAP22 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
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