

**Planning Policy** 

Tel: 020 752 5471

Fax: 020 7525 5561

planningpolicy@southwark.gov.uk

Brian Regan
Planning Policy Manager
Planning Policy Group
London Borough of Lewisham
Town Hall
Catford
London
SE6 4RU

06 April 2010

Dear Brian,

#### CONSULTATION OF DRAFT CORE STRATEGY

Thank you for consulting LB Southwark on Lewisham's draft Core Strategy.

To provide some context, we have submitted our own core strategy and the Canada Water area action plan to the secretary of state in March 2010 for formal examination. Our comments on Lewisham's core strategy are mainly made in reference to these two documents. In the course of preparing the AAP and core strategies, we have met regularly with officers from Lewisham to share plans and consider the implications, particularly with regard to infrastructure. We look forward to maintaining this relationship with Lewisham, as the plans move forward to adoption and implementation.

# **Spatial policy 2**

Southwark welcomes the proposals to regenerate the Deptford, Deptford Creekside and New Cross/New Cross Gate areas. In conjunction with Southwark's proposals in Rotherhithe, redevelopment of these sites offers the potential to transform this area of London over the next 15 years or so.

The area has potential to make a significant contribution to both Lewisham and Southwark's housing targets as well as providing town centre uses, employment and other facilities. Over the plan period, some 14,000 new homes are expected to be built (3,400 in Rotherhithe and 10,600 in Deptford New Cross), around 35,000sqm of new shopping and leisure floorspace is planned at Canada Water and a significant amount of employment space is proposed on Lewisham sites. There is a need for new infrastructure to support this level of growth. We have identified a requirement for a new secondary school, as well as primary school places and through the

Canada Water AAP have allocated a site close to the borough boundary on Rotherhithe New Road.

Lewisham and Southwark's strategic sites are located on either side of the A2 (Lower Road-Evelyn Street). To inform the Canada Water AAP and to respond to London Plan Policy 5D.3 and paragraph 5.1.22, we have prepared a multi-modal traffic model to assess the impact of development in the area on transport infrastructure and to inform a transport strategy which enables the impact of growth to be managed. The modal comprises two elements: a local multi-modal model which replicates current patterns of transport in Rotherhithe and north Lewisham and a strategic model which extends as far as Tower Bridge and the Blackwall Tunnel and which can be used to demonstrate the impacts of wider area developments and strategic traffic management measures. The model has been validated by Transport for London.

We used the model to test a number of scenarios and the main findings were: the A2 is currently very congested during peak periods and there is little scope to provide additional capacity for a predicted increased demand in highway travel; by 2014, the situation is expected to worsen and by 2024, if all planned developments in Rotherhithe and Lewisham are implemented, without improvements to infrastructure, the network will be over capacity.

To accommodate growth generated by developments at Canada Water, through the AAP we are proposing to make a number of improvements to the highway network, the most important of which comprises the reintroduction of two-way traffic movements on Lower Road. The principal benefits will be improved conditions for pedestrians and cyclists, including more direct and safer crossing points, an improved environment for shoppers on Lower Road and a traffic management scheme that enables more effective management of vehicle flows through the area. We have estimated that our proposed package of measures will costs about £9m, which will in the main be recovered through s106 planning obligations.

Paragraph 5.11 of the London Plan states that road congestion is a particular issue on the A2 and A200 and that a framework for Deptford Creek and Greenwich Riverside should address this. In the light of both the London Plan policy and our own findings developed through the multi-modal model, we consider that a further point should be added to the guidance for the Deptford, Deptford Creekside and New Cross/New Cross Gate areas to the effect that development in the area will:

Help address the cumulative impact of development on the A2 by enabling more effective management of traffic and improving the environment for all users, including pedestrians, cyclists and public transport users.

With regard to the other points in the policy, in view of our commitment to regenerating Canada Water town centre we welcome the emphasis in point D on providing smaller-scale local retail uses on-site where larger scale redevelopment occurs. Such uses should not impact on the vitality of viability of existing centres.

We are also supportive of point J and the recognition of the potential to use development opportunities to improve connectivity throughout the area for pedestrians and cyclists and provide new accessible public spaces and contribute to improving the relationship with the River Thames

#### Strategic site allocation 1

Southwark welcomes the requirement to prepare masterplans for each of the strategic sites. We are in broad agreement with the bullets in part 3 (b) of the policy and would strongly support the provision of infrastructure plans, as stated in 3 (c).

# Strategic site allocation 3

We welcome proposals to regenerate the Surrey Canal Triangle and would support enhancements to Bridge House Meadows (1h) and improved links with Southwark (1i and 2e). Southwark has been working with Lewisham and Sustrans to deliver the Connect 2 pedestrian and cycle route and therefore is particularly supportive on the references to links to Surrey Quays and South Bermondsey Station in 2 (e,ii and iii).

In view of the fact that Southwark's draft core Strategy proposes the retention of the preferred industrial location designation around Old Kent Road and Ilderton Roads, we also welcome the commitment in 1(j) to ensuring that the design of new development enables the continued functioning of the adjoining Surrey Canal Road Strategic Industrial Location.

# Strategic site allocation 4

We welcome the proposals to create new open spaces on the site of the alignment of the former Surrey Canal.

### Strategic site allocation 5

We welcome proposals to regenerate sites on Plough Way. In view of our commitment to regenerating Canada Water town centre and strengthen its role in London's retail hierarchy, we support the statement in 1 (d) that retail uses should serve local needs that do not adversely impact on existing town centres.

As we noted above, we are supportive of proposals to create new open spaces on the site on the alignment of the former Surrey Canal and recognition of the need to improve access to Greenland Dock. In the Canada Water AAP we are proposing to make improvements to the linkage between Greenland Dock and the former Surrey Canal, through appropriate signage etc.

It should be noted that through the Southwark core strategy, we have designated the area to the north of Plough Way as a suburban density zone. We welcome point 2 (d) that the scale, mass and orientation of buildings should take into account the surrounding built context to create a coherent area and consider that character of the area surrounding the site, including the suburban densities to the north, could be further described in the reasoned justification.

I attach a copy of the Development Impact Report which incorporates the findings the Rotherhithe multi-modal traffic model.

Please do not hesitate to contact me should you have any queries.

**Planning Policy -** Regeneration and Neighbourhoods, 160 Tooley Street, London, SE1P 5EX **Switchboard -** 020 7525 5000 **Website -** www.southwark.gov.uk **Interim Director –** Richard Rawes

Yours sincerely

Whiet Seymour

Juliet Seymour Head of Planning Policy