



Further analysis on the areas covered by the Lewisham Article 4 Direction - Commercial, business and service use (Use Class E) to residential use (Use Class C3).

Additional Evidence Paper

September 2023

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1. Introduction

- 1.1. The purpose of this report is to provide a more detailed analysis of the areas covered by the Article 4 Direction removing Class MA permitted development rights in the London Borough of Lewisham. A representation period on the previously proposed Article 4 Direction ran from Friday 30 September 2022 until Monday 5 December 2022.
- 1.2. However, following formal notification to the Secretary of State, The Department for Levelling Up, Housing and Communities (DLUHC) considered that the proposed Article 4 Direction did not comply with national policy. They requested the Council to reconsider the coverage of the Article 4 Direction and prepare additional evidence base work. This demonstrating that the boundaries are limited to situations where it is necessary to avoid wholly unacceptable adverse impacts and applies to the smallest geographical area possible.
- 1.3. This report has been prepared in response to feedback from DLUHC and makes recommendations on revisions to the boundaries of the areas covered by the Article 4 Direction as originally proposed in September 2022. This report includes more detailed granular assessments focused on individual streets and buildings where wholly unacceptable adverse impacts would occur due to the permitted development right.
- 1.4. The completed proforma showing statistics on the size of the areas covered by the proposed Article 4 Direction in 2022 and following proposed modifications to the boundaries are included in Section 8 of this report.

2. Methodology

Town Centres

- 2.1. The proposed extent of the revised Article 4 Direction coverage has been based on desk-based analysis at a street and building level. A qualitative and quantitative judgement has been made separately for each Major, District or Local Centre to determine which buildings should be covered by an Article 4 Direction, with several factors taken into consideration. This process is outlined below.

Step 1: Identifying broad locations to be considered for coverage by an Article 4 Direction:

- The starting point for identifying locations to be considered for coverage by an Article 4 Direction was the Borough's designated town centres (major, district and local) as shown in the Regulation 19 Policies Map.

Step 2: Identifying larger areas to be excluded from the Article 4 Direction area:

- The exclusion of open spaces, residential areas and roads.
- The exclusion of buildings in Class E use which are over 1500sqm; these do not currently have permitted development rights under Class MA.

Step 3: Identifying buildings to be included within the Article 4 Direction

- Assessing whether there is a clear and obvious 'core area', particularly within the primary shopping area, with higher concentrations of shops and services which should be protected.
- Ensuring that essential services, such as pharmacies etc. are protected.
- Considering whether there are clusters of shops, particularly outside the primary shopping area, that meet the needs of Lewisham's diverse community, such as international food shops etc, that need to be protected.
- Considering whether there are clusters of shops outside the primary shopping area that contribute to placemaking, such as those located opposite a train station or river corridor, that need to be protected.

Step 4: Identifying buildings to be excluded from the Article 4 Direction area.

- The exclusion of non-Class E uses, particularly located outside the Primary Shopping Area, towards the edge of the Primary Shopping Area or within clusters.
- Assessing the proportion and location of vacant units and considering whether stretches of vacant units should be excluded.

- Assessing whether clusters of uses that do not positively contribute to the centre's retail function, such as takeaways, betting shops and estate agents should be excluded.
 - Assessing whether there are peripheral locations outside the primary shopping area in decline with a poor-quality physical environment with vacancies, or non-continuous active frontages that should be excluded.
 - Assessing whether Class E buildings separated from the town centre by clear physical and visual boundaries, such as road junctions, should be excluded.
 - The exclusion of typologies, such as retail warehouse units and railway arches, which do not lend themselves to residential conversion.
- 2.2. An assessment table for each town centre has been included, which sets out the justification at a granular level for including and excluding frontages from the Article 4 Direction with the above factors taken into consideration. This is then supported by a broader higher-level assessment for each town centre on the wholly unacceptable adverse impact without an Article 4 Direction.
- 2.3. For non-designated neighbourhood parades, only those which were 400 meters (5 minutes walking distance) from a Major, District or Local Centre and did not mainly consist of takeaways, betting shops or vacant units were included.

Mixed Use Employment Locations (MEL)

- 2.4. Following a request from the DLUCH, the Council extracted ground floor use masterplans from the relevant planning applications to demonstrate the provision for Class E use has been maximised within the MEL. Furthermore, these plans have also been used to inform a boundary of the revised Article 4 Direction. For instance, any apparent areas of open space or clusters of solely residential buildings have been excluded from the revised Article 4 Direction boundary.

Locally Significant Industrial Sites (LSIS) and Strategical Industrial Locations (SIL)

- 2.5. For LSIS and SIL the assessment has included a desktop review to identify Class E uses to be retained within the revised boundaries in office, light industrial or other Class E uses. They have also been assessed as to whether they contain elements necessary for habitation, including windows to allow natural daylight inside.

3. Town centres

Major Centres

- 3.1. The proposed revised Article 4 Direction boundaries for the Borough’s major centres, including Catford and Lewisham, are set in the maps below alongside the supporting justification.

Catford Major Centre

Figure 1: Map showing proposed revised Article 4 Direction area for Catford Major Centre.

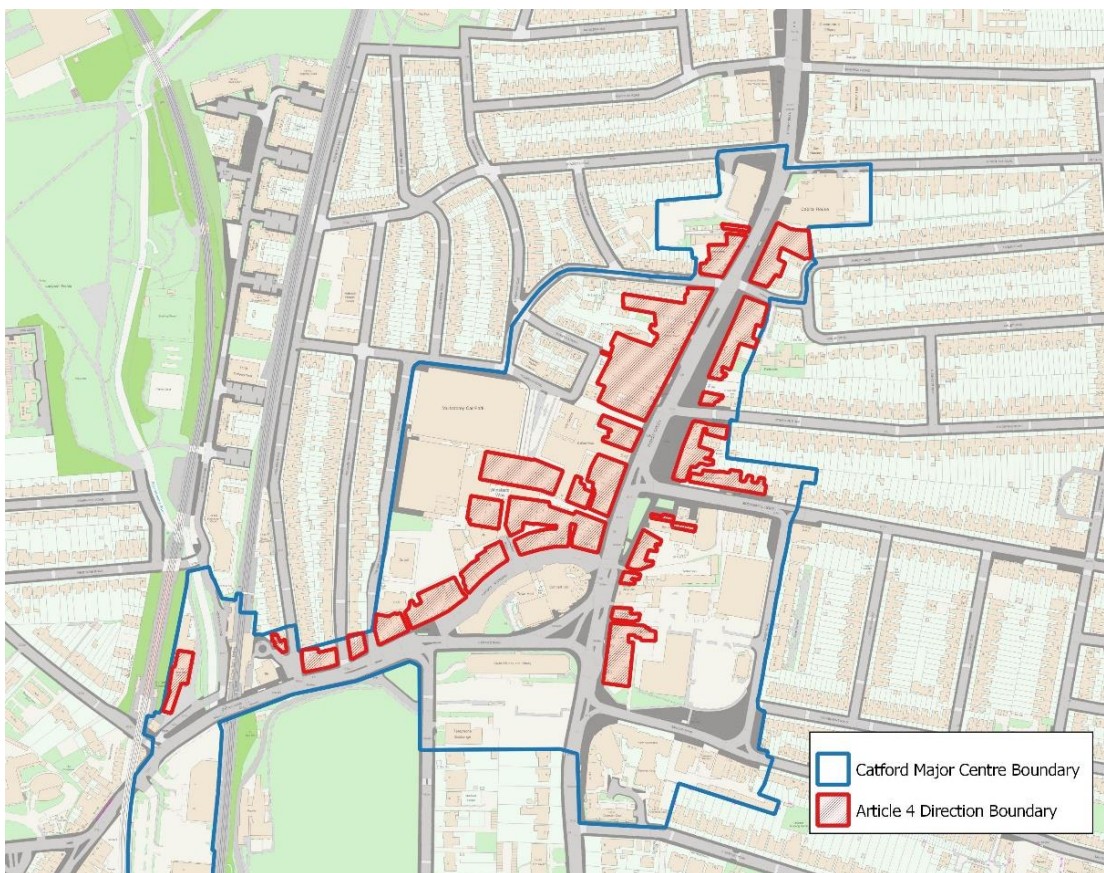


Table 1: Justification for the including or excluding frontages across Catford Major Centre within the revised Article 4 Direction area proposed.

Frontage	Justification
	Include
Station Buildings, Catford Road: 1 to 9	Part of the primary shopping area with no vacant units.
Catford Broadway: 1 to 35	

<p>Winslade Way: 1 to 13, 22 to 31 and 33 to 36</p> <p>Rushey Green: 164 to 136 and 128 to 54, 199 to 147, 133 to 117, 107 to 75 and 43 to 47</p>	<p>Part of the primary shopping area with a low level of vacancy.</p>
<p>Doggett Road: Units 1 to 3a</p>	<p>Although it is part of the periphery of the town centre, these units are located opposite a square fronting Catford Bridge Station and therefore contributes to place-making. Furthermore, no units are vacant or in sui-generis use class.</p>
<p>Adenmore Road: 1 to 2 and Grovesnor Court</p>	<p>Although it is part of the periphery of the town centre, they are located opposite high quality public realm along the River Ravensbourne and therefore contributes to place-making. Furthermore, no units are vacant or in sui-generis use class.</p>
<p>Brownhill Road: 1 to 15</p>	<p>Although a peripheral town centre location, the units along this frontage are independent businesses providing goods and services that meet the needs of the Borough's diverse communities such as an international food shop and Afro-Caribbean hairdressers. Furthermore, only 25% units are either vacant or in sui generis use class.</p>
<p>Ringstead Road: 1 to 4</p>	<p>Although it is part periphery of the town centre, the units along this frontage are independent businesses provide goods and services that meet the needs of the Borough's diverse communities such as Afro-Caribbean hairdressers and Caribbean supermarket. Furthermore, no units are vacant or in sui generis use class.</p>
<p>Ground floor units at Eros House</p>	<p>Although periphery town centre location, all units are fully occupied in use Class E providing valuable food and drink offer to the town centre.</p>
Exclude	
<p>1 to 7 Catford Hill, Catford Island Retail Park Plassy Road and Aldi at Bradgate Road</p>	<p>Edge of centre location and typology is comprised of retail warehouse units which does not lend itself to residential conversion.</p>
<p>Catford Bridge Tavern, Former Catford Constitutional Club and Brookdale Club</p>	<p>Two detached Public Houses and one detached proposed live music venue whereby the permitted development would not apply.</p>

Tesco and Catford Mews at Winslade Way	Permitted development does not apply as both are units above 1,500sqm
Laurence House, Civic Centre and Catford Broadway Theatre	Within Council ownership meaning conversion to residential is unlikely.
Rushey Green Telephone Exchange	Sui generis use class meaning permitted development does not apply.
Rushey Green: 43 to 49	Edge of centre location with only one active Class E unit.
Brownhill Road: 2 to 12	A peripheral town centre location which is underperforming given that 50% of units are either sui-generis, vacant or residential.
Bromley Road: 1 to 13	A peripheral town centre location with only one active class E use unit.
Sangley Road: 22 to 44	An edge of centre location with a high proportion of units (44%) which are either vacant or sui generis use.

Assessment of wholly unacceptable adverse impacts

- 3.2. The revised Article 4 Direction covers 14% of Catford Major Centre, which demonstrates a blanket approach has not been taken.
- 3.3. The Article 4 Direction area targets the commercial core of the town centre at frontages predominantly within the primary shopping area along Rushey Green and Catford Broadway, where lies a critical cluster of Class E units. Without an Article 4 Direction, the piecemeal introduction of ground floor residential uses into the commercial core could eliminate the critical mass of retailing and other main town uses which attract people into the town centre. Therefore, less footfall would undermine a new Local Plan's spatial strategy that seeks to reinforce Catford town centre's - Lewisham's second-largest centre - role as the Borough's principal civic and cultural hub.
- 3.4. Some well-performing frontages in peripheral locations outside the primary shopping area have also been included within the Article 4 Direction. Firstly, along Dogget Road and Adenmore Road. Without an Article 4 Direction here, the loss of ground floor active frontages due to residential conversion at key entrance points into the town centre supported by generous public realm would harm the sense of arrival. And secondly, along Brown Hill Road and Ringstead Road, where there is a strong presence of Afro-Caribbean hairdressers and independent supermarkets. The loss of these Class E uses through permitted development would harm Catford Major centre's ability to meet the needs of a diverse community.

Lewisham Major Centre

Figure 2: Map showing proposed revised Article 4 Direction area for Lewisham Major Centre (central northern focus)

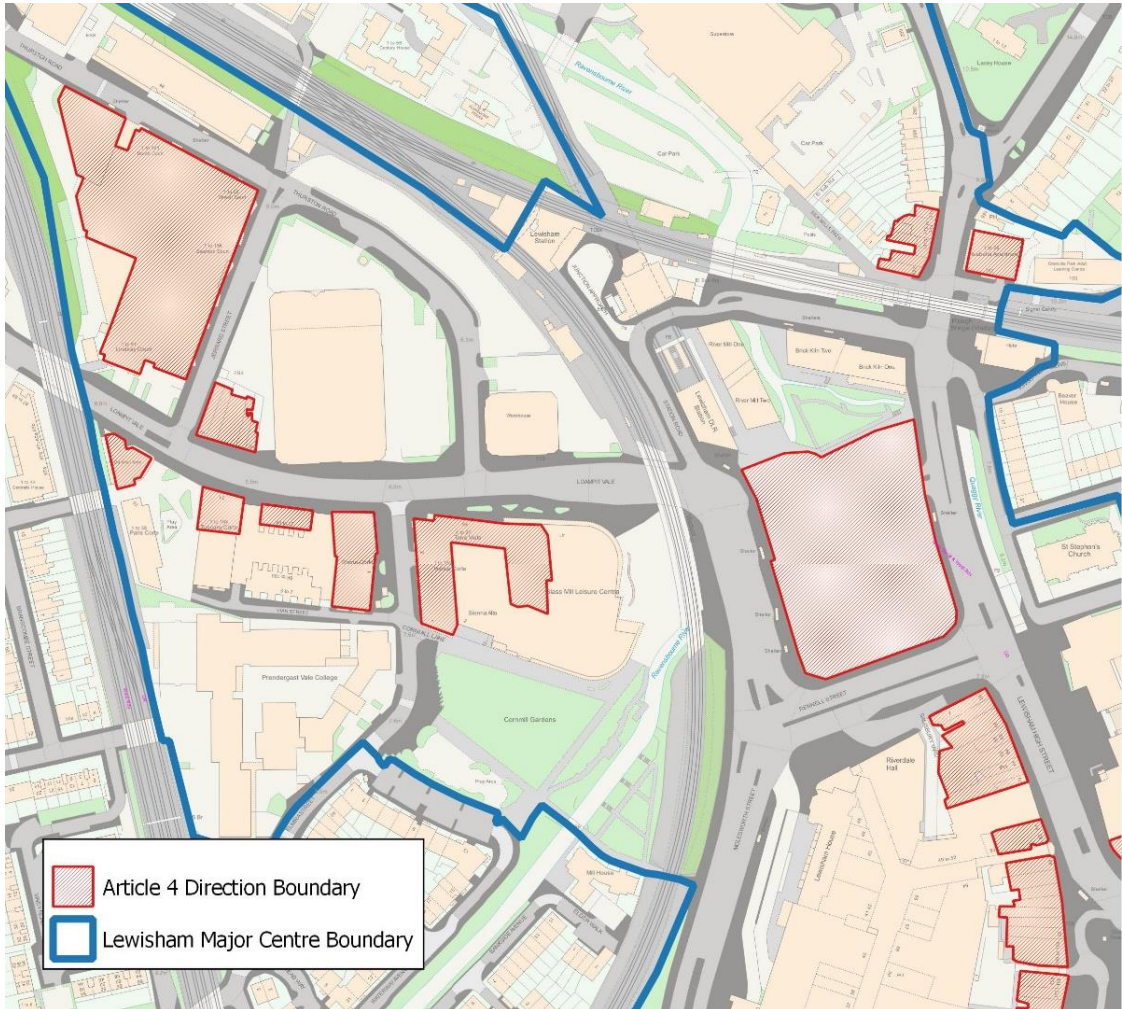


Figure 3: Map showing proposed revised Article 4 Direction area for Lewisham Major Centre (southern and central focus)

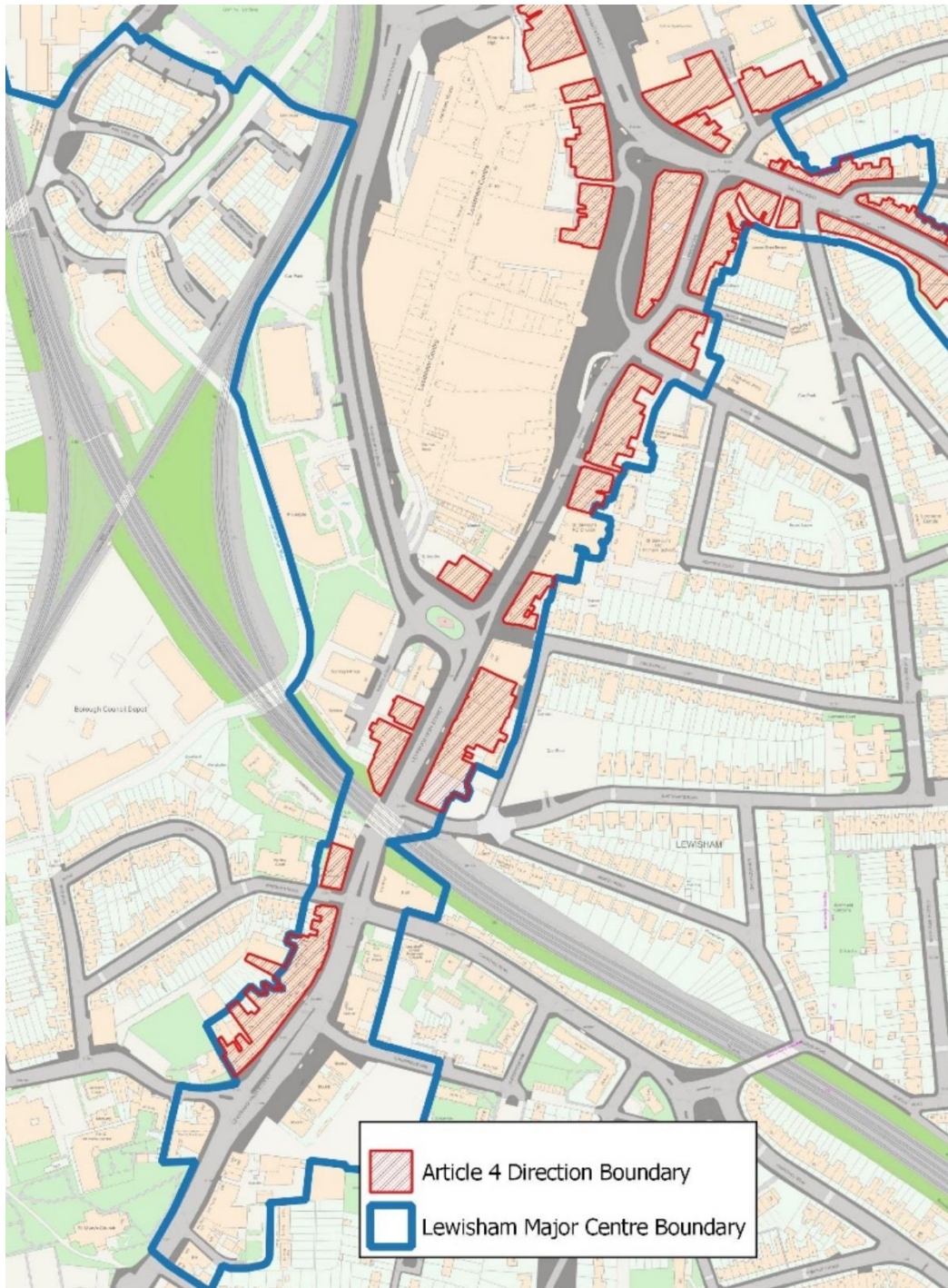


Figure 4: Map showing proposed modified Article 4 Direction area for Lewisham Major Centre (eastern focus)

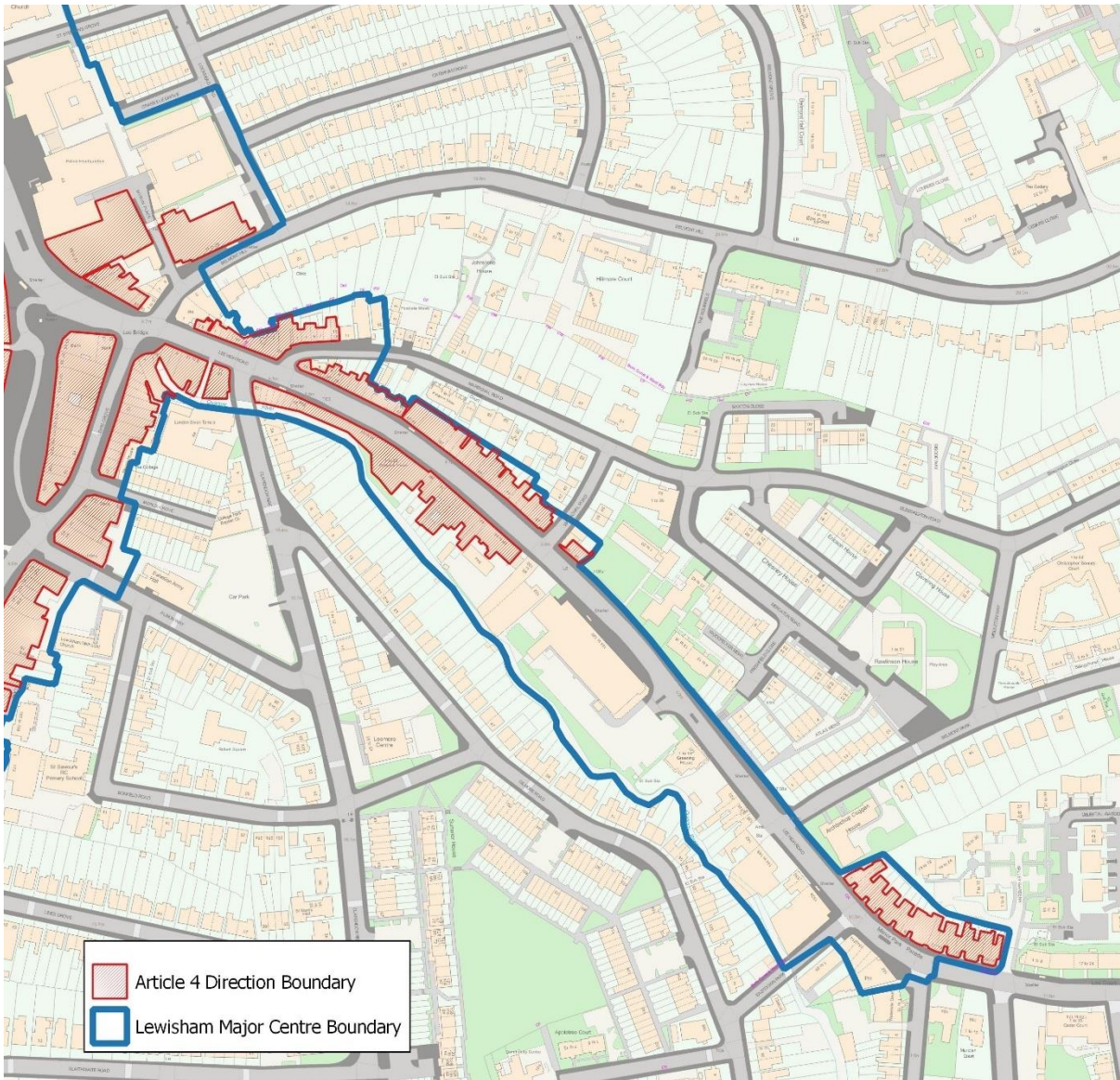


Table 2: Justification for including or excluding frontages across Lewisham Major Centre within the revised Article 4 Direction area proposed.

Frontage	Justification
Include	
Lewis Grove: All ground floor units	Forms part of the primary shopping area with a low level of vacancy.
Lewisham High Street: 212 to 208, 120 to 50	
Lewisham High Street: 236 to 328 and 203 to 227	Although just outside the primary shopping area it is performing strongly with only 25% of units that are vacant or takeaways. Furthermore, along this

	frontage includes many independent businesses providing goods and services that meet the needs of the Borough's diverse communities, such as an international food shop, an Islamic clothing store, an oriental supermarket, and Afro-Caribbean hairdressers.
Lewisham Gateway Phase 2	Forms part of primary shopping area and upon completion this year will provide 25,000 square feet of retail space, 15,000 square feet of food and beverage space, 10,000 square feet of offices, a gym, and a multiplex cinema.
Lee High Road: 2 to 86 and 3 to 91	<p>Although outside the primary shopping area, it is performing well with 17% of units either vacant or in takeaways and these are scattered within the frontage.</p> <p>Furthermore, independent businesses have a strong presence that provides goods and services that meet the needs of the Borough's diverse communities, such as Afro-Caribbean hairdressers and Eastern European and South American supermarkets.</p>
Manor Park Parade: 1 to 19	Strong performing cluster of 15 units - mainly class E use - outside the primary shopping area. There is only vacant one unit and two takeaways and these are scattered within the frontage.
Lewisham High Street: 65 to 83	Although just outside the primary shopping area, it is performing strongly with no vacant units and only one takeaway unit.
Lewisham Road: 322 to 310, 120 to 150 and 102	Although outside the primary shopping area, it is performing strongly with no vacant or takeaway units.
Marischal Road: 1 to 15	Although outside the primary shopping area, it is performing strongly with no vacant or takeaway units.
Loampit Vale: 66 to 76 and 46 to 71	Although just outside the primary shopping area, it is performing strongly with no vacant units and only one takeaway unit.
Thurston Road: Unit 8 and Thurston Point Ground Floor units Loampit Vale: Lindsey Court, 47 Elmira Street: 1 to 10	Whilst outside the primary shopping area, it is performing strongly with no vacant or takeaway units.

Land at Engate Street: 30 and 34 Renaissance: Units A to C	Whilst outside the primary shopping area, it is performing strongly with no vacant units.
Belmont Hill: 11 to 29	Whilst outside the primary shopping area, the provision of a bowling alley is important to evening and entertainment offer of the town centre.
Exclude	
Lewisham Shopping Centre	Unlikely to be converted to residential use due to being an indoor shopping centre as well as being at pre-application stage for comprehensive mixed-use development.
Lewisham High Street: 322 to 340, 293 to 323	Edge of centre location which feels separated from the remainder of town centre owing to the road junction between Ladywell and Lewisham High Street.
Belmont Hill: 1 to 9	Edge of centre location which is underperforming as there is only one active class E unit, and the remaining are takeaways.
Lee High Road: 144 to 148	MOT Centre in sui-generis use and therefore the permitted development does not apply.
Lee High Road: 104 to 20 Loampit Vale: Lewisham Retail Park and 290	Permitted development does not apply as the unit is above 1500sqm threshold.
Lee High Road: 122 to 124	Hairdressers which are perceived as being disconnected from the remainder of the high street owing to being sandwiched in between car parks.
Lee High Road: 1 and 6 Manor Park Lewisham Road: 165	Semi-detached public houses in sui-generis use and therefore the permitted development does not apply.
Lee High Road: 138 to 132	Cluster of sui generis uses (takeaways, dry cleaner and a car show room) and therefore the permitted development does not apply.
Lewisham High Street: 1 to 13	Hotel in C1 use class therefore the permitted development does not apply.
Lewisham High Street: 199 to 201	Public library in use class F and therefore the permitted development does not apply.
Engate Street: 32	Sorting office in sui-generis use and therefore the permitted development does not apply.

Assessment of wholly unacceptable adverse impacts

- 3.5. The proposed revised Article 4 Direction covers 13% of Lewisham Major Centre, which demonstrates a blanket approach has not been taken.
- 3.6. The Article 4 Direction area targets the commercial core of the town centre. This is comprised of frontages predominantly within the primary shopping area along Lewisham High Street and Lewis Grove. It also includes the following which are outside the primary shopping area along Lee High Road, Lewisham Road, Loampit Vale, Thurston Road and Manor Park Parade. The latter comprised of a critical cluster of Class E units. Without an Article 4 Direction, the piecemeal introduction of ground floor residential uses into the commercial core could eliminate the critical mass of retailing and other main town uses which attract people into the town centre. Therefore, less footfall would undermine a new spatial strategy for the borough that seeks to enable Lewisham Major Centre to cement its position as a centre of sub-regional significance and be designated as a Metropolitan Centre in a future review of the London Plan.

District Centres

- 3.7. The proposed revised Article 4 Direction boundaries for the Borough's seven district centres are set in the maps below alongside the supporting justification.

Forest Hill District Centre

Figure 5: Map showing proposed revised Article 4 Direction area for Forest Hill District Centre.

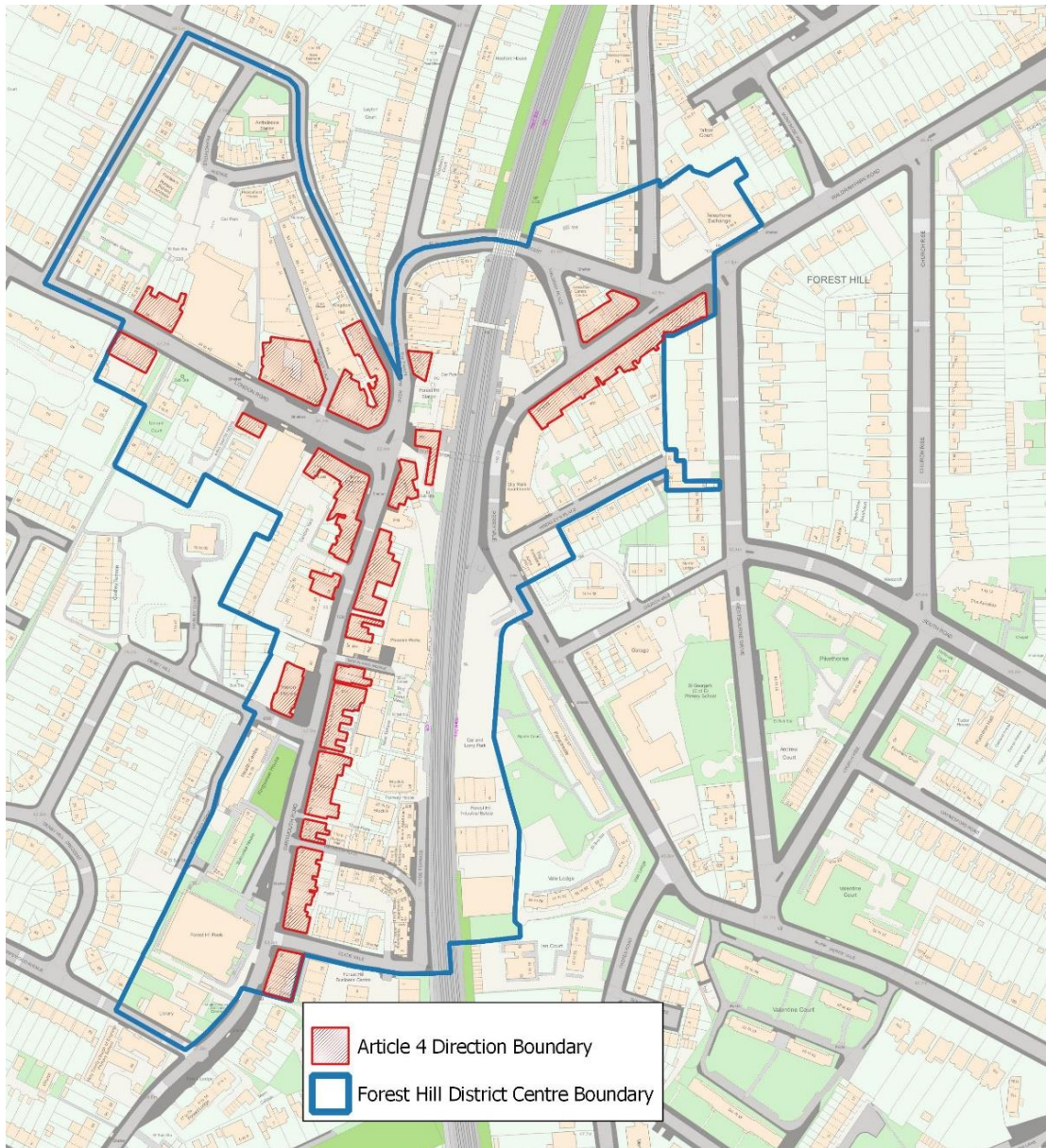


Table 3: Justification for including or excluding frontages across Forest Hill District Centre within the revised Article 4 Direction area proposed.

Frontage	Justification
Include	
London Road: 1 to 9, 2 to 28 and 50 to 58 45 to 53, 23 to 29 The Façade, Devonshire Road: 7 to 13 David's Road: 1 to 5	Forms part of the shopping area with no vacant units.
Dartmouth Road: 2 to 12, 16 to 18, 1 to 7 and 9 to 35 Devonshire Road: 1 to 7	Forms part of primary shopping area with a low level of vacancy.
Dartmouth Road: 39 to 105	Although outside the primary shopping area, it is performing moderately well with a third of units either vacant or in sui-generis use and these are scattered within the frontage.
Westbourne Drive: 1 to 4 Perry Vale: 1 to 29 Perry Vale 2 to 14	Although a peripheral town centre location, it is performing moderately well with a third of units either vacant or in sui-generis use and these are scattered within the frontage.
Dartmouth Road: 32 to 34	Office building located just outside the primary shopping area which supports the retail function of the centre.
Exclude	
Dartmouth Road: Forest Hill Pools, Forest Hill Library and Louise House Laundry	All fall within Use Class F so permitted development does not apply.
Dartmouth Road: 20 to 28	Two units (one betting shop and one bar) in sui generis use class at edge of the primary shopping area.
Dartmouth Road: 14 and 30	Residential units outside the primary shopping area
Sainsbury's: 34 to 38	Permitted development does not apply the unit since it is above 1,500sqm
London Road: 11 to 21 Perry Vale: 53	Both are detached public houses in sui generis use class where permitted development does not apply.
Perry Vale: 29 to 31	Outside the primary shopping area and separated from cluster of active frontages along Perry Vale.

Perry Vale 26:	Isolated taxi business at the edge of centre in sui-generis use class whereby the permitted development does not apply.
Stanstead Road: 1 to 17	Edge of centre location where high proportion of units (77%) are residential or vacant.
Dartmouth Road: 35 and 28 to 20	Sui-generis units at the edge of the primary shopping area consisting of one bar, one public house and a betting shop.

Assessment of wholly unacceptable adverse impacts

- 3.8. The proposed Article 4 Direction covers 9% of Forest Hill District Centre, which demonstrates a blanket approach has not been taken.
- 3.9. The Article 4 Direction area targets the commercial core of the town centre at frontages predominantly along London Road and Dartmouth Road which are particularly susceptible to the piecemeal introduction of ground floor residential use. Permitted development would undermine the continued evolution of Forest Hill District Centre into a thriving commercial and cultural hub, an important aspect of the new spatial strategy for the Borough. This is because, without the Article 4 Direction, Forest Hill District Centre would lose its ability to adapt to future circumstances, as the flexibility offered to commercial units to move to a variety of uses within Class E is lost.
- 3.10. Although the train line separates Perry Vale from the core of the town centre, it consists of around 34 shops and, therefore, it provides significant provision to the eastern area of Forest Hill. Without an Article 4 Direction, the conversion of ground floor active frontages into residential units would undermine the ability of the centre to serve residents and communities residing to the east of Forest Hill.

Sydenham District Centre

Figure 6: Map showing proposed revised Article 4 Direction area for Sydenham District Centre.



Table 4: Justification for including or excluding of frontages across Sydenham District Centre within the revised Article 4 Direction area proposed.

Frontage	Justification
Include	
Sydenham Station Approach: 1 to 10 Kirkdale: 313 to 315 Sydenham Road: 260 to 278	Forms part of the primary shopping area with no vacant units.
Sydenham Road: 321 to 328 and 3 to 111, 4 to 12, 15 to 28a and 36 to 78a. Kirkdale: 256 to 242	Forms part of primary shopping area with a low level of vacancy. Although outside the primary shopping area, it is performing moderately well with a third of units that are vacant, and these are scattered within the frontage.
Kirkdale: 291 to 307 Sydenham Road: 163 to 169	Although outside the primary shopping area, it is performing well with no vacant units or takeaways.
Sydenham Road: 80 to 96a, 106 to 114 and 118	Although outside the primary shopping area it is performing moderately well with 16% of units that are vacant, and these are scattered within the frontage.
Sydenham Road: 140 to 158 and 162 to 176	Although outside the primary shopping area it is performing well with 20% of units that are vacant. Furthermore, there is a strong presence of businesses that provide goods and services that meet the needs of the Borough's diverse communities such as

	Afro-Caribbean hairdressers and Caribbean restaurants.
Exclude	
Sydenham Road: 98 to 104	Cluster of four vacant units outside the primary shopping area.
Sydenham Road: 129 to 137	Underperforming section outside the primary shopping area where 66% of units are vacant or in sui-generis use class.
Sydenham Road: 277	Petrol station at the edge of centre in sui-generis use class where the permitted development does not apply.
Sydenham Road: 313 to 315, 325, 121, 116 and 178	Detached or semi-detached public house in sui-generis use class where the permitted development does not apply.
Sydenham Road: 2	Residential unit at the edge of a row of shops.
Sydenham Road: 30 to 32	Two residential units and a vacant unit at edge of the primary shopping area.
Sydenham Road: All Saints Court to 138	Largely residential section outside the primary shopping area.
Mayow Road: 140 to 149 Sydenham Road: 139 to 151	Car dealership outside the primary shopping area in sui-generis use where the permitted development does not apply.
Sydenham Road: 153 to 161	Hand car wash centre outside the primary shopping area in sui-generis use where the permitted development does not apply.
Sydenham Road: 193	Detached MOT centre outside the primary shopping area in sui-generis use where the permitted development does not apply.
Sydenham Road: 201	Dental practice outside the primary shopping area which feels separated from remainder of the centre owing to being sandwiched between two residential blocks.
Sydenham Road: 180 to 190	Small supermarket at the edge of centre which feels separated from the remainder of centre owing to residential block opposite and eastwards.

Assessment of wholly unacceptable adverse impacts

3.11. The proposed Article 4 Direction covers 18% of Sydenham District Centre, which demonstrates a blanket approach has not been taken.

3.12. The Article 4 Direction area targets the commercial core of the town centre at frontages along Sydenham Road and Kirkdale Road. The latter comprised of a critical cluster of Class E units. Without an Article 4 Direction, the piecemeal introduction of ground floor residential uses into the commercial core could eliminate the critical mass of retailing and other main town uses which attract people into the town centre and therefore undermine the Centre's role as the largest town centre in the Borough's West Sub-area.

Downham District Centre

Figure 7: Map showing proposed revised Article 4 Direction area for Downham District Centre.

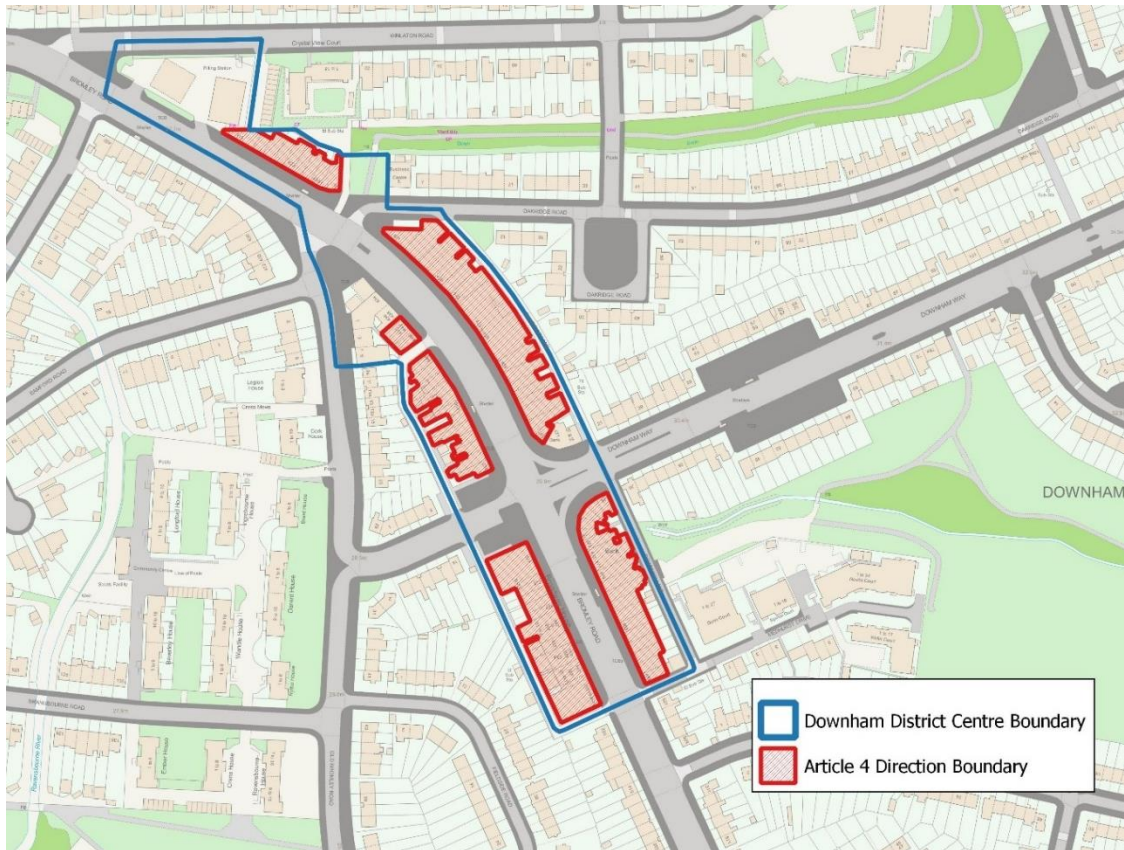


Table 5: Justification for including or excluding frontages across Downham District Centre within the revised Article 4 Direction area proposed.

Area	Justification
Include	
Bromley Road: 431 to 469,	Forms part of the primary shopping area with a low level of vacancy.
Bromley Road: 415 to 429	Although outside the primary shopping area, it is performing well with no vacant units.
Exclude	
Bromley Road: 436 to 438	Hand car wash and car dealership at the edge of the primary shopping in sui generis use whereby the permitted development does not apply.
Old Bromley Road: 3 to 9	Two class E uses and two residential units at the edge of centre which feels separated from the remainder of the centre given they do not front Bromley Road.

471 Bromley Road and 15 to 19 Downham Way	Betting shop at the edge of centre outside the primary shopping area. Use class in sui generis use whereby the permitted development does not apply.
Oakridge Road: 1 to 3	Vacant units at the edge of centre.
Bromley Road: 111	Petrol station at the edge of centre in sui generis use class whereby the permitted development does not apply.

Assessment of wholly unacceptable adverse impacts

- 3.13. The proposed revised Article 4 Direction covers 31% of Downham District Centre, which demonstrates a blanket approach has not been taken.
- 3.14. The Article 4 Direction area targets the commercial core of the town centre at frontages predominantly within the primary shopping area along Bromley Road, which includes a critical cluster of Class E units. Without an Article 4 Direction, the piecemeal introduction of ground floor residential uses into the commercial core could eliminate the critical mass of retailing and other main town uses which attract people into the town centre and therefore undermine the Centre's role as the largest town centre in the Borough's South Sub-area.

Lee Green District Centre

Figure 8: Map showing proposed revised Article 4 Direction area for Lee Green District Centre.

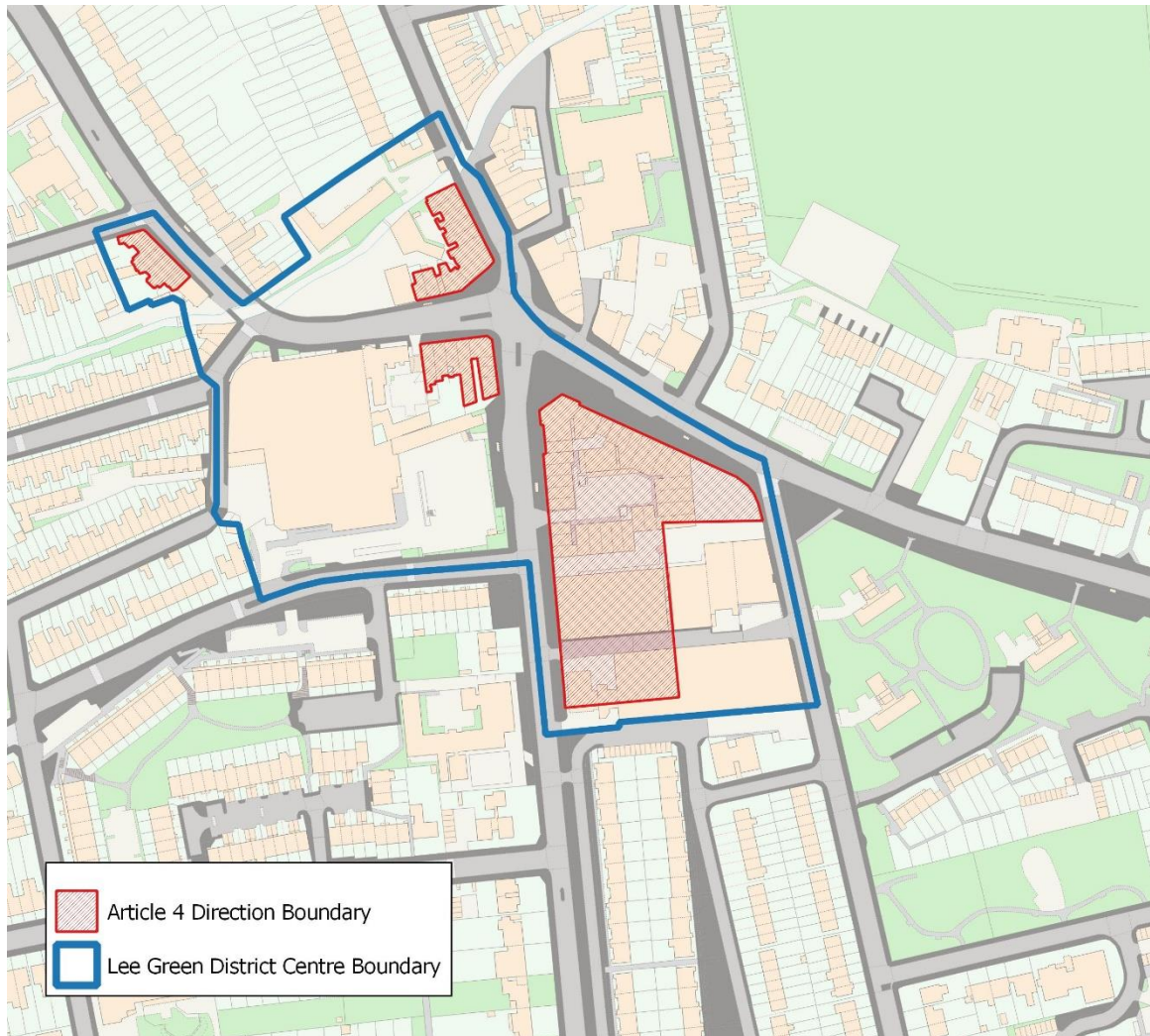


Table 6: Justification for including or excluding frontages within Lee Green District Centre across the revised Article 4 Direction area proposed.

Frontage	Justification
	Include
Burnt Ash Road: 6 to 12 Lee Road: 128 to 120 Lee High Road: 430 to 422, 343 to 351	Forms part of the primary shopping area with no vacant units
Lee High Road: 392 to 382	Whilst outside the primary shopping area, it is performing well with no vacant units.
Lee Gate Shopping centre	Site has been granted permission for demolition and comprehensive mixed-use redevelopment which includes

	maximising Class E floor space. See figure 9 for ground floor use masterplan.
Exclude	
Burnt Ash Road: 14	Sainsburys superstore above 1500 sqm so therefore the permitted development does not apply.
Lee High Road: 329 to 341	Car dealership at the edge of primary shopping area in sui generis use class whereby the permitted development does not apply.

Assessment of wholly unacceptable adverse impacts

- 3.15. The proposed Article 4 Direction covers 23% of Lee Green District Centre, demonstrates a blanket approach has not been undertaken.
- 3.16. Permitted development would undermine the continued evolution of Lee Green District Centre into a thriving commercial and cultural hub. This is because, without the Article 4 Direction, Lee Green would lose its ability to adapt to future circumstances, as the flexibility offered to commercial units to move to a variety of uses within Class E is lost.

Figure 9: Diagram showing ground floor use plan for Lee Gate Shopping Centre redevelopment



Blackheath District Centre

Figure 10: Map showing proposed revised Article 4 Direction area for Blackheath District Centre.

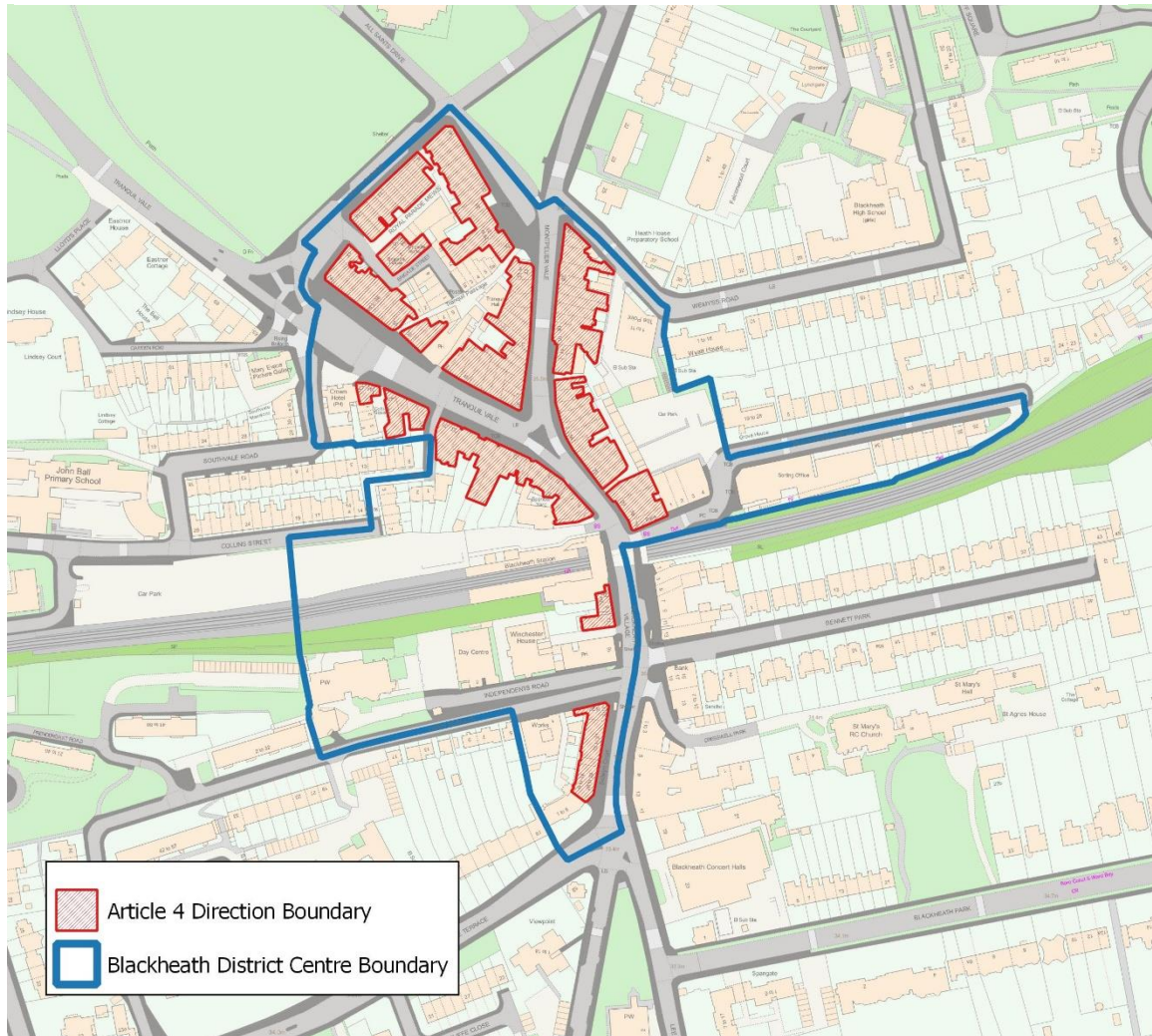


Table 7: Justification for including or excluding frontages across Blackheath District within the revised Article 4 Direction area proposed.

Frontage	Justification
	Include
Montpelier Vale: 2 to 36 and 1 to 47	Forms part of primary shopping area with no vacant units.
Blackheath Village: 0 to 16 and 1 to 11	
Royal Parade: 8 to 17	
Tranquil Vale: 1 to 49, 36 to 74 and 16	Forms part of primary shopping area with a low level of vacancy.

Blackheath Village: 20 to 34	Whilst outside the primary shopping area, it is performing strongly with no vacant units or takeaways.
Royal Parade Mews: Brigade House, Brigade Works and 44 to 50	Office space just outside the primary shopping area which contributes to the retail function of the centre.
Exclude	
Lawn Terrace: 1	Vacant restaurant outside the primary shopping area which feels separate from the remainder of the centre owing Lawn Terrace being mostly comprised of residential.
Blackheath Grove: 3 to 4	School in Use Class F whereby the permitted development does not apply.
Blackheath Grove: 1 to 2, Post Office and Sorting Office	Small cluster of Class E uses outside the primary shopping area which feels separated from the district centre due to positioning behind frontages on tranquil vale.
Blackheath Grove: 25 to 34	Residential
Blackheath Village: 16 Tranquil Vale: 52 and 49	Detached or semi-detached public houses in sui-generis use class whereby permitted development does not apply.
Independents Road: Winchester House	Hospital in use class F and therefore the permitted development does not apply.
Independents Road: 9	Residential

Assessment of wholly unacceptable adverse impacts

- 3.17. The proposed Article 4 Direction covers 18% of Blackheath District Centre, which demonstrates a blanket approach has not been taken.
- 3.18. The Article 4 Direction area targets the commercial core of the town centre at frontages predominantly within the primary shopping area along Blackheath Village, Tranquil Vale, Montpelier Vale and Royal Parade. The latter including a critical cluster of Class E units. Without an Article 4 Direction, the piecemeal introduction of ground floor residential uses into the commercial core could eliminate the critical mass of retailing and other main town uses which attract people into the town centre and therefore undermine the Centre's role as the largest town centre in the Borough's East Sub-area and a key visitor destination, with an active evening and night-time economy.

New Cross District Centre

Figure 11: Map showing proposed revised Article 4 Direction area for New Cross District Centre.

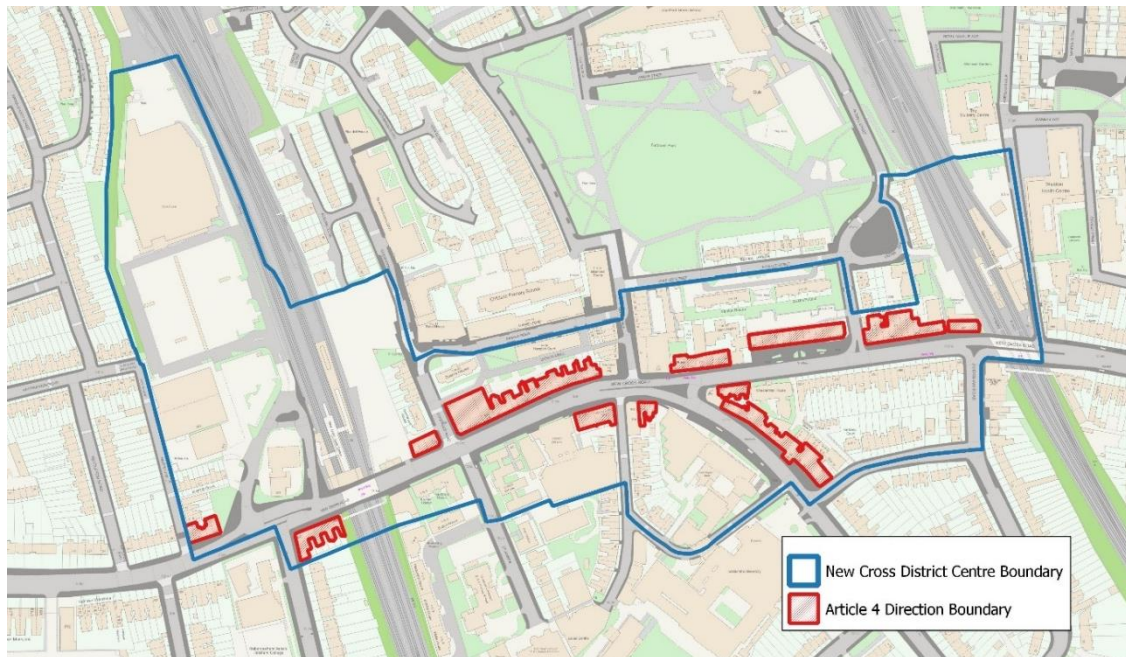


Table 8: Justification for the including or excluding frontages across New Cross District Centre within the revised Article 4 Direction area proposed.

Frontage	Justification
Include	
New Cross Road: 257 to 261, 267 to 321, 329 to 345, 355 to 383, 385 to 407.	Forms part of the primary shopping area with a low level of vacancy.
New Cross Road: 268 to 256 2a and 2d Lewisham Way to 316 New Cross Road	Whilst outside the primary shopping area, it is a strongly performing section at the eastern parade that is fully occupied with Class E uses.
New Cross Road: 332 to 324	Whilst outside the primary shopping area, it is a strong performing section of the high street with no vacant units. Furthermore, there is a strong presence of independent businesses such two Afro-Caribbean hairdressers, which meet the needs of a diverse community.
New Cross Road: 302 to 314	Whilst outside the primary shopping area, with 83% of units that are vacant this not a reflection of its unviability. This is because units 302 to 306 are intentionally made vacant to support the collaborative Enterprise Hub for Goldsmith University.

Lewisham Way: 1 to 39	Although outside of the primary shopping area, it is performing moderately well with around of third of units that are vacant. The presence of Goldsmiths University means the Lewisham Way has an important role in adding to the immediate offer for places to eat, drink and socialise for its students.
Exclude	
Clifton Rise: 4 to 10	An edge of centre location where 70% of units are vacant.
Clifton Rise: 2	Vacant night club at the edge of the primary shopping area in sui-generis use class where the permitted development does not apply.
Clifton Rise: 1a to 9a	An edge of centre of location with only one active use as a takeaway and the remaining consisting of residential units.
New Cross Road: Sainsbury's	Floorspace above 1500 sqm and therefore the permitted development does not apply.
New Cross Road Retail Park	Typology is comprised of retail warehouse units which do not lend themselves to residential conversion.
New Cross Road: 272, 322 and 323	Semi-detached public houses in sui-generis use class whereby the permitted development does not apply.

Assessment of wholly unacceptable adverse impacts

- 3.19. The proposed Article 4 Direction covers 6% of New Cross District Centre, which demonstrates a blanket approach has not been taken.
- 3.20. The Article 4 Direction area targets the commercial core of the town centre at frontages predominantly along New Cross Road which are particularly susceptible to the piecemeal introduction of ground floor residential use. Permitted development would undermine the continued evolution of New Cross District Centre into a thriving commercial and cultural hub. This is because, without the Article 4 Direction, New Cross District Centre would lose its ability to adapt to future circumstances, as the flexibility offered to commercial units to move to a variety of uses within Class E is lost.
- 3.21. Although Lewisham Way is outside of the primary shopping area, it consists of around 15 shops. Without an Article 4 Direction, the conversion of ground floor active frontages into residential units would undermine the ability of the centre to serve its student population - Goldsmiths College is located directly opposite.

Deptford District Centre

Figure 12: Map showing proposed revised Article 4 Direction area in relation to Deptford District Centre.

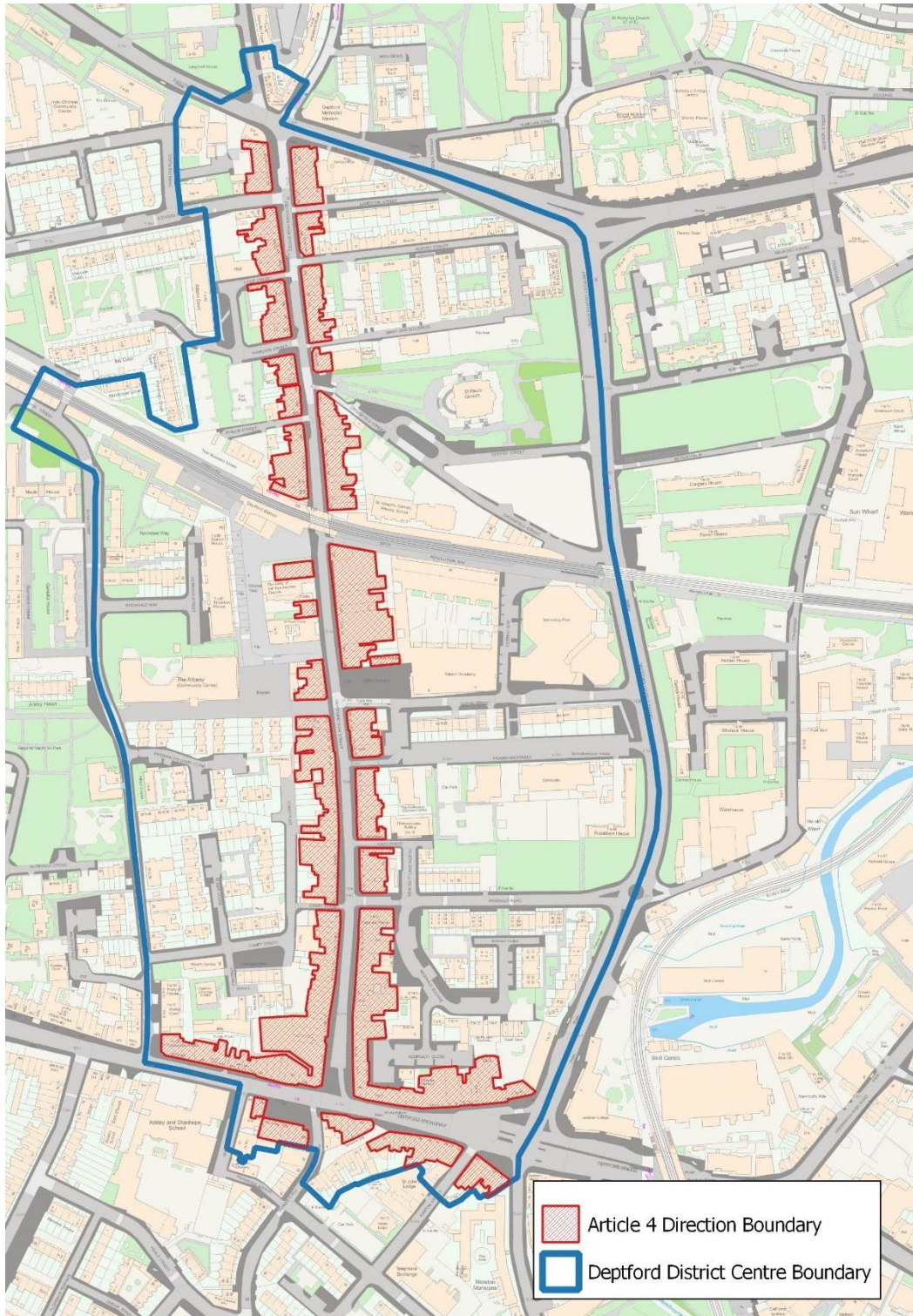


Table 9: Justification for including or excluding frontages across Deptford District Centre within the revised Article 4 Direction area proposed.

Frontages	Justification
Include	
New Cross Road: 483 to 505 New Cross Road: 508 to 496 Deptford Broadway: 2 to 24 and 36 to 52	Although outside the primary shopping area, it forms part of the town centre's southern core. It is performing moderately well with 30% of units that are either vacant or a takeaway and these are scattered within the frontage.
Deptford High Street: 1 to 179 and 268	Forms part of the primary shopping area with a low level of vacancy.
Deptford High Street: 181 to 227 and 170 to 220	Although outside the primary shopping area, it forms part of the town centre's northern core. It is performing strongly with only 12% of units that either vacant or a takeaway and these scattered within the frontage. Furthermore, there is a presence of independent businesses, such as a Vietnamese supermarket and halal butchers, that meet the needs of the borough's diverse communities.
Giffin St: 1 Market House	Whilst outside the primary shopping area, the cafe fronts a public square and therefore contributes to placemaking.
Douglas Way: 2a to 2c	Whilst outside the primary shopping area, it fronts a public square and therefore contributes to placemaking.
Exclude	
Tanners Hill: 7 to 31	Peripheral town centre location where the majority of ground floor uses have now been converted to residential; only 3 active main town centre uses remaining.
Deptford Church Street: 1 to 17	Peripheral town centre location which is perceived as being separate from the remainder of the town centre due to facing eastwards.
New King Street: 2 to 14 Watergate Street: 5 to 9	Peripheral town centre location which is perceived as being separate from the remainder of town centre owing to the break caused by Evelyn Street.
Deptford Broadway: 460 New Cross Road: 490 Deptford High Street: 215	Semi-detached public in sui-generis use class and therefore the permitted development does not apply.
Unit 2, St Paul's House, 3 Market Yard	Bar in sui-generis use and therefore the permitted development does not apply.

Deptford Market Yard: Unit 1 to 14 Deptford Railway Station Arches Resolution Way	The typology of railway arch units does not lend itself to residential conversion.
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Assessment of wholly unacceptable adverse impacts

- 3.22. The proposed revised Article 4 Direction covers 11% of Deptford District Centre, which demonstrates a blanket approach has not been taken.
- 3.23. The Article 4 Direction area targets the commercial core of the town centre at frontages predominantly along Deptford and New Cross Road which are particularly susceptible to the piecemeal introduction of ground floor residential use. Permitted development would undermine the continued evolution of Deptford District Centre into a thriving commercial and cultural hub, an important aspect of the new spatial strategy for the Borough. This is because, without the Article 4 Direction, Deptford District Centre would lose its ability to adapt to future circumstances, as the flexibility offered to commercial units to move to a variety of uses within Class E is lost.

Local Centres

3.24. The proposed revised Article 4 Direction boundaries for the Borough's fourteen local centres are set in the maps below alongside the supporting justification.

Grove Park Local Centre

Figure 13: Map of the proposed revised Article 4 Direction coverage in relation to Grove Park Local Centre.



Table 10: Justification for including or excluding frontages across Deptford District Centre within the revised Article 4 Direction area proposed.

Frontages	Justification
	Include
Baring Road: 384a to 372, 366 to 342 and 299 to 321, 293 to 303	Strong performing section of the local centre with no vacant units.
Baring Road: 309b to 317	Strong performing section of the local centre with a low level of vacancy.
Downham Way: 650 to 636	Although an underperforming section of the local centre where 50% of units are vacant or takeaways, it does form a large

	part of the centre's core consisting of 10 units. Therefore, the loss of these units to residential could result in the centre being demoted from a local centre to a neighbourhood parade.
Exclude	
Baring Road: 366 to 364	Betting shop at the end of row of shops which falls within sui-generis use class and therefore the permitted development does not apply.
589 Downham Way	A single Class E unit which feels separate from the rest local centre owing to the adjacent car park.
Baring Road: 319 to 327	Row of four units at the edge of centre which does not contribute to the retail function of shopping centre since it is comprised of vacant unit, residential unit, and an estate agent.
Baring Road: 384b	Vacant unit at the edge of the local centre.
Baring Road: 325 to 327	Residential unit at the edge of centre.
Baring Road: 293 and 307	Floorspace of 20sqm means conversion to residential is unlikely.
The Baring Hall Hotel	Detached public house in sui generis use where permitted development does not apply.

Assessment of unacceptable adverse impacts

- 3.25. The proposed revised Article 4 Direction covers 23% of Grove Park Local Centre, which demonstrates a blanket approach has not been applied.
- 3.26. Located in the southeast of the Borough, Grove Park is somewhat disconnected from its surrounding neighbourhoods. This is in part owing to railway lines to the northeast and southwest, as well as the A205 South Circular road, which create physical barriers to movement and contribute to severance. Therefore, without an Article 4 Direction, the loss of ground floor premises would result in a less attractive and diverse offer for residents of Grove Park, increasing the likelihood of unsustainable car journeys to nearby larger district centres such as Downham and Lee Green.

Crofton Park Local Centre

Figure 14: Map showing revised modified Article 4 Direction area for Crofton Park Local Centre.

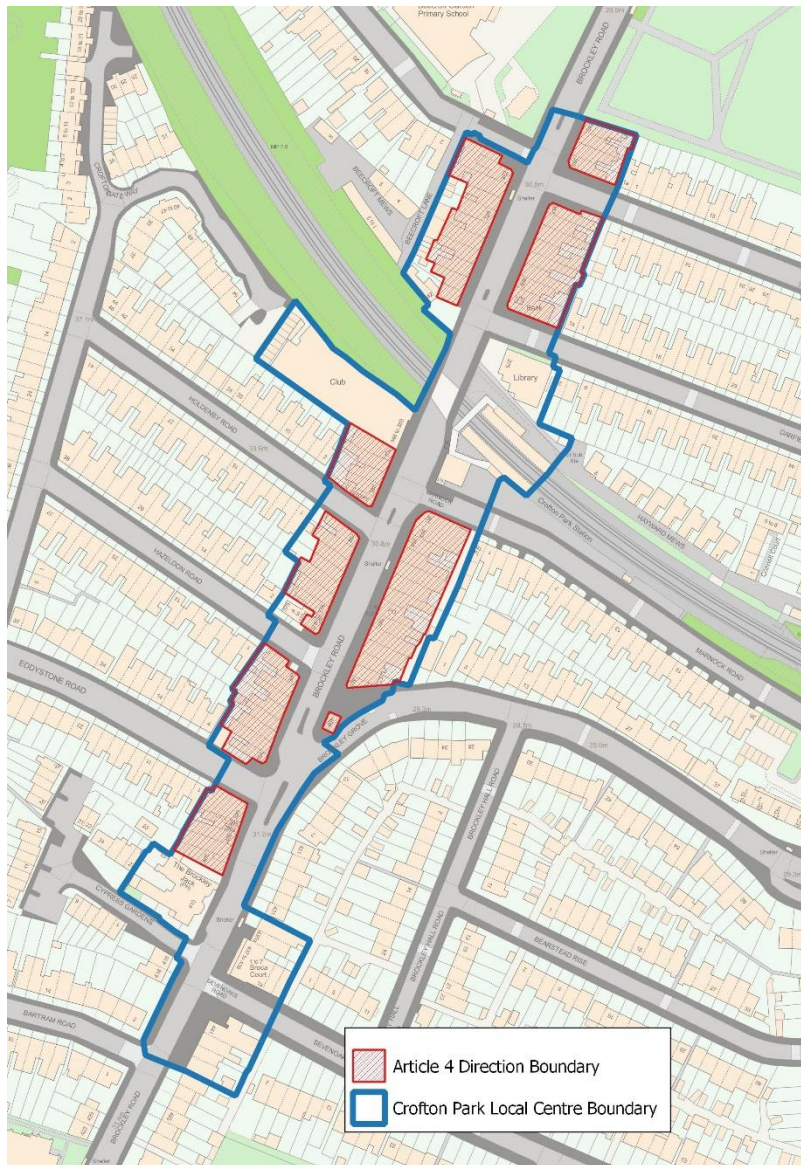


Table 11: Justification for including or excluding frontages across Crofton Park Local Centre within the revised Article 4 Direction area proposed.

Frontages	Justification
Include	
Brockley Road: 322 to 340, 352 to 409, 349 to 371, 381 to 407	Forms the core of local centre with some vacant units however these are scattered within the frontage.
Exclude	
Brockley Road: 410	Public house in sui generis use at the edge of centre where permitted development does not apply.

Brockley Road: 346 to 350	Ball room in sui-generis use class and therefore permitted development does not apply.
Brockley Road: 375	Library in Class F and therefore permitted development does not apply.
Brockley Road: 433 to 4445	Cluster of seven units which feels separated from the local centre owing to the adjacent stretch of residential properties at Brockley Road and Brockley Grove. Furthermore, 42% of units are takeaways.

Assessment of wholly unacceptable adverse impacts:

- 3.27. The proposed Article 4 Direction covers 26% of Crofton Park local centre which demonstrates a blanket approach has not been applied.
- 3.28. A defining characteristic of the Borough's western sub-area is its historical network of local centres that serve its neighbourhoods and communities, and in this case, Crofton Park neighbourhood. Without an Article 4 Direction, this characteristic will be significantly weakened. The reason is that the piecemeal introduction of ground-floor residential uses creates incoherent street frontages, undermining the vitality and viability of the centre.

Honor Oak and Brockley Rise Local Centre

Figure 15: Map showing proposed revised Article 4 Direction area for Honor Oak and Brockley Rise Local Centre.



Table 12: Justification for including and excluding frontages within Honor Oak and Brockley Rise Local Centre within the revised Article 4 Direction area proposed.

Frontages	Justification
Include	
Honor Oak Park: 78 to 38 and 63 to 35, 1 to 5	Forms the eastern core of local centre with a cluster of Class E uses. There are 2 vacant units and 1 residential unit however these scattered within the frontage.
Brockley Rise: 104 to 58, 139 to 131	Forms the western core of local centre with a critical cluster Class E unit and only 3 vacant units.
Exclude	
Brockley Rise: 129	MOT centre at edge of row of shops in sui-generis use class where the permitted development does not apply.
Honor Oak: 40 to 38 and 25 to 29	Residential units at the edge of the local centre.

Brockley Rise: 119 to 127	Small cluster of four units which feels separated from the local centre owing the adjacent residential street at Stondon Park.
Brockley Rise: 56	Public House at the edge of the local centre in sui-generis use class where the permitted development does not apply.

Assessment of wholly unacceptable adverse impacts:

- 3.29. The proposed Article 4 Direction covers 34% of Honor Oak and Brockley Rise Local Centre, which demonstrates a blanket approach has not been applied.
- 3.30. A defining characteristic of the Borough's western sub-area is its historical network of local centres that serve its neighbourhoods and communities, and in this case, Honor Oak neighbourhood. Without an Article 4 Direction, this characteristic will be significantly weakened. The reason is that the piecemeal introduction of ground-floor residential uses creates incoherent street frontages, undermining the vitality and viability of the centre.

Evelyn Street Local Centre

Figure 16: Map showing proposed revised Article 4 Direction area for Evelyn Street Local Centre.

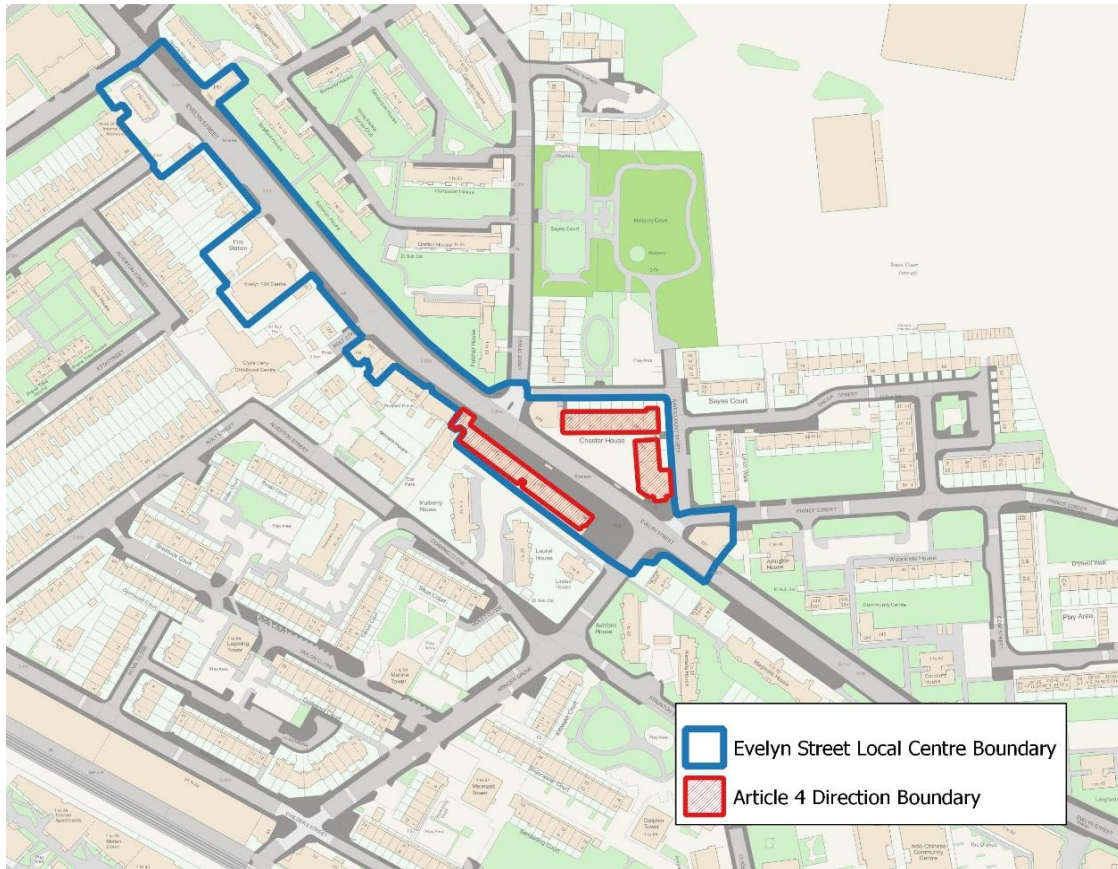


Table 13: Justification for including and excluding frontages across Evelyn Street Local Centre within the Article 4 Direction area proposed.

Frontages	Justification
	Include
Evelyn Street: 292 to 232 and 301 to 315	Forms the core of the local centre with a cluster of Class E uses. There are two vacant units however these are scattered within the frontage.
Evelyn Street: 321 and 299	Betting shop at edge of the local centre in sui-generis use class where the permitted development does not apply.
Evelyn Street: 195	Vacant public house at the edge of the local centre in sui-generis use class where the permitted development does not apply.
Evelyn Street: 150 to 164 and 166	Two units (one vacant and another a fast-food drive-through restaurant) which feels separate from the remainder of the local centre owing to the adjacent continuous

Evelyn Street: 186	residential uses between 184 and 166, Evelyn Street. Fire Station at the edge of the local centre in sui generis use class where the permitted development does not apply.
Evelyn Street: 190	Community centre at the edge of the local centre in Use Class F where the permitted development does not apply.
Evelyn Street: 204 to 210	Row of four units at the edge of centre which does not contribute to the retail function since it is comprised of two residential frontages and two takeaway units.

Assessment of wholly unacceptable adverse impacts:

- 3.31. The proposed Article 4 Direction covers 11% of Evelyn Street Local Centre, which demonstrates a blanket approach has not been applied.
- 3.32. Evelyn Street Local Centre is the only centre within the Borough that is a short walking distance (5 minutes) to the neighbourhood of North Deptford. Therefore, without an Article 4 Direction, the loss of ground floor premises would result in a less attractive and diverse offer for residents of North Deptford, increasing the likelihood of unsustainable car journeys to nearby larger district centres such as Deptford and New Cross.

Kirkdale Local Centre

Figure 17: Map showing proposed revised Article 4 Direction area for Kirkdale Local Centre.

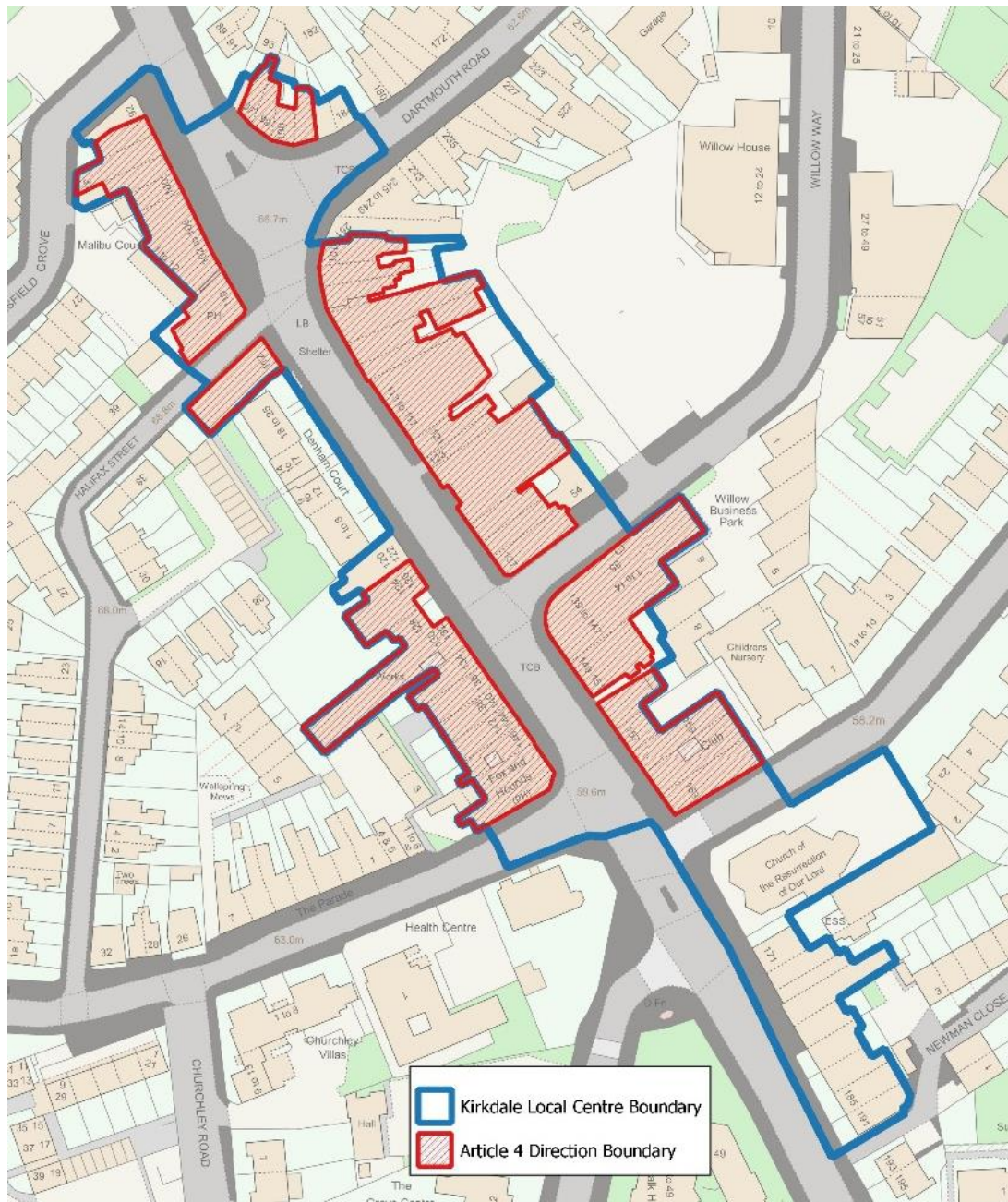


Table 14: Justification for including or excluding frontages across Kirkdale Local Centre within the revised Article 4 Direction area proposed.

Frontages	Justification
	Include
Dartmouth Road: 190 to 188	Forms the core of the local centre with a cluster of Class E uses. There are two vacant units and one takeaway however these are scattered within the frontage.
Kirkdale Road: 94 to 112, 124 to 150	

Kirkdale Road: 101 to 163	
Exclude	
Kirkdale Road: 98	Vacant unit at the edge of the local centre.
Kirkdale Road: 171 o 191	Edge of centre location where 77% of ground floor units have now been converted to residential.
Kirkdale Road: 165-169	Church in periphery of the local centre in class F whereby permitted development does not apply.
Kirkdale Road: 120-122	Betting office at the edge of the parade in sui-generis use class and therefore the permitted development does not apply.
Kirkdale Road: 186a to 184	Residential units at the edge of centre

Assessment of wholly unacceptable adverse impacts:

- 3.33. The proposed Article 4 Direction covers 40% of Kirkdale Local Centre, which demonstrates a blanket approach has not been taken.
- 3.34. A defining characteristic of the Borough's western sub-area is its historical network of local centres that serve its neighbourhoods and communities, and in this case, Sydenham Hill neighbourhood. Without an Article 4 Direction, this characteristic will be significantly weakened. The reason is that the piecemeal introduction of ground-floor residential uses creates incoherent street frontages, undermining the vitality and viability of the centre.

Brockley Cross Local Centre

Figure 18: Map showing proposed revised Article 4 Direction area for Brockley Cross Local Centre



Table 15: Justification for including and excluding frontages in Brockley Cross Local Centre within the revised Article 4 Direction area proposed.

Frontages	Justification
Include	
Brockley Road: 169 to 199 and 180 Brockley Cross: 23 to 25 Harefield Road: 1 to 7 Coulgate Street: 8 to 10 and 12	Forms the core of the local centre at southern end with a cluster of Class E uses, with no vacant units.
Brockley Cross: 28 to 16, 14 to 2, 9 to 3 Malpas Road 259 to 257	Forms the core of the local centre at its northern end with only 3 vacant units and these are scattered within the frontages. Furthermore, there is a strong presence of businesses providing goods and services that meet the needs of the Borough's diverse communities such as Afro-Caribbean hairdressers.
Coulgate Street: 4 to 7	Active frontages consisting of two coffee shops and an architecture practice which contributes to place-making of the square fronting Brockley station.
Exclude	
Brockley Road: 188	Vacant unit at the edge of centre.
Brockley Road: 201	Royal Mail Sorting Office in sui generis use class and therefore permitted development does not apply.
Malpas Road 246 to 248 Brockley Cross 1a to 1b	Underperforming edge of centre location where 75% of units are vacant.
Endwell Road: 100 to 110	Edge of centre location which feels separated from the remainder of the centre.
Malpas Road: 253 to 256	Two residential units at the edge of centre.
Brockley Road: 184	Detached public house in Sui-generis use class and therefore the permitted development does not apply.
Brockley Road 186	Edge of centre betting shop in sui generis use and therefore the permitted development does not apply.

Assessment of wholly unacceptable adverse impacts:

- 3.35. The proposed revised Article 4 Direction covers 20% of Brockley Local Centre, which demonstrates a blanket approach has not been taken.

3.36. A defining characteristic of the Borough's western sub-area is its historical network of local centres that serve its neighbourhoods and communities, and in this case, Brockley neighbourhood. Without an Article 4 Direction, this characteristic will be significantly weakened. The reason is that the piecemeal introduction of ground-floor residential uses creates incoherent street frontages, undermining the vitality and viability of the centre.

Lewisham Way Local Centre

Figure 19: Map showing proposed revised Article 4 Direction area for Lewisham Way Local Centre.

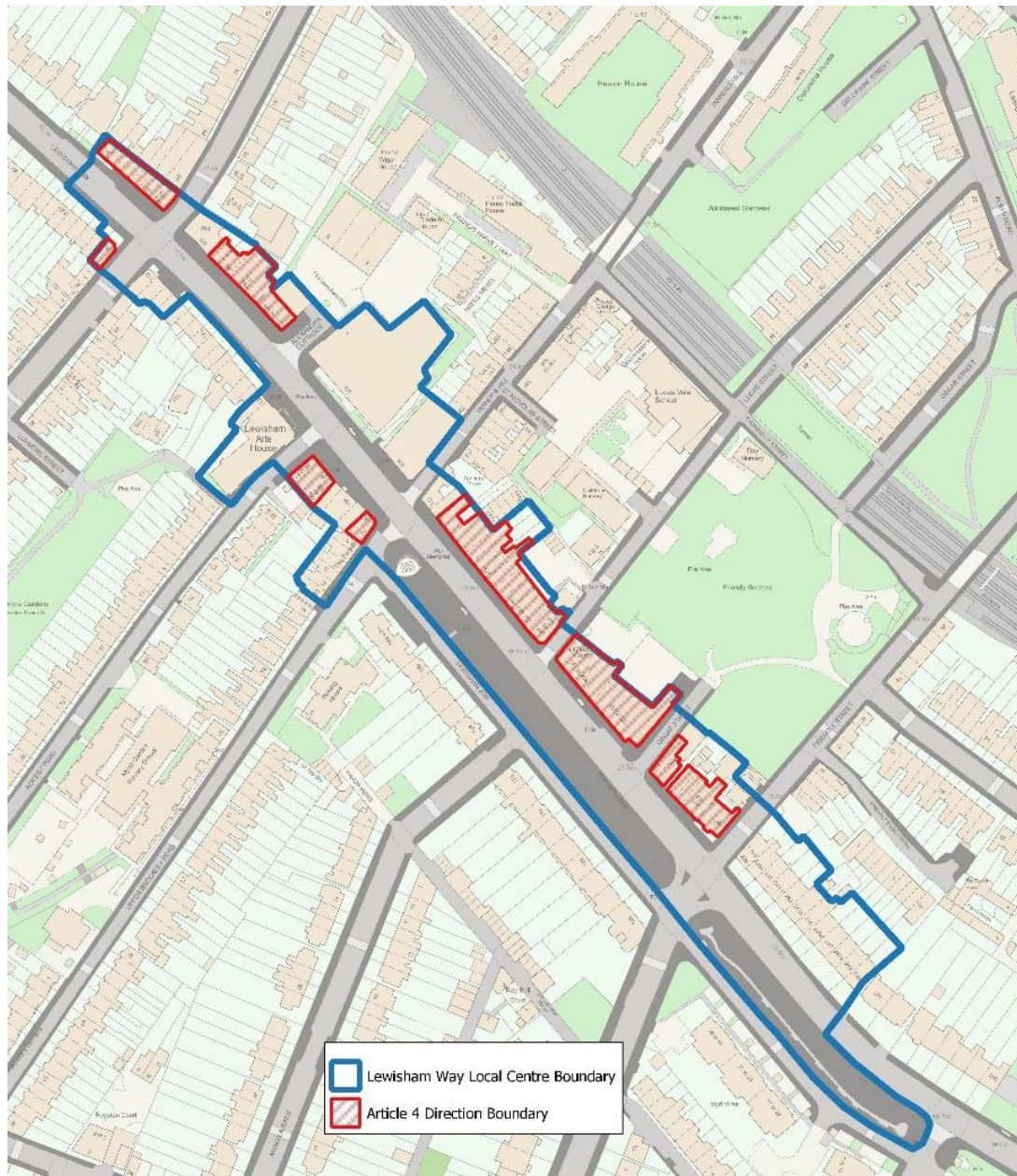


Table 16: Justification for including or excluding frontages in Lewisham Way Local Centre within the revised Article 4 Direction area proposed.

Frontages	Justification
	Include
Lewisham Way: 119 to 133, 137 to 147, 175 to 201, 207 to 227, 146 to 150, 110	Forms the core of the local centre with a cluster of Class E uses. There are two vacant units and one takeaway however these are scattered within the frontage.
	Exclude

Lewisham Way: 155	B8 Storage and Distribution unit and therefore the permitted development would not apply.
Lewisham Way: 169 to 173, 152 to 156, 112 to 118	Residential units.
Lewisham Way: 239 to 249a	60% of units are now residential.
Upper Brockley Road: 8 to 13	Underperforming edge of centre location whereby 66% of units are either vacant, residential or a takeaway.
Lewisham Way: 135	Public house in sui generis use whereby the permitted development does not apply.
Lewisham Way 138	Vacant unit at the edge of centre.

Assessment of wholly unacceptable adverse impacts:

- 3.37. The proposed revised Article 4 Direction covers 20% of Lewisham Way Local Centre, which demonstrates a blanket approach has not been taken.
- 3.38. A defining characteristic of the Borough's western sub-area is its historical network of local centres that serve its neighbourhoods and communities, and in this case, Brockley neighbourhood. Without an Article 4 Direction, this characteristic will be significantly weakened. The reason is that the piecemeal introduction of ground-floor residential uses creates incoherent street frontages, undermining the vitality and viability of the centre.

New Cross Road

Figure 20: Map showing proposed revised Article 4 Direction area for New Cross Road Local Centre.



Table 17: Justification for including or excluding frontages across New Cross Road Local Centre within the revised Article 4 Direction area proposed.

Frontages	Justification
	Include
Queens Road: 387 to 401 New Cross Road: 180 to 160 and 157 to 197	Forms the southern core of the local centre and is performing moderately and largely consisting of class E units. 40% of units are either a takeaway or vacant however these are scattered within the frontage. Furthermore, there is a strong presence of independent businesses, such a Latin

	American restaurants and supermarkets, which meet the needs of a diverse community.
New Cross Road: 158 to 130, 109 to 147	Forms the northern core of the local centre and is performing moderately and largely consisting of class E units. 20% of units are either a takeaway or vacant however these are scattered within the frontage.
Exclude	
New Cross Road: 199 to 205	Sorting office at the edge of centre in sui generis use whereby the permitted development does not apply.
New Cross Road: 105	Church at the edge of centre in sui-generis use class whereby the permitted development does not apply.
New Cross Road: 109 to 117	Peripheral town centre location with only active class E unit; the remainder are residential units as well as two takeaway units.
New Cross Road: 118 to 128	Cluster of four ground floor residential units and one takeaway and therefore the permitted development would not apply.
New Cross Road: 116 to 118	Live music in sui-generis use class therefore the permitted development does not apply.
New Cross Road: 155	Semi-detached public house in sui-generis use class whereby the permitted development would not apply.
Queens Road: 385	Edge of centre community centre in use Class F whereby the permitted development does not apply.

Assessment of wholly unacceptable adverse impacts:

- 3.39. The proposed Article 4 Direction covers 26% of New Cross Road Local Centre, which demonstrates a blanket approach has not been taken.
- 3.40. A defining characteristic of the Borough's western sub-area is its historical network of local centres that serve its neighbourhoods and communities, and in this case, Telegraph Hill neighbourhood. Without an Article 4 Direction, this characteristic will be significantly weakened. The reason is that the piecemeal introduction of ground-floor residential uses creates incoherent street frontages, undermining the vitality and viability of the centre.

Ladywell Local Centre

Figure 21: Map showing the proposed revised Article 4 Direction area for Ladywell Local Centre.



Table 18: Justification for including or excluding frontages across Ladywell Local Centre within the revised Article 4 Direction area proposed.

Frontages	Justification
Include	
Ladywell Road: 107 to 71, 38 to 54 Algernon Road: 228 to 226 and 251 to 259	Forms the core of the local centre, and strongly performing within only 1 vacant unit and two takeaways and these are scattered within the frontages.
Ladywell Road: 93 to 99	Cluster of three currently vacant units however this is owing to it being a recently completed development.
Exclude	
Ladywell Road: 74 to 78	Residential
Ladywell Road: 80	Semi-detached public house in sui-generis use and therefore the permitted does not apply.
Ladywell Road: 111 to 109	Convenience store and takeaway at the edge of centre which feels separated from the remainder of the centre owing to the break at Gillian Street.
Algernon: 224 to 222	Tattoo parlour and takeaway at the edge of centre in sui-generis use class whereby the permitted development does not apply.

Assessment of wholly unacceptable adverse impacts:

- 3.41. The proposed revised Article 4 Direction covers 33% of Ladywell Local Centre, which demonstrates a blanket approach has not been taken.
- 3.42. A defining characteristic of the Borough's western sub-area is its historical network of local centres that serve its neighbourhoods and communities, and in this case, Ladywell neighbourhood. Without an Article 4 Direction, this characteristic will be significantly weakened. The reason is that the piecemeal introduction of ground-floor residential uses creates incoherent street frontages, undermining the vitality and viability of the centre.

Bellingham Local Centre

Figure 22: Map showing proposed revised Article 4 Direction for Bellingham Local Centre.

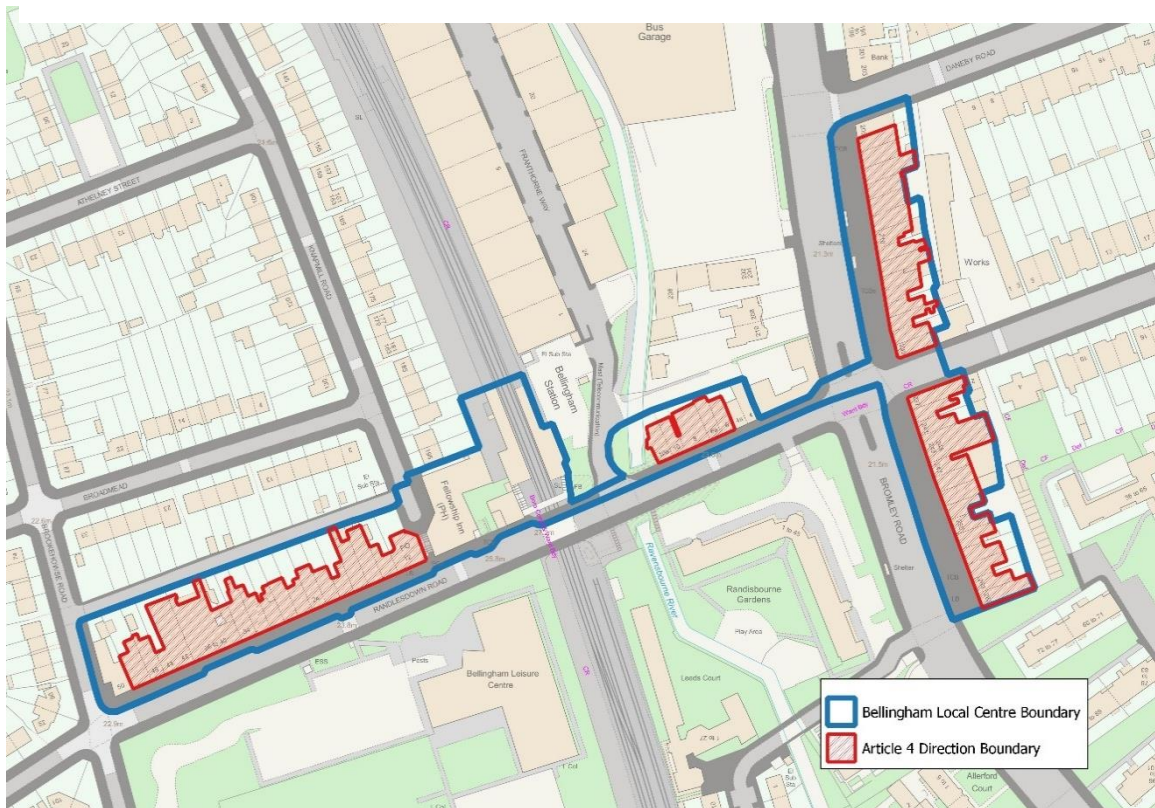


Table 19: Justification for including or excluding of frontages across Bellingham Local Centre within the Article 4 Direction area proposed.

Frontages	Justification
	Include
Randlesdown Road: 48 to 12 and 10 to 6.	Forms western core of the local centre and is strongly performing with only three vacant units and these are scattered within the frontage.
Bromley Road: 237 to 265	Forms the eastern core of the local centre, mostly consisting of class E uses. 31% of units are takeaways, however, these are scattered within the frontage.
	Exclude
Randlesdown Road: 50	Takeaway at the edge of centre in sui generis use class whereby the permitted development does not apply.
Randlesdown Road: Fellowship Inn	Detached public house in sui-generis use class whereby the permitted development does not apply.
Randlesdown Road: 4 and 4a	One vacant unit and one takeaway at the edge of centre.

Bromley Road: 205 to 207	Takeaway at the edge of centre in sui-generis use class whereby the permitted development does not apply.
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Assessment of wholly unacceptable adverse impacts:

- 3.43. The proposed Article 4 Direction covers 33% of Bellingham Local Centre, which demonstrates a blanket approach has not been taken.
- 3.44. Bellingham plays an essential role in providing a range of shops and services that meet the day-to-day needs of residents of Bellingham Neighbourhood, while also offering a place for to meet and socialise nearby. In such centres, the loss of an individual ground floor premises in the middle of a parade, could have significant implications for the future success of the centre. Undermining the vitality of these centres by introducing piecemeal residential units within these frontages would result in a less attractive offer for residents, forcing them to undertake unsustainable car journeys to other larger district centres such as Downham to meet their day-to-day needs.

Lee Station Local Centre

Figure 23: Map showing proposed revised Article 4 Direction coverage for Lee Station Local Centre.

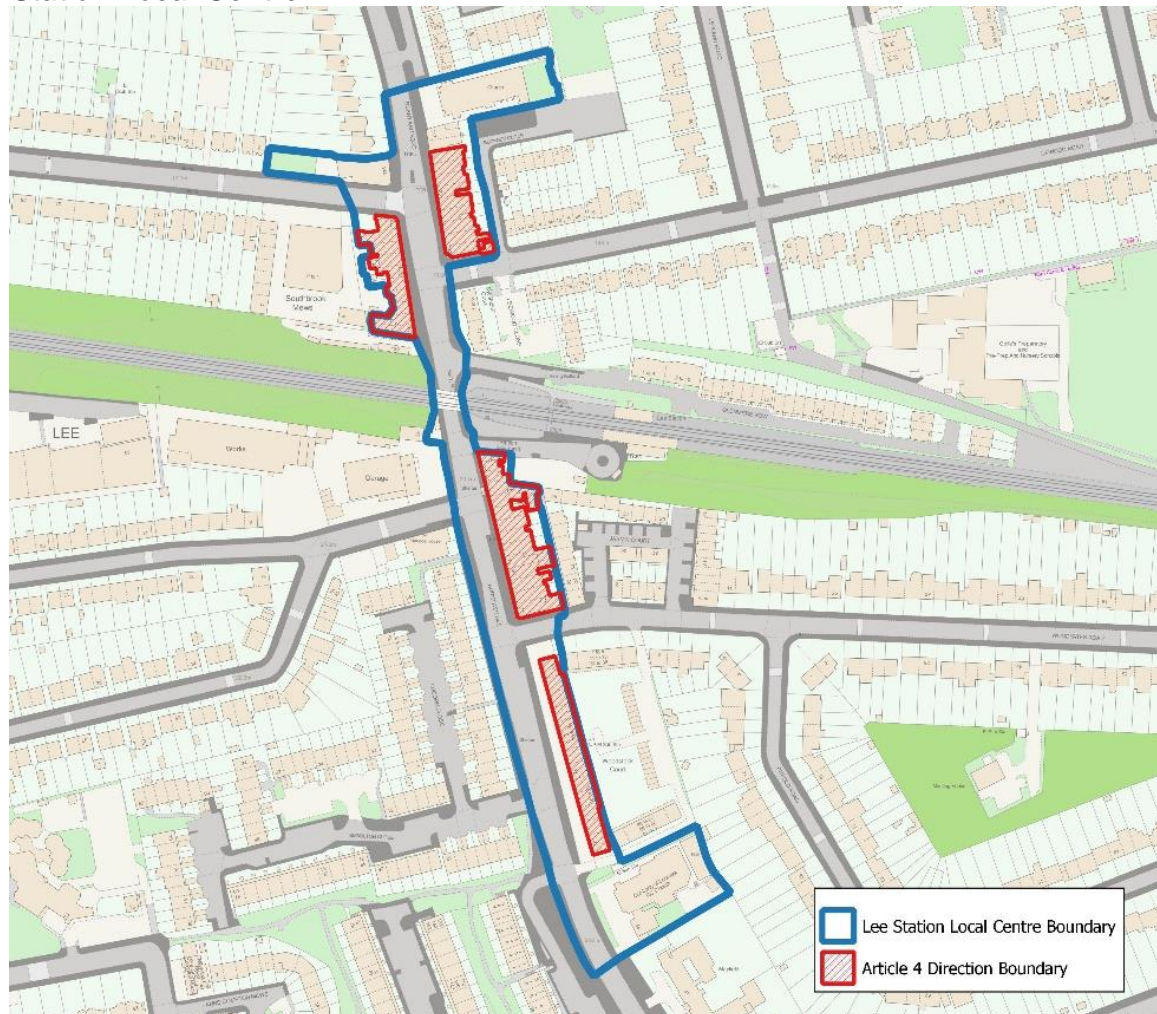


Table 20: Justification for including or excluding frontages across Lee Station Local Centre within the revised Article 4 Direction area proposed.

Frontages	Justification
Include	
Burnt Ash Road: 118 to 136 and 133 to 117	Forms the northern core of the centre and is mainly comprised of class E units with no vacant units.
Burnt Ash Hill: 1 to 21 and Station Approach.	Forms the southern core off the centre and is mainly comprised of class E units with only 2 vacant units and these are scattered within the frontage.
Exclude	
Burnt Ash Hill: 45	Church in sui-generis use class whereby the permitted development does not apply.
Burnt Ash Road: 116	Public house at the edge use class whereby the permitted development does not apply.

Burnt Ash Hill: 113 to 117	Two takeaway units at the edge of centre in sui-generis use whereby the permitted does not apply.
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Assessment of wholly unacceptable adverse impacts:

- 3.45. The proposed Article 4 Direction covers 20% of Lee Station Local Centre, which demonstrates a blanket approach has not been taken.
- 3.46. Lee Station plays an essential role in providing a range of shops and services that meet the day-to-day needs of residents of Lee Neighbourhood, while also offering a place for to meet and socialise nearby. In such centres, the loss of an individual ground floor premises in the middle of a parade, could have significant implications for the future success of the centre. Undermining the vitality of these centres by introducing piecemeal residential units within these frontages would result in a less attractive offer for residents, forcing them to undertake unsustainable car journeys to other larger District Centres such as Lee Green to meet their day-to-day needs.

Hither Green Lane Local Centre

Figure 24: Map showing the proposed revised Article 4 Direction area for Hither Green Lane Local Centre.

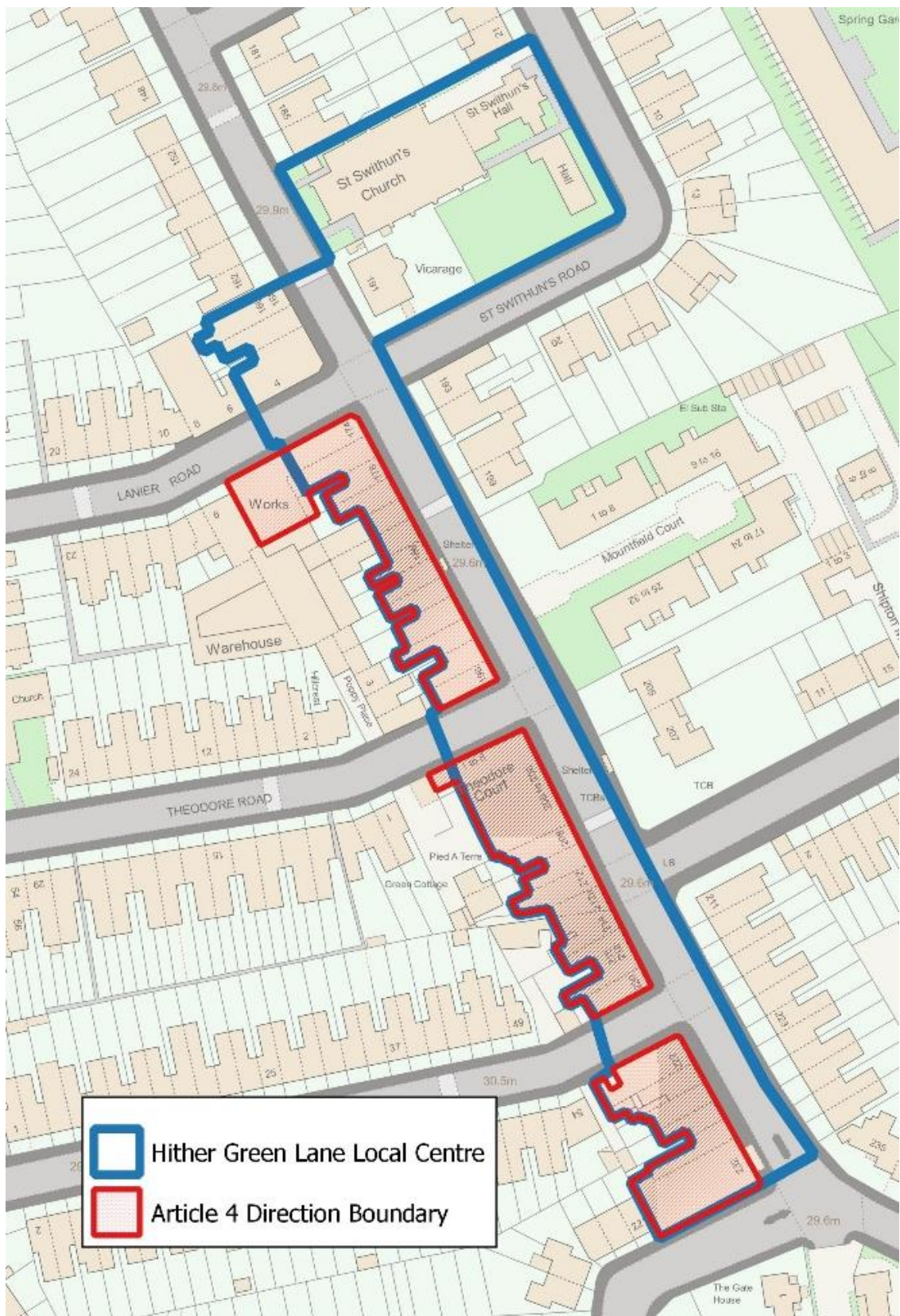


Table 21: Justification for the inclusion or exclusion of frontages in Hither Green Lane Local Centre within the Article 4 Direction area applied.

Frontages	Justification
Include	
Hither Green Lane: 232 to 174	Forms the core local centre mainly consisting of class E units. It is performing moderately well with 26% of units either vacant or a takeaway and these are scattered within the frontage.
Exclude	
Hither Green Lane: 191	Church at edge of centre in sui-generis use class whereby the permitted development does not apply.
Hither Green Lane: 170 to 166	3 units at the edge of centre whereby the permitted development would not apply given they consist of a residential unit, a betting shop and a laundrette.

Assessment of wholly unacceptable adverse impacts:

- 3.47. The proposed revised Article 4 Direction covers 30% of Hither Green Lane Local Centre, which demonstrates a blanket approach has not been taken.
- 3.48. Hither Green Lane Local Centre plays an essential role in providing a range of shops and services that meet the day-to-day needs of residents in Hither Green Neighbourhood, while also offering a place for to meet and socialise nearby. In such centres, the loss of an individual ground floor premises in the middle of a parade, could have significant implications for the future success of the centre. Undermining the vitality of these centres by introducing piecemeal residential units within these frontages would result in a less attractive offer for residents, forcing them to undertake unsustainable car journeys to other larger major centres such as Catford and Lewisham to meet their day-to-day needs.

Staplehurst Road Local Centre

Figure 25: Map showing proposed revised Article 4 Direction area for Hither Green Lane Local Centre



Table 22: Justification for the inclusion or exclusion of frontages in Staplehurst Road Local Centre within the revised Article 4 Direction area applied.

Frontages	Justification
Include	
Hither Green Lane: 232 to 174	Forms the core local centre mainly consisting of class E units. It is performing moderately well with 26% of units either vacant or takeaways.
Exclude	
Staplehurst Road: 18 to 28	Underperforming section of the local centre with only one active class E unit.

	The remaining includes two vacant units and two ground floor residential units.
Staplehurst Road: 14	Semi-detached public whereby the permitted development does not apply.

Assessment of wholly unacceptable adverse impacts:

- 3.49. The proposed revised Article 4 Direction covers 22% of Staplehurst Road Local Centre, which demonstrates a blanket approach has not been taken.
- 3.50. Staplehurst Road Local Centre plays an essential role in providing a range of shops and services that meet the day-to-day needs of residents in Hither Green Neighbourhood, while also offering a place for to meet and socialise nearby. In such centres, the loss of an individual ground floor premises in the middle of a parade, could have significant implications for the future success of the centre. Undermining the vitality of these centres by introducing piecemeal residential units within these frontages would result in a less attractive offer for residents, forcing them to undertake unsustainable car journeys to other larger major centres such as Catford and Lewisham to meet their day-to-day needs.

Downham Way Local Centre

Figure 26: Map showing proposed revised Article 4 Direction area for Downham Way Local Centre.

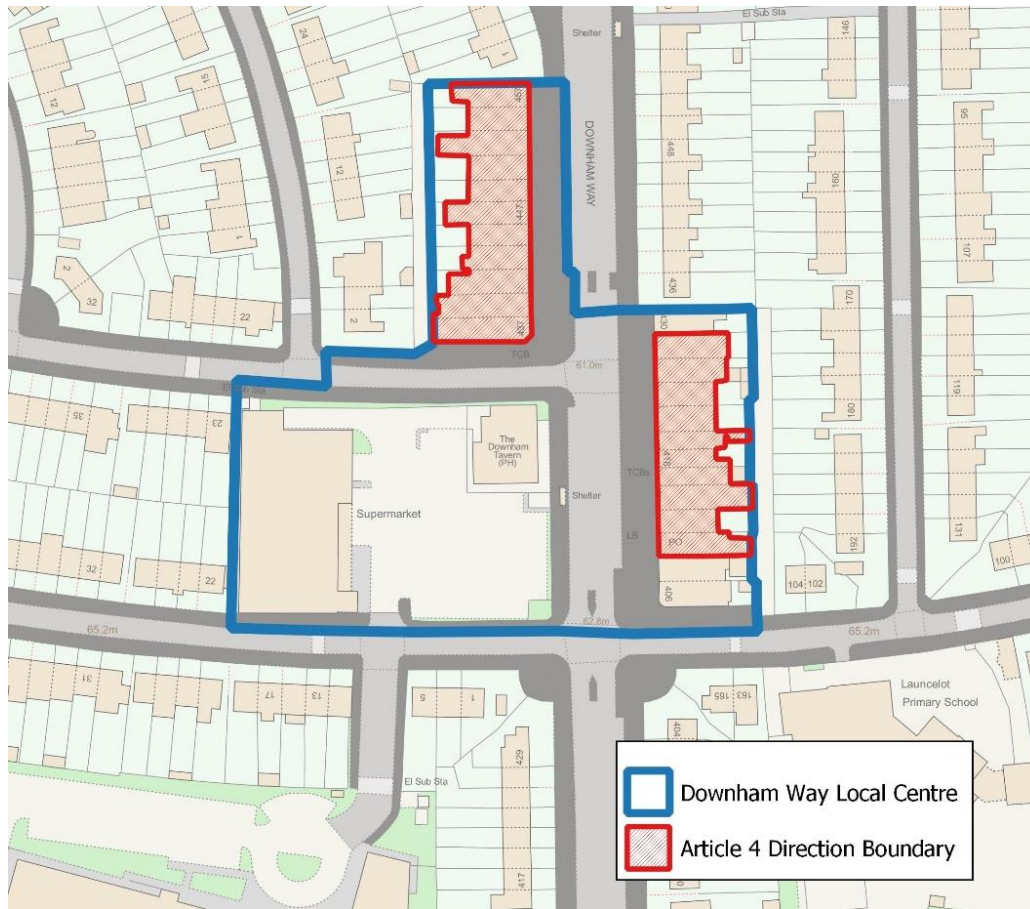


Table 23: Justification for the inclusion or exclusion of frontages in Downham Way Local Centre within the Article 4 Direction area applied.

Frontages	Justification
Include	
Downham Way: 437 to 457	Forms the northern core of the centre with no vacant units.
Downham Way: 410 to 428	Forms the southern core of the centre with no vacant units.
Exclude	
Downham Way: 431 to 435	Typology of retail warehouse does not lend itself to residential conversion.
Downham Way: 435	Detached public house in sui generis use whereby the permitted development does not apply.
Downham Way: 406 to 408	Takeaway and betting shop at the edge of centre in sui generis use class whereby the permitted development does not apply.

Downham Way: 430	Takeaway in sui generis use class whereby the permitted development does not apply
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Assessment of wholly unacceptable adverse impacts:

- 3.51. The proposed revised Article 4 Direction covers 17% of Downham Way Local Centre, which demonstrates a blanket approach has not been taken.
- 3.52. Downham Way plays an essential role in providing a range of shops and services that meet the day-to-day needs of residents of Downham neighbourhood, while also offering a place for to meet and socialise nearby. In such centres, the loss of an individual ground floor premises in the middle of a parade, could have significant implications for the future success of the centre. Undermining the vitality of these centres by introducing piecemeal residential units within these frontages would result in a less attractive offer for residents, forcing them to undertake unsustainable car journeys to other larger district centres such as Downham to meet their day-to-day needs.

Non-designated Parades

3.53. There are over non-designated 70 parades dispersed throughout the Borough. These provide a smaller-scale convenience retail offer to residents and communities (e.g. Corner shops). As such, they provide convenient access to a limited range of necessities within short walking distance of residents nearby. Ten parades have been outlined in the figures below. These are more than 400 metres (a 5-minute walking distance) from major, district or local centres, and are included within the Article 4 Direction. There is significant concern that the piecemeal introduction of ground-floor residential uses through permitted development could lead to the loss of these seven parades. This would have a wholly unacceptable impact on local residents, specifically for further isolating vulnerable or elderly residents who may depend on them to meet some day-to-day necessities as they are not within a short walking distance to other major, district or local centres.

Figure 27: Map showing Article 4 Direction area for Burnt Ash Hill: 246 to 242

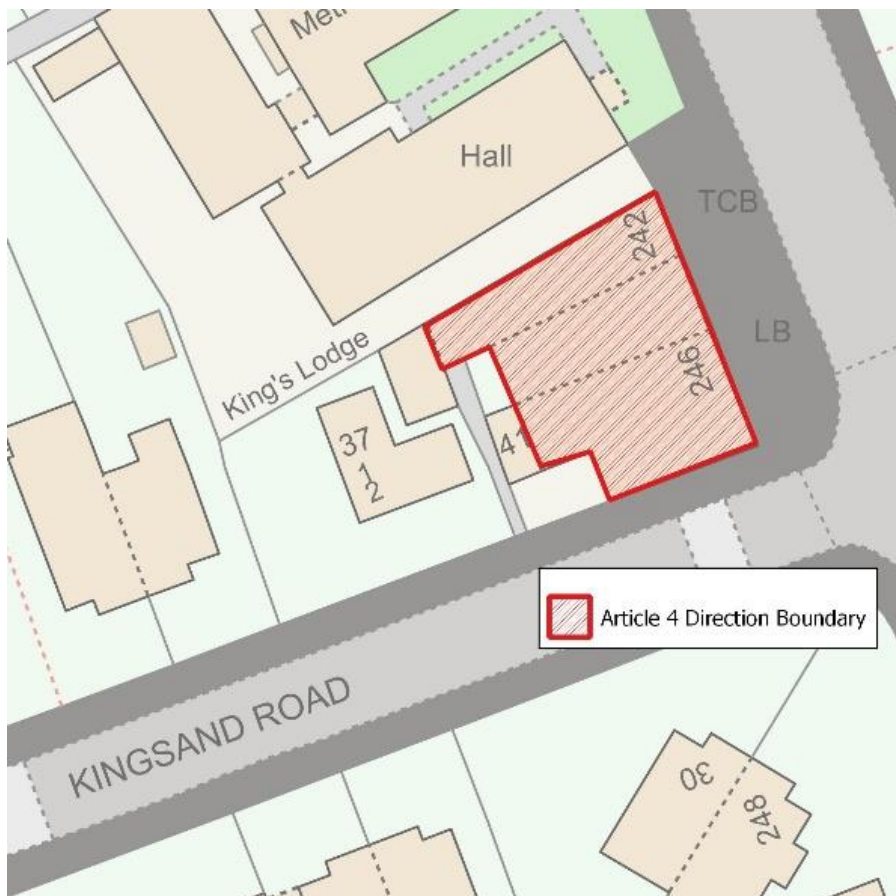


Figure 30: Map showing proposed Article 4 Direction area for Chinbrook Road: 101 to 11 and Marvels Lane: 127 to 133



Figure 28: Map showing proposed Article 4 Direction coverage St Georges Parade, Perry Hill: 1 to 6 and Perry Hill: 8 to 4



Figure 31: Map showing proposed Article 4 Direction area for Perry Vale: 191 to 197 and 174 182

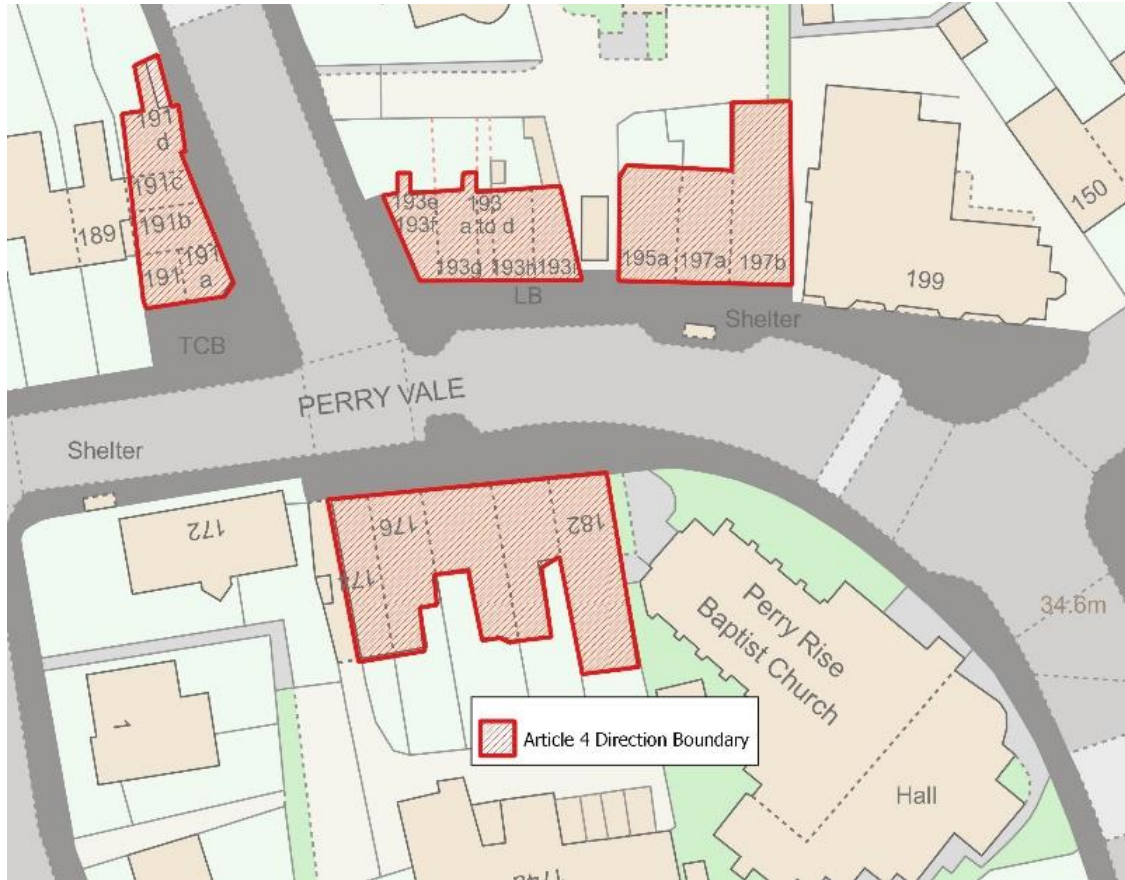


Figure 32: Map showing proposed Article 4 Direction area for Evelyn Street: 18 to 24

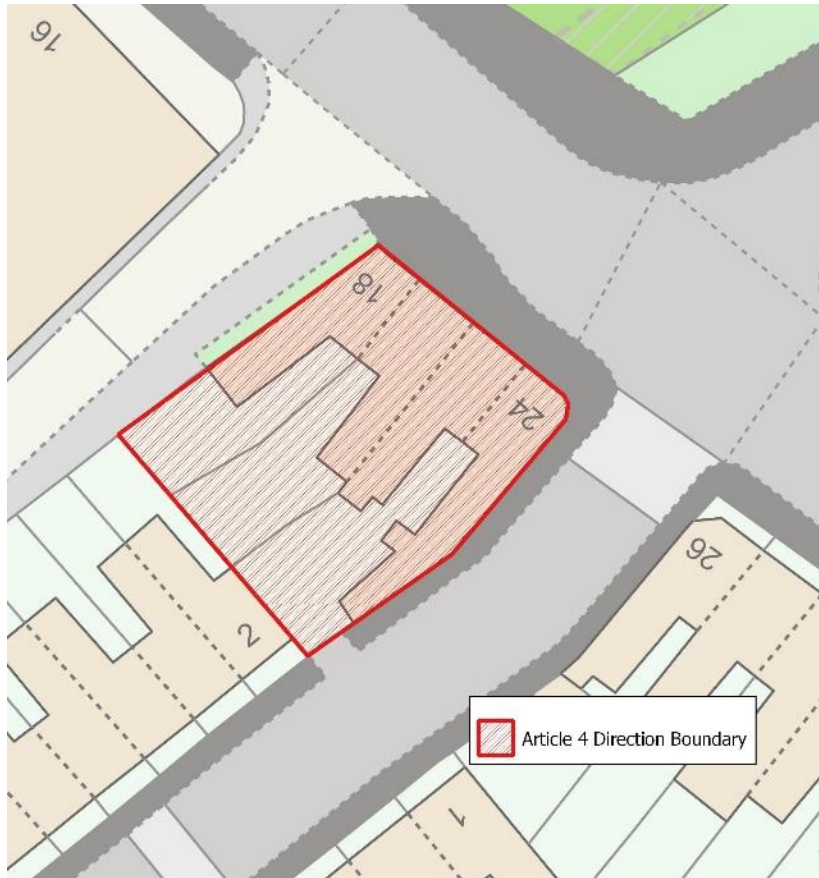


Figure 33: Map showing proposed Article 4 Direction area for Southend Lane: 291 to 305

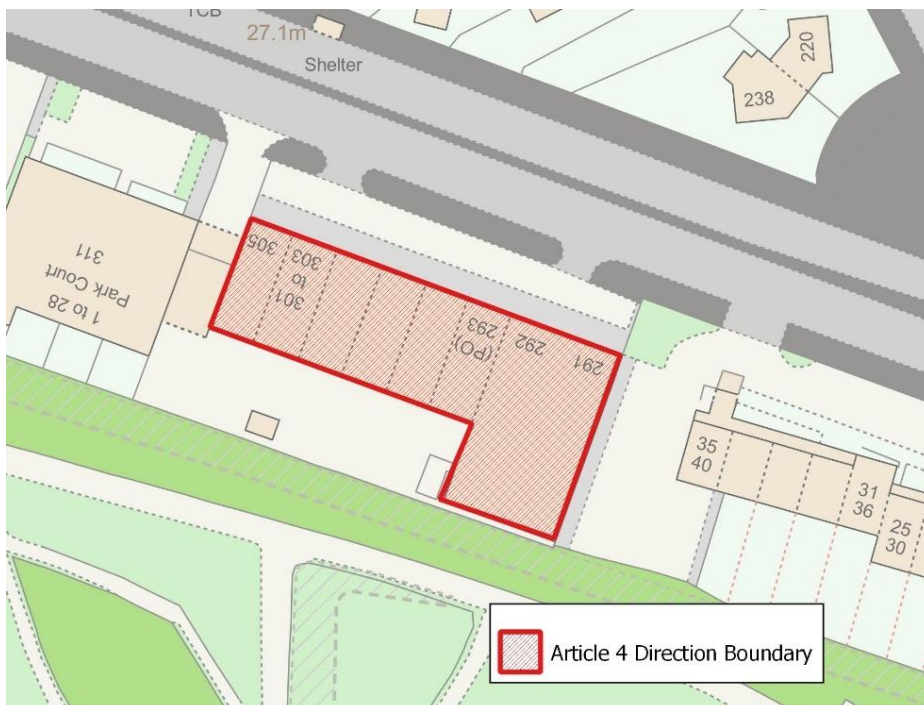


Figure 35: Map showing proposed Article 4 Direction area for Verdant Lane: 96 to 36

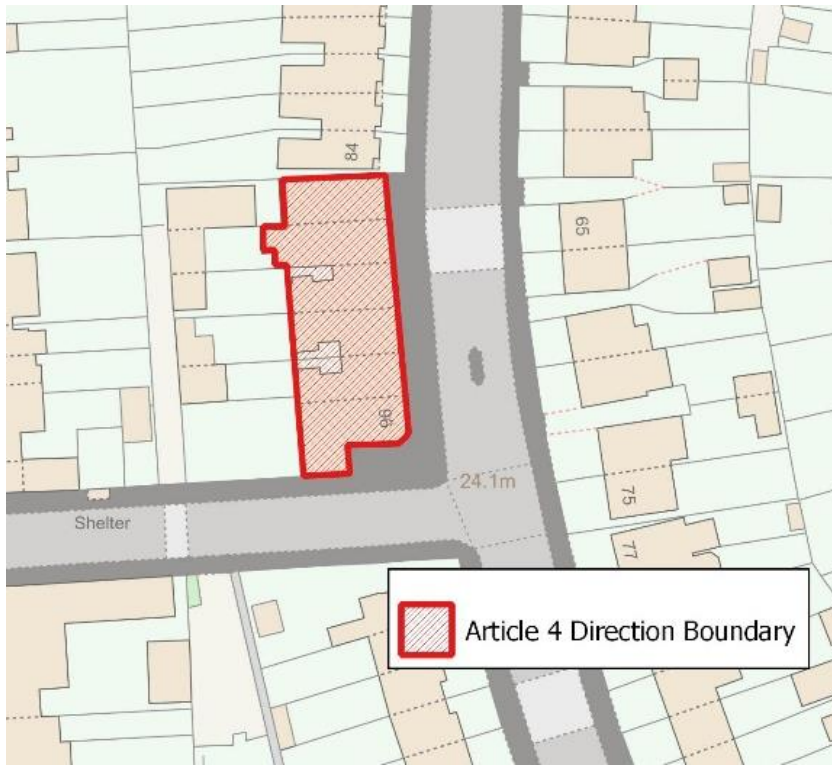


Figure 34: Map showing proposed Article 4 Direction area for Stanstead Road: 295 to 317 and 325 to 341



Figure 36: Map showing proposed Article 4 Direction area for Brockley Rise: 1 to 25 and Stanstead Road: 195 to 199

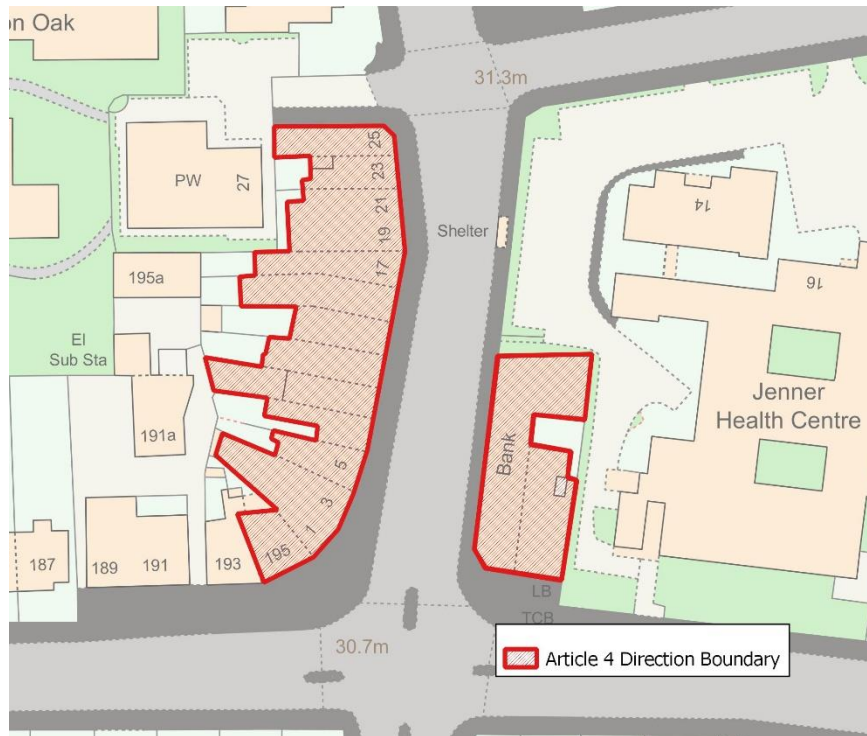
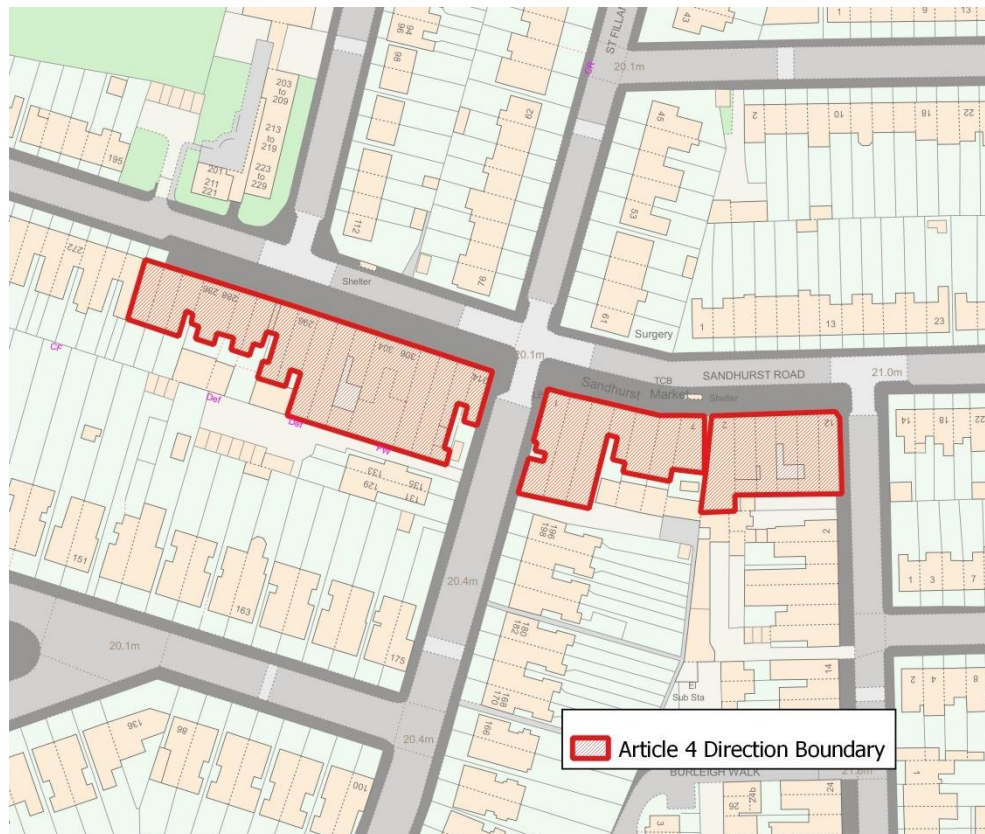


Figure 37: Map showing proposed Article 4 Direction area for Sangley Road: 314 to 280 and Sandhurst Road: 1 to 18



4. Mixed-use employment locations (MEL)

Table 24: Description of boundary changes of MELs following a review of ground floor use masterplans.

Name	Boundary change description
Plough Way	In line with the ground floor masterplans associated with planning applications for Yeoman Street, Cannon Wharf, Marine Wharf East and Marine Wharf West, remove solely residential blocks, Earl Pump and proposed strategic open spaces including Surrey Canal Linear Park and Rainsborough Avenue Embankments.
Convoys Wharf	In line with the ground floor masterplan, remove the protected wharf from the Article 4 Direction Area but retain the rest of the site where employment and retail floor space are dispersed throughout.
Surrey Canal	In line with the ground floor master plan, remove Millwall Football Stadium and associated uses from the Article 4 Direction Boundary applied.
Arklow Road	In line with the ground floor masterplan, remove the northern section of the MEL where solely residential will be located and the most southern point where a church is located.
Grinstead Road	In line with ground floor master plan remove eastern section site where solely residential will be located
Oxestalls Road	Retain MEL boundary as ground floor master plan demonstrates employment floorspace is dispersed throughout the site. Furthermore, Scott House, Grove Street - located at north-eastern corner - has planning permission granted for a building consisting of 137 residential dwellings and 824sqm employment floor space.
Sun and Kent Wharf	Retain MEL boundary as ground floor master plan demonstrates employment floorspace is dispersed throughout the site.
Childers Street East	Retain 28 to 48 Childers Street but exclude 81 Childers Street (a public house).

Figure 38: Map showing proposed revised Article 4 Direction area for Plough Way Mixed Use Employment Location

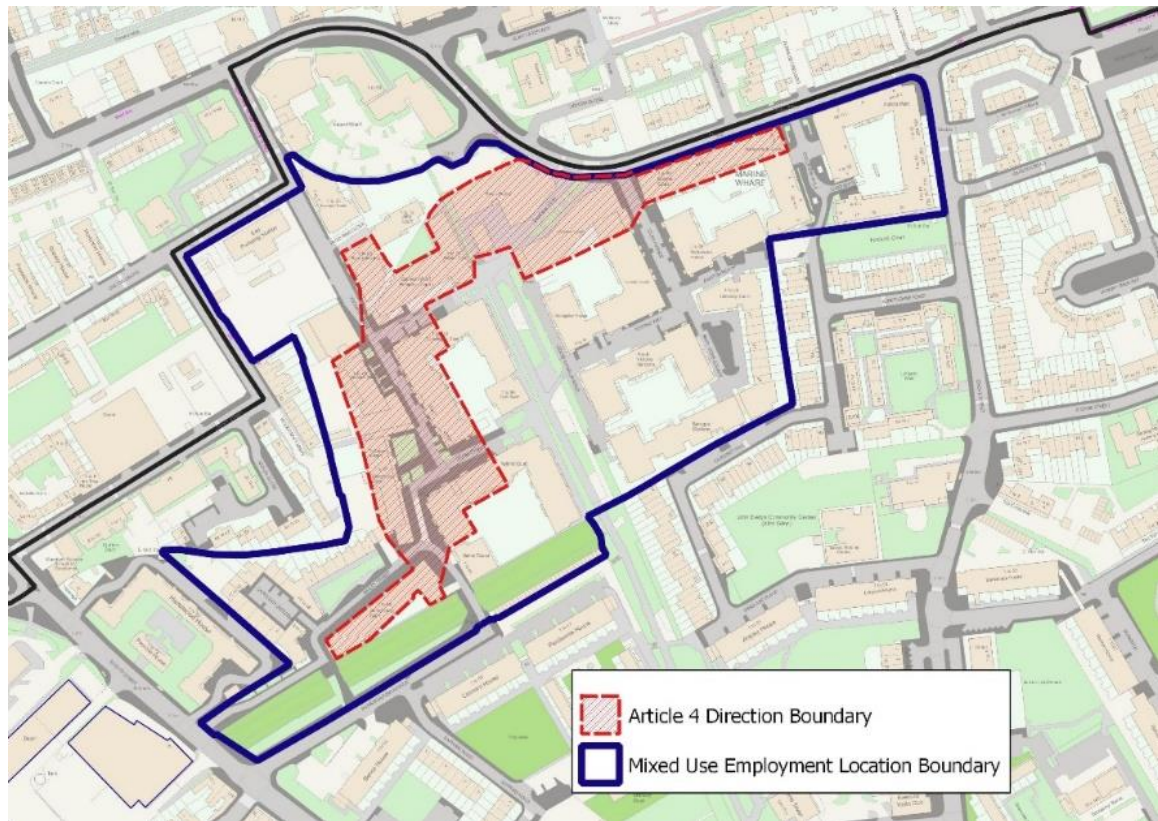
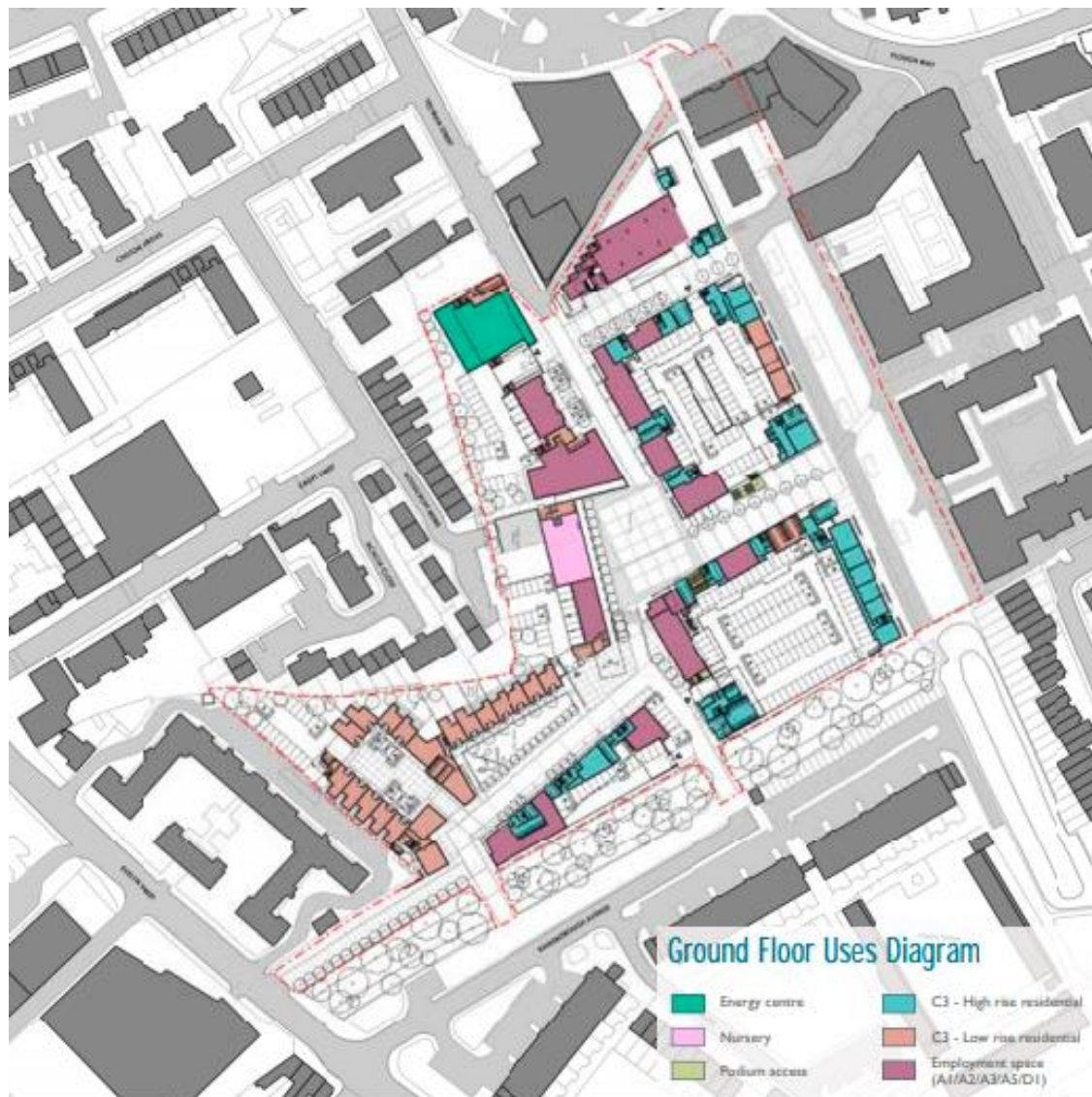


Figure 39: Diagram showing ground floor uses for Marine Wharf East (eastern area of Plough Way MEL)



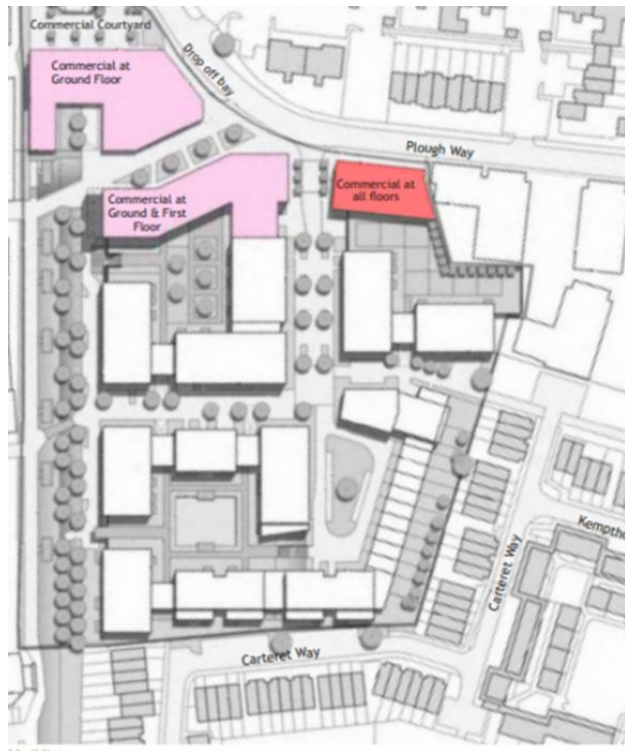
Note: commercial uses indicated as orange on the diagram

Figure 40: Diagram showing ground floor uses for Cannon Wharf (central area of Plough Way MEL)



Note: Class E uses indicated as pink and dark pink on the diagram

Figure 41: Diagram showing ground floor uses for Marine Wharf West (inner eastern area of Plough Way MEL)



Note: commercial floor space indicated as pink and red.

Figure 42: Diagram showing ground floor commercial unit for 19 Yeoman Street (located at the northern point of Plough Way)



Note: Commercial unit outlined in pink

Figure 43: Map showing proposed revised Article 4 Direction area for Convoys Wharf MEL.

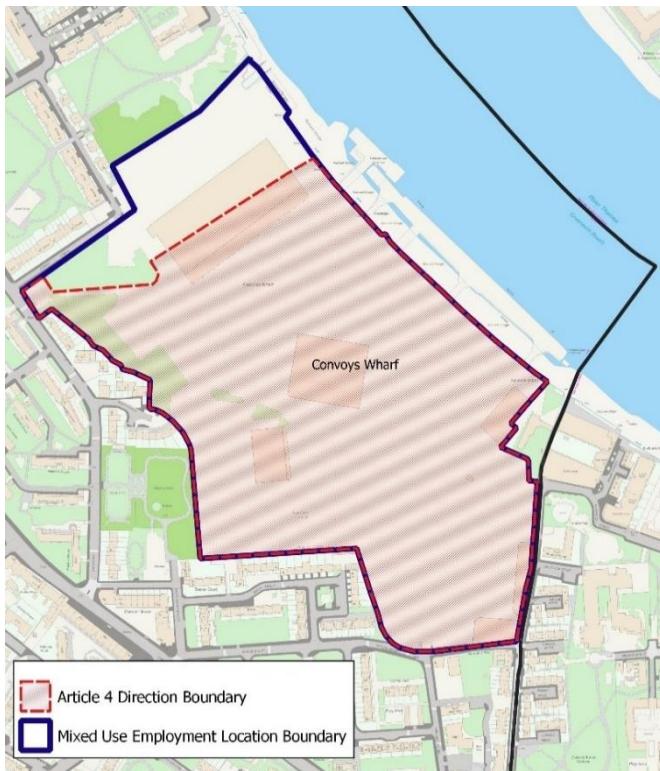


Figure 44: Diagram showing ground floor uses for Convoys Wharf.

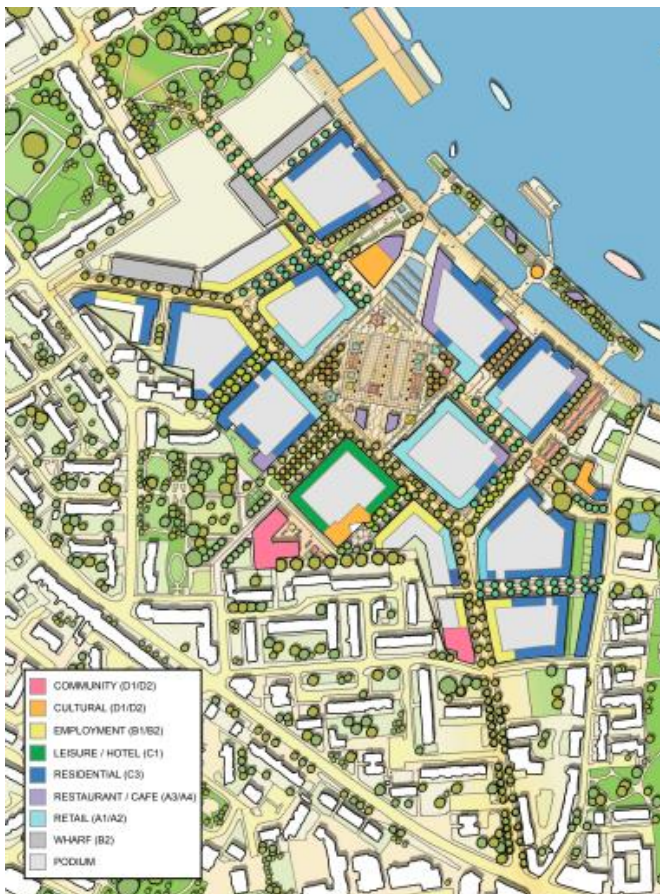


Figure 45: Diagram showing proposed revised Article 4 Direction area for Surrey Canal MEL

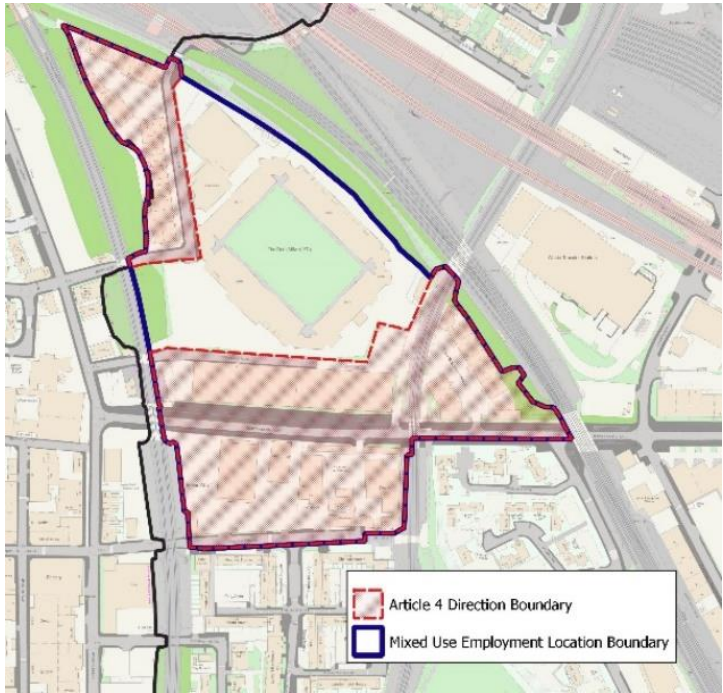
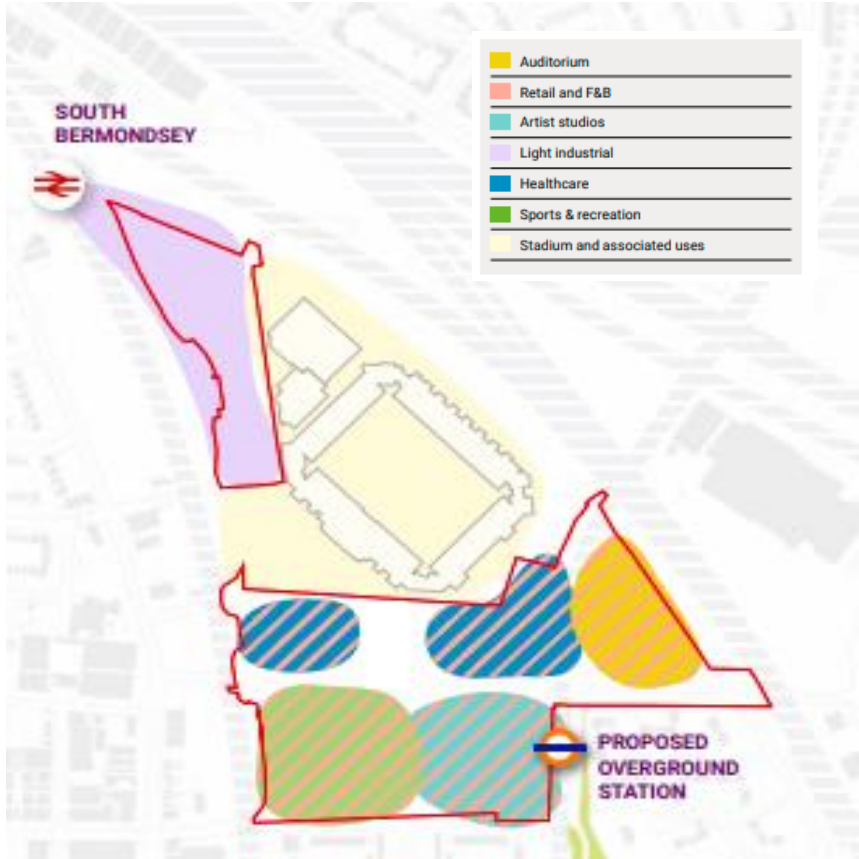


Figure 46: Diagram showing proposed ground floor uses for Surrey Canal MEL



Note: commercial floorspace indicated as yellow

Figure 43: Map showing proposed revised Article 4 Direction area for Arklow Road MEL.

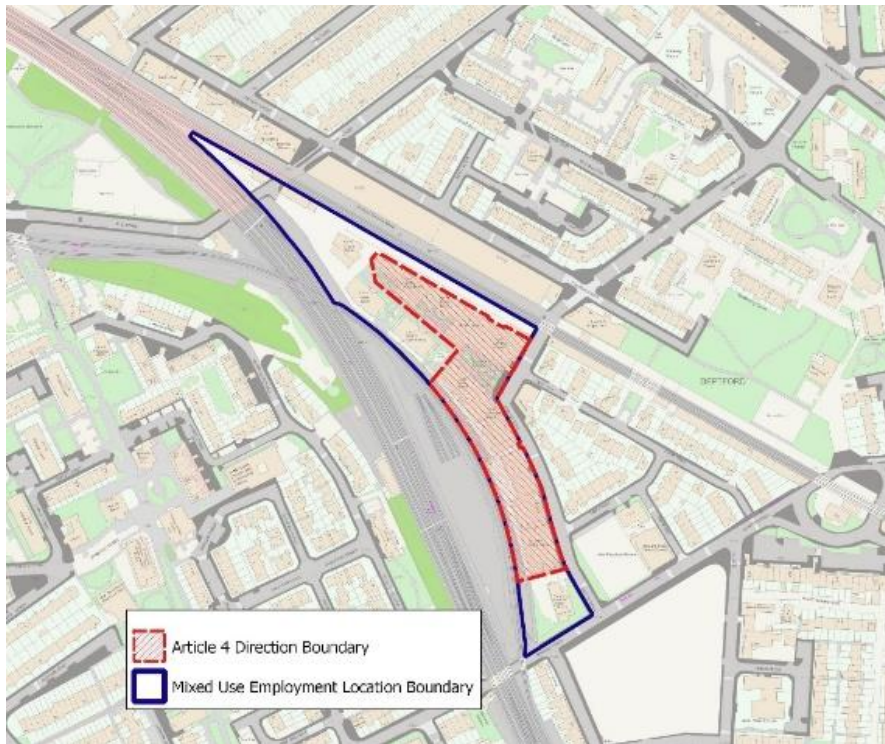


Figure 44: Diagram showing ground floor uses plan Arklow Road



Note: commercial floor space indicated as yellow

Figure 47: Map showing proposed revised Article 4 Direction area Boundary for Grinstead Road MEL boundary.

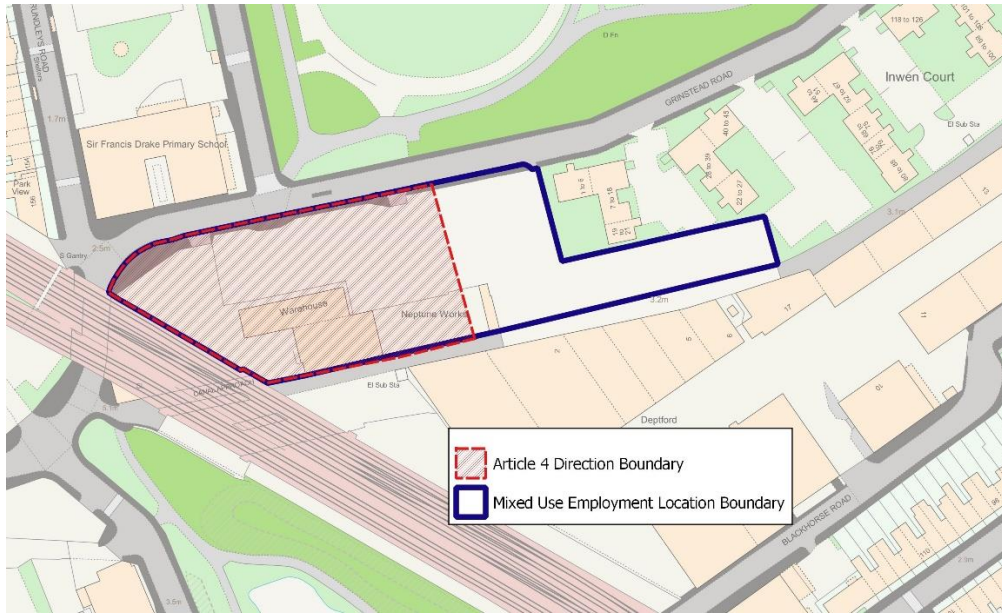
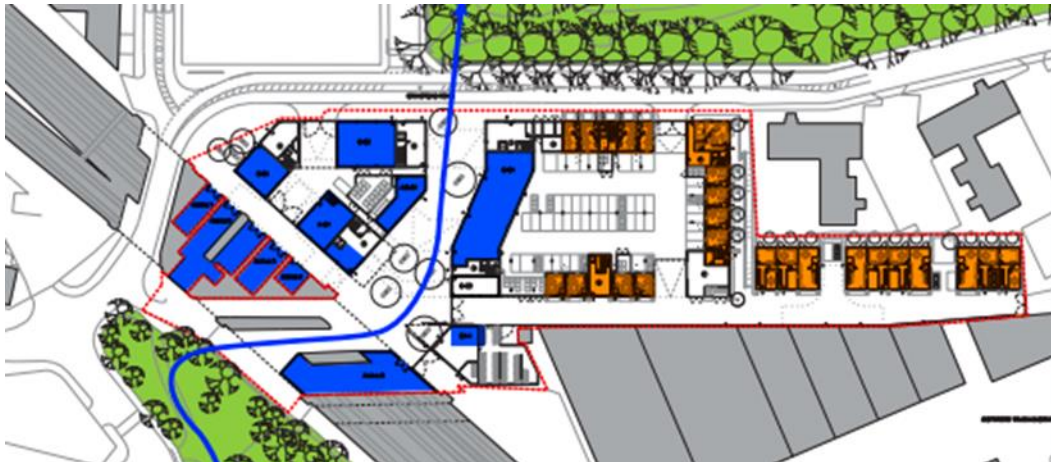


Figure 48: Diagram showing proposed ground floor uses plan for Neptunes Wharf



Note: Commercial floorspace indicated as blue

Figure 49: Map showing proposed Article 4 Direction area for Oxestalls Road MEL.

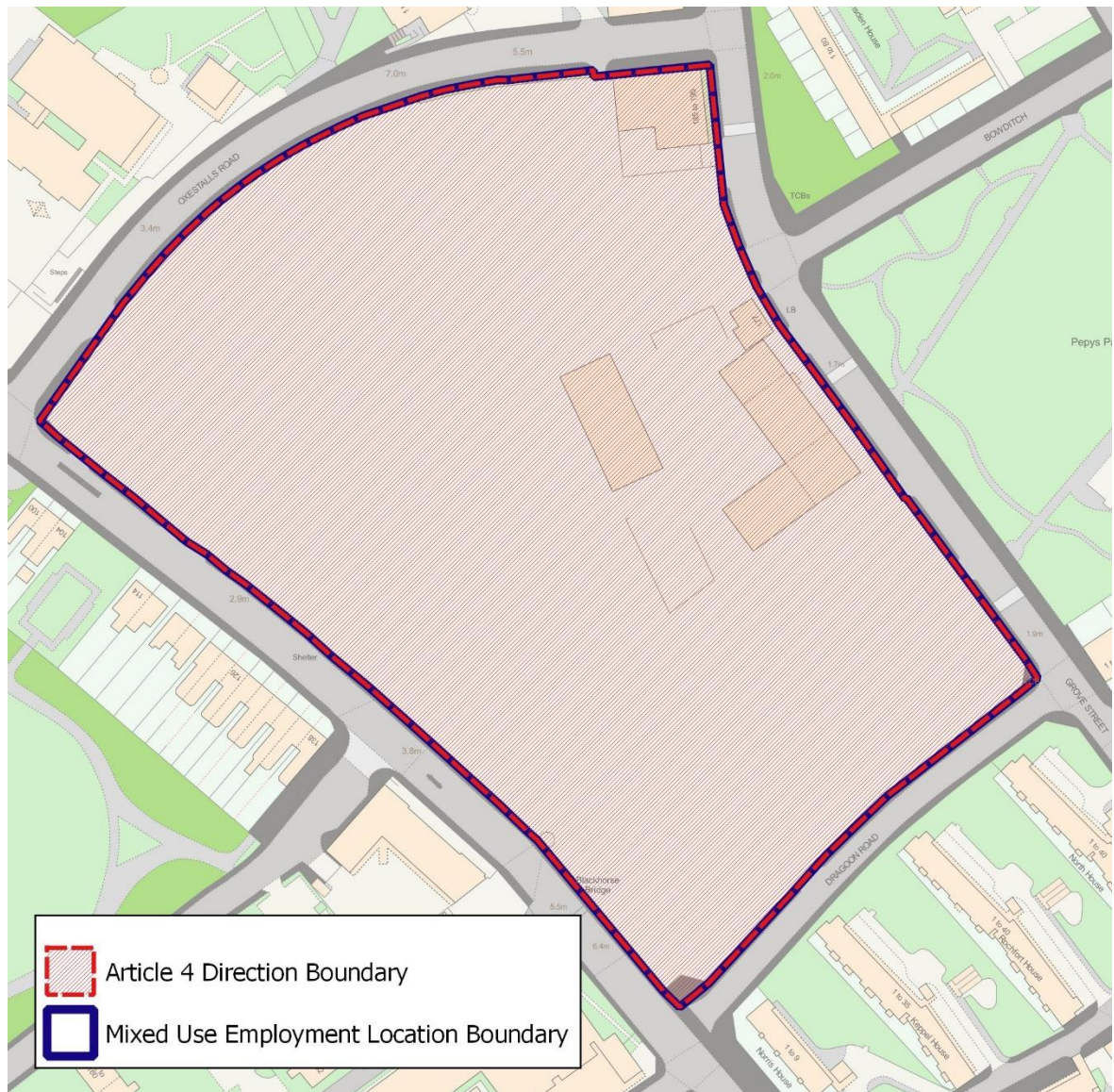


Figure 50: Diagram showing proposed ground floor use masterplan for Oxstalls Road



Figure 51: Map showing proposed Article 4 Direction area for Sun and Kent Wharf MEL.

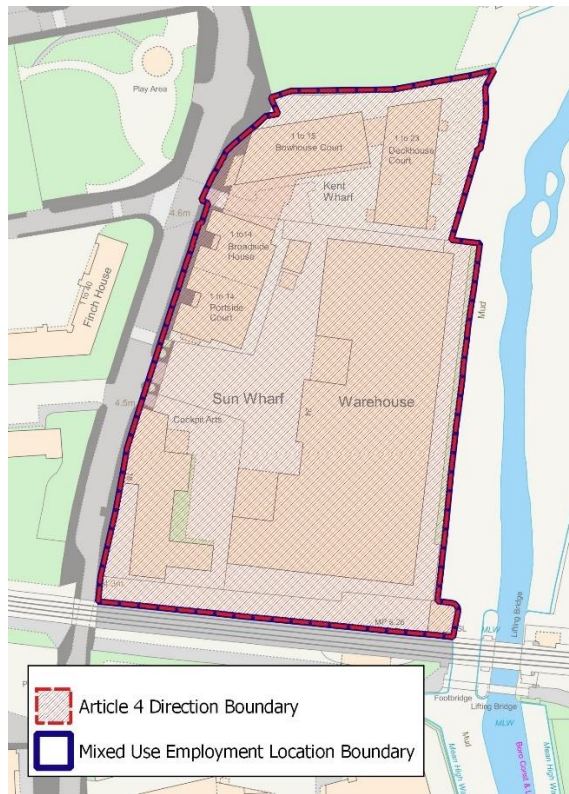


Figure 52: Diagram showing ground floor masterplan for Sun and Kent Wharf



Figure 53: Map showing proposed revised Article 4 area for Thanet Wharf.

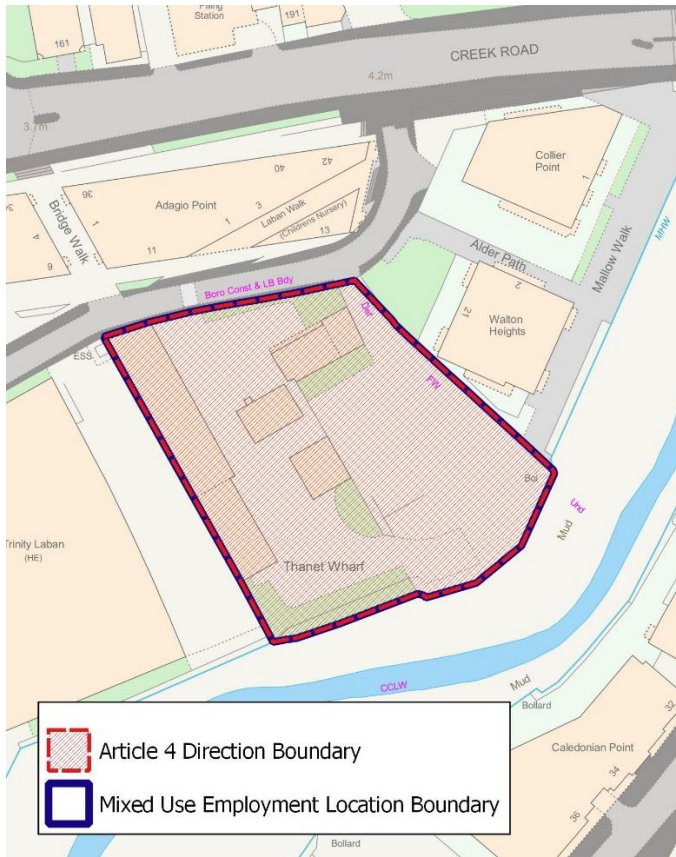
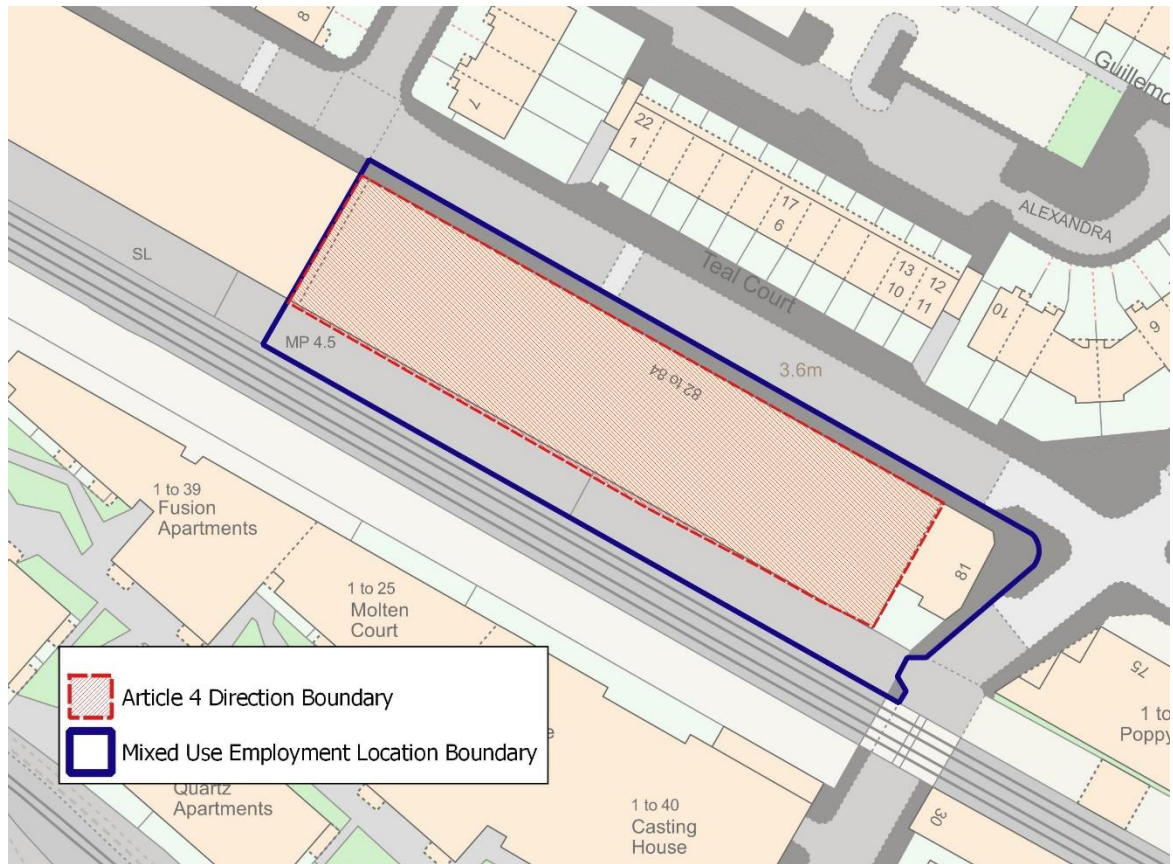


Figure 54: Diagram showing proposed ground floor masterplan for Thanet Wharf.



Figure 55: Map showing proposed revised Article 4 Direction area for Childers Street East MEL



5. Strategic Industrial Locations

Surrey Canal Road SIL

Figure 56: Map of proposed revised Article 4 Direction boundary for Surrey Canal Road SIL

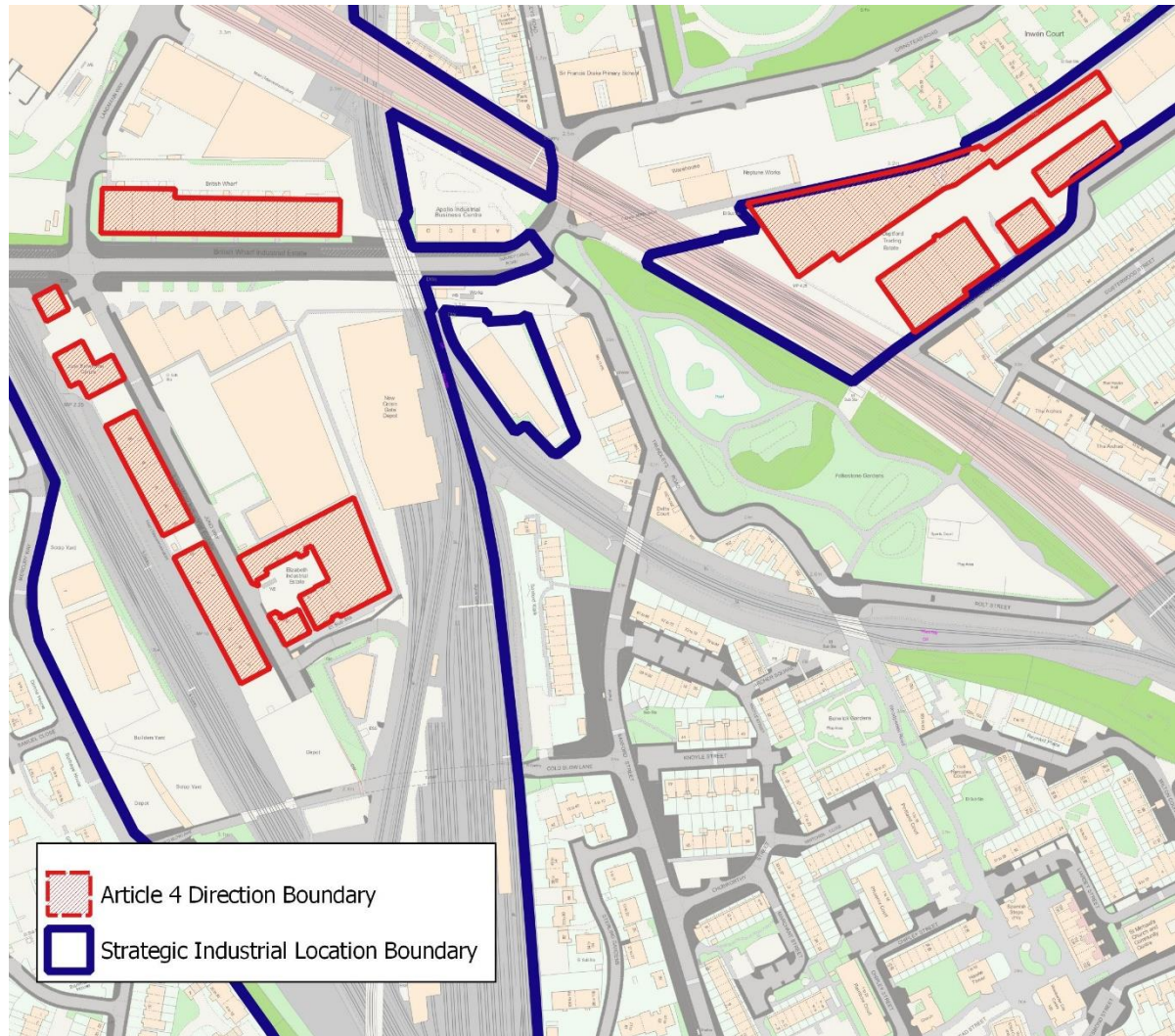


Table 25: Justification for the inclusion or exclusion of areas within Surrey Canal Road SIL within the Article 4 Direction area applied.

Area	Justification
Include	
British Wharf: Units 1 to 10	Light industrial units that contain ancillary office space which have elements necessary for habitation, including windows to allow natural daylight inside.
Juno Enterprise Centre	Multi storey light industrial/workshop building which contains elements necessary for habitation, including windows to allow natural daylight inside.

Unit D, Juno Way	Café which contains elements necessary for habitation, including windows to allow natural daylight inside.
Juno Way Industrial Estate	Light Industrial units that contain ancillary office space which have elements necessary for habitation, including windows to allow natural daylight inside.
Elizabeth Industrial Estate	Office space mixed with light industrial units that contain elements necessary for habitation, including windows to allow natural daylight inside.
Deptford Trading Estate (East)	Light Industrial units that contain ancillary office space which have elements necessary for habitation, including windows to allow natural daylight inside.
Exclude	
Open Railway Land	Permitted development would not apply.
South East London Combined Heat and Power	Waster transfer station - including an incinerator - in sui-generis use and therefore the permitted development would not apply.
Landmann Way Reuse and Recycling Centre	Scrap yard in sui-generis use and therefore the permitted development would not apply.
Land west of Juno Way	Scrap yard in sui-generis use and therefore the permitted development would not apply.
New Cross Gate Depot	Sui-generis use and therefore the permitted development would not apply.
Land east of New Gate Depot	Industrial units which contain no elements necessary for habitation, such as windows to allow natural daylight inside.
Trade Park, Surrey Canal Road	Typology is comprised of retail warehouse units which does not lend itself to residential conversion.
The Tea Shed, Unit 6, Juno Way	Large B8 storage and distribution unit which contains no elements necessary for habitation, such as windows to allow natural daylight inside.

Assessment of wholly unacceptable impacts

- 5.1. The proposed Article 4 Direction area covers 7% of Surrey Canal Road SIL which demonstrates a blanket approach has not been taken.
- 5.2. The introduction of residential uses to this industrial location (that is recognised for its wider strategic importance) could compromise the long-term sustainability for retaining businesses or growing them in the future, therefore compromising the local economy.

Bromley Road SIL

Figure 57: Map of proposed revised Article 4 Direction boundary for Bromley Road SIL

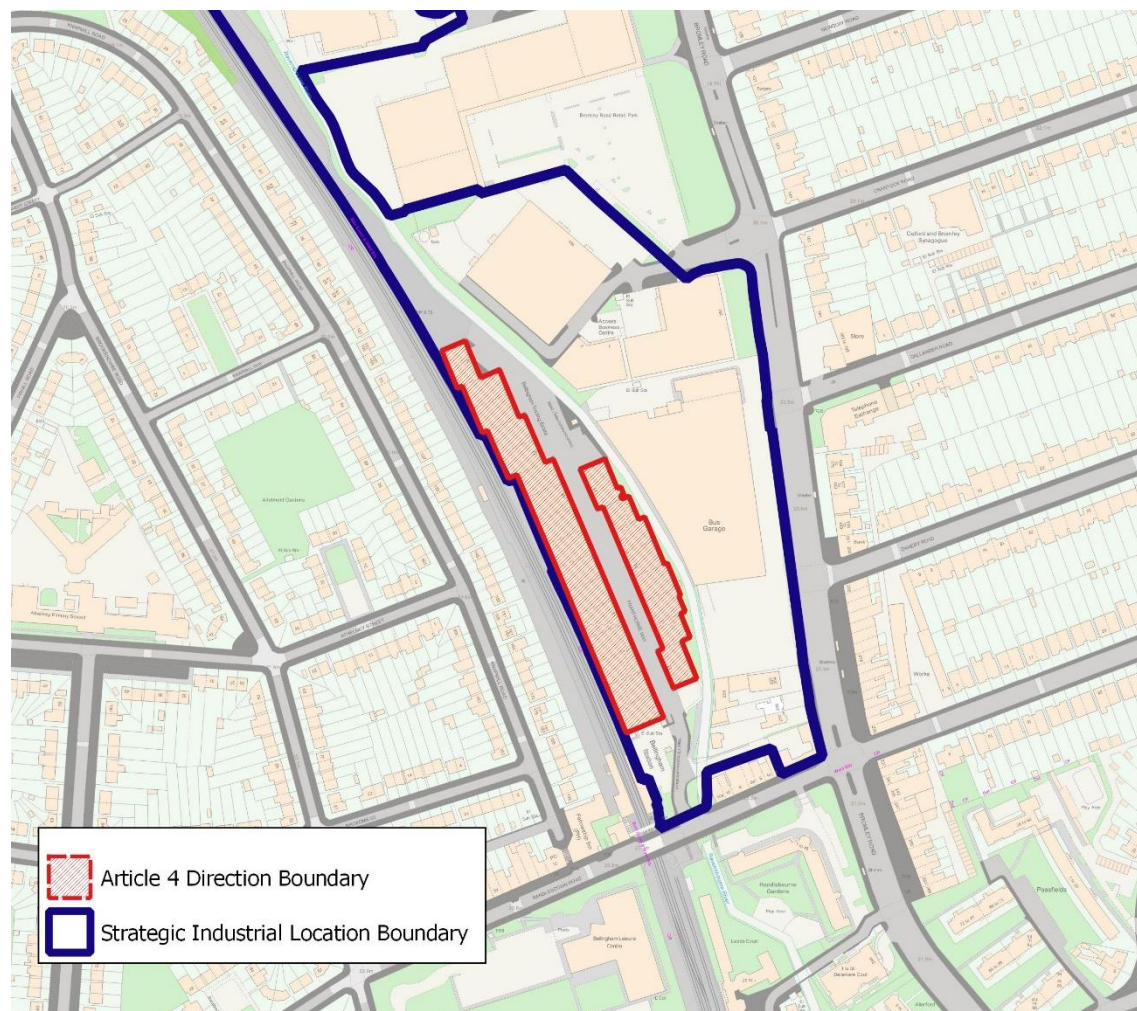


Table 25: Justification for the inclusion or exclusion of areas within Bromley Road SIL within the revised Article 4 Direction area proposed.

Area	Justification
	Include
Bellingham Trading Estate: Units 1 to 24	Light Industrial units that contain ancillary office space which have elements necessary for habitation, including windows to allow natural daylight inside.
	Exclude
Bromley Road: 202 to 206	MOT centre in sui generis use class and therefore the permitted development would not apply.
Bromley Road: 208 to 210	Hand car wash in sui generis use class and therefore the permitted development would not apply.

Land southeast of 210 Bromley Road	Open air storage in B8 use class and therefore the permitted development would not apply.
Catford Bus Garage	Sui generis use class and therefore the permitted development would not apply.
Bromley Road: 2, Access Business Centre	Typology is comprised of a retail warehouse unit which does not lend itself to residential conversion.
Bromley Road: 160, unit 1	MOT centre in sui generis use class and therefore the permitted development would not apply.
Bromley Road: 160, Selco Builders Warehouse	Retail Warehouse Club in sui-generis use class and therefore the permitted development would not apply.
Bromley Road: 160, Access Self Storage Catford	B8 Storage and Distribution unit and therefore the permitted development would not apply.
Metropolitan Police Southeast Traffic Unit	Police Garage in sui generis use and therefore the permitted development would not apply.
Bromley Road: 27	Retail warehouse club in sui generis use and therefore the permitted development would not apply.

Assessment of wholly unacceptable impacts

- 5.3. The proposed Article 4 Direction area covers 10% of Bromley Road SIL which demonstrates a blanket approach has not been taken.
- 5.4. The introduction of residential uses to this industrial location (that is recognised for its wider London strategic importance) could compromise the long-term sustainability for retaining businesses or growing them in the future, therefore compromising the local economy.

6. Locally Significant Industrial Sites (LSIS)

Co-location sites

- 6.1. Policy EC6.D of the Regulation 19 Lewisham Local Plan Proposed Submission Version, identifies 12 LSIS where the co-location of employment and other compatible uses will be permitted to secure their long-term viability and to help facilitate their renewal and regeneration. The following LSIS this relates to include Apollo Business Centre, Blackheath Hill, Childers Street West, Clyde Vale, Evelyn Court, Lower Creekside, Perry Vale, Stanton Square, Trundleys Road, Willow Way, Worsley Bridge Road.
- 6.2. Site allocation policies have been prepared for these 12 sites to ensure that co-location is coordinated and appropriately managed through the masterplan process, particularly to ensure that the function of the LSIS is not eroded by piecemeal development. Therefore, it is proposed that the existing boundaries are retained for purposes of the Article 4 Direction area applied for co-location sites on the selected LSIS.
- 6.3. Without an Article 4 Direction boundary covering the entire LSIS sites, there is risk that piecemeal residential conversion over the long term could compromise their sustainability for retaining businesses or growing them in the future, therefore compromising the local economy.

Other LSIS

- 6.4. For the remaining six LSIS which are not identified for co-location, a desktop review using google earth to identify Class E use to be retained within the revised boundaries that are either in office, light industrial or other Class E uses and have been assessed as to whether they contain elements necessary for habitation, including windows to allow natural daylight inside.

Bermondsey Dive Under LSIS

Figure 58: Map showing Bermondsey Dive Under LSIS with no Article 4 Direction coverage proposed.

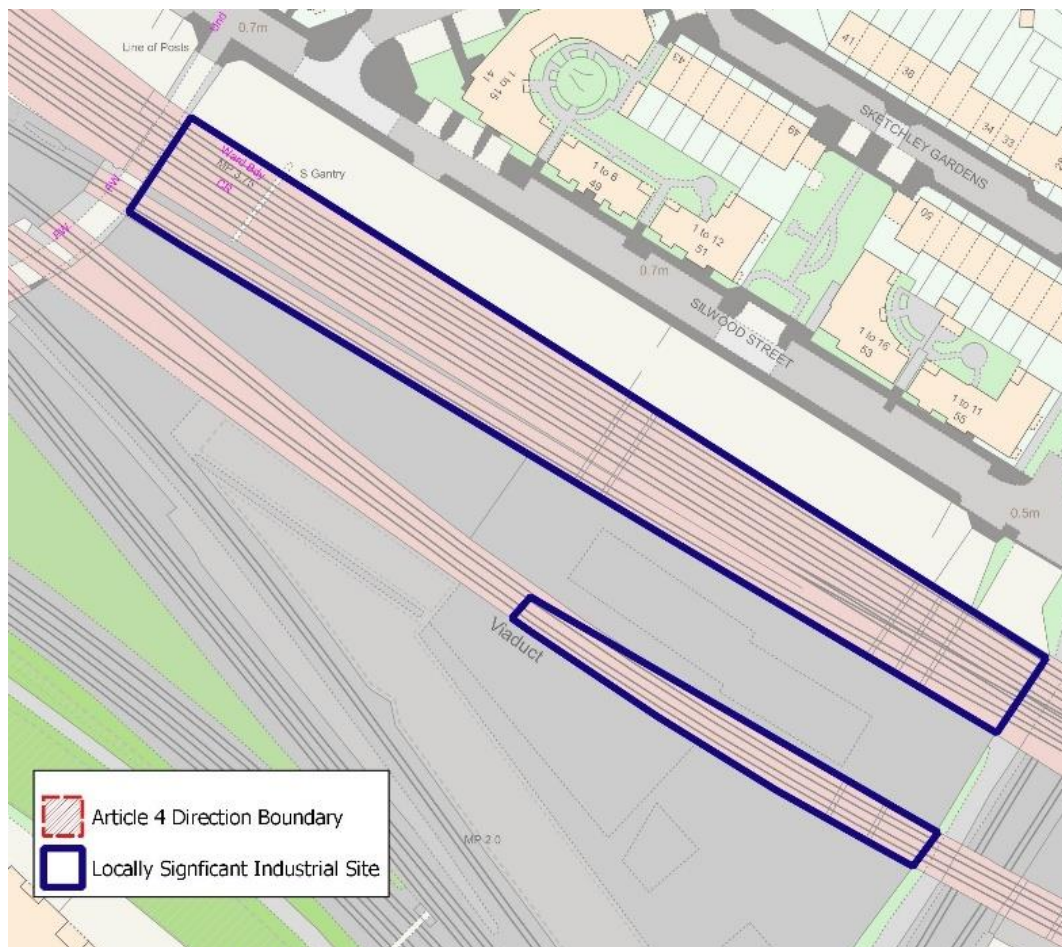


Table 26: Justification for the exclusion of areas within Bermondsey Dive Under LSIS within the Article 4 Direction area applied.

Area	Justification
	Exclude
All	Consist of railway arch units which does not lend itself to residential conversion.

Evelyn Street LSIS

Figure 59: Map showing Evelyn Street LSIS with no Article 4 Direction area proposed.

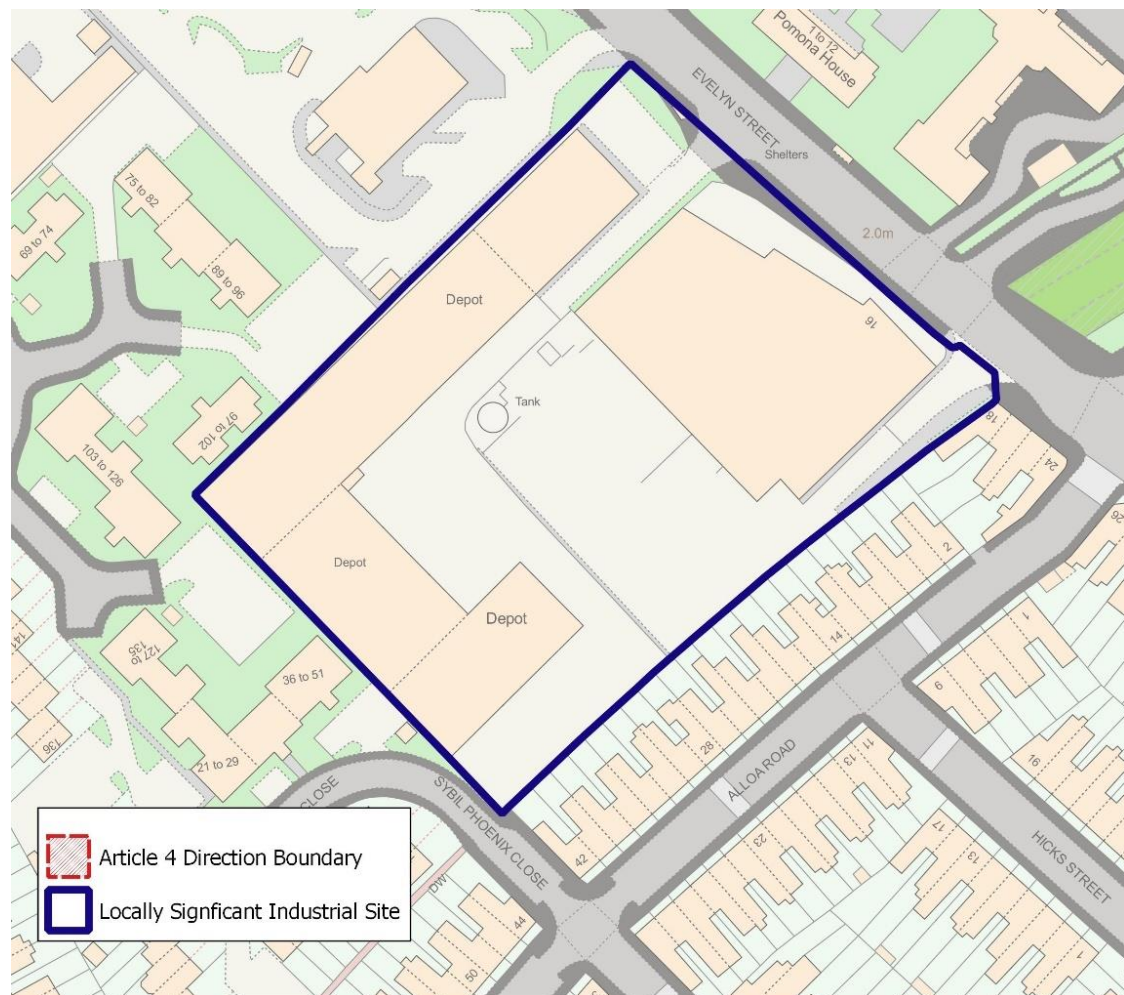


Table 25: Justification for the exclusion of areas within Evelyn Street LSIS within the Article 4 Direction area applied.

Area	Justification Exclude
Evelyn Street: 16	Typology comprised of retail warehouses which does not lend itself to residential conversion.
Remainder of the site	B8 Storage and Distribution units and therefore the permitted development would not apply.

Manor Lane LSIS

Figure 60: Map showing Manor Lane LSIS with no Article 4 Direction coverage proposed.

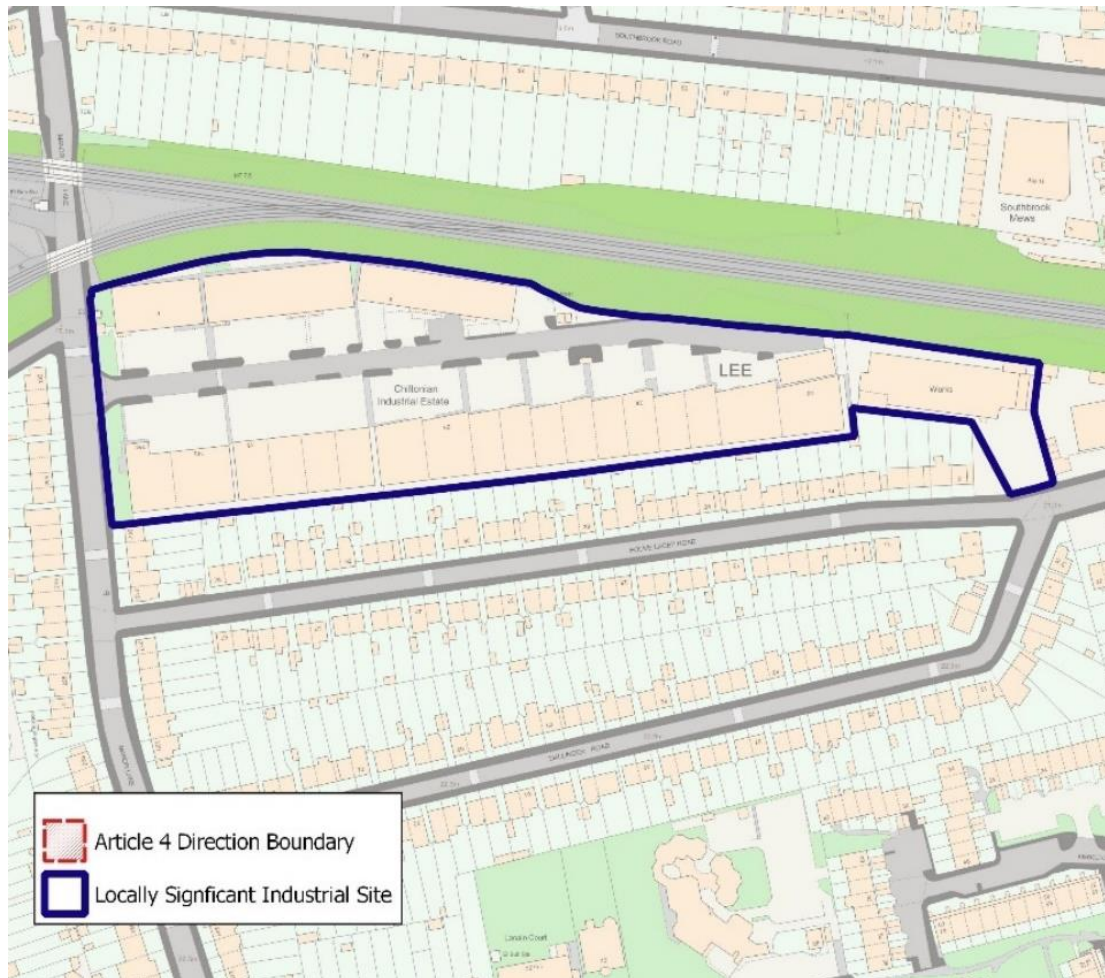


Table 27: Justification for the exclusion of areas within Manor Lane LSIS within the Article 4 Direction area applied.

Area	Justification
Chiltonian Industrial Estate and Travis Perkins	<p>Exclude</p> <p>B2 General Industrial Units and therefore the permitted development would not apply. Furthermore, units contain no elements necessary for habitation, such as windows to allow natural daylight inside.</p>

Lewisham Way LSIS

Figure 62: Map showing Lewisham Way LSIS with no Article 4 Direction coverage proposed.

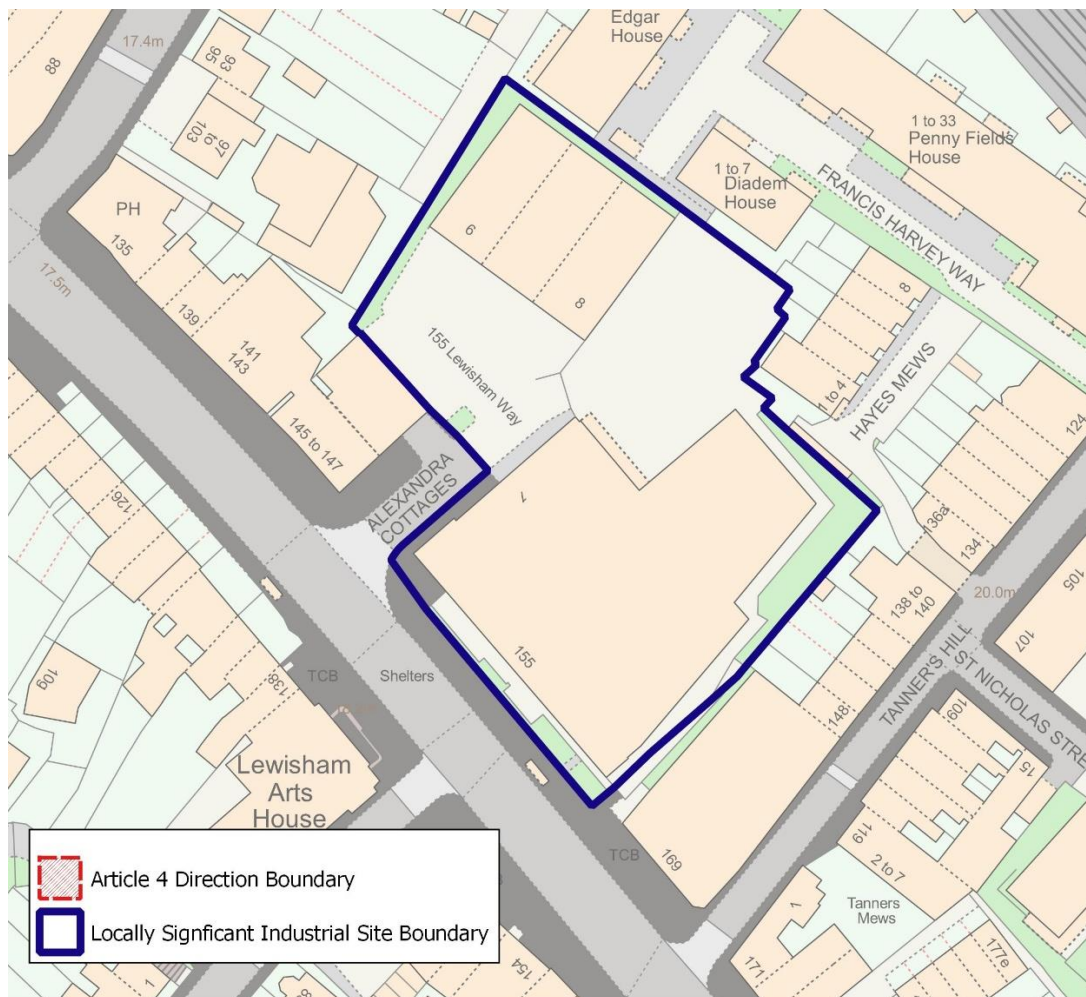


Table 29: Justification for excluding areas across Lewisham Way LSIS within the Article 4 Direction area proposed.

Area	Justification Exclude
Lewisham Way: 155	B8 Storage and Distribution unit and therefore the permitted development would not apply.
Lewisham Way: 155, Unit 6 to 8	Industrial units which contain no elements necessary for habitation such as windows to allow natural for daylight inside.

Endwell Road LSIS

Figure 63: Map showing proposed revised Article 4 Direction area for Endwell Road LSIS.

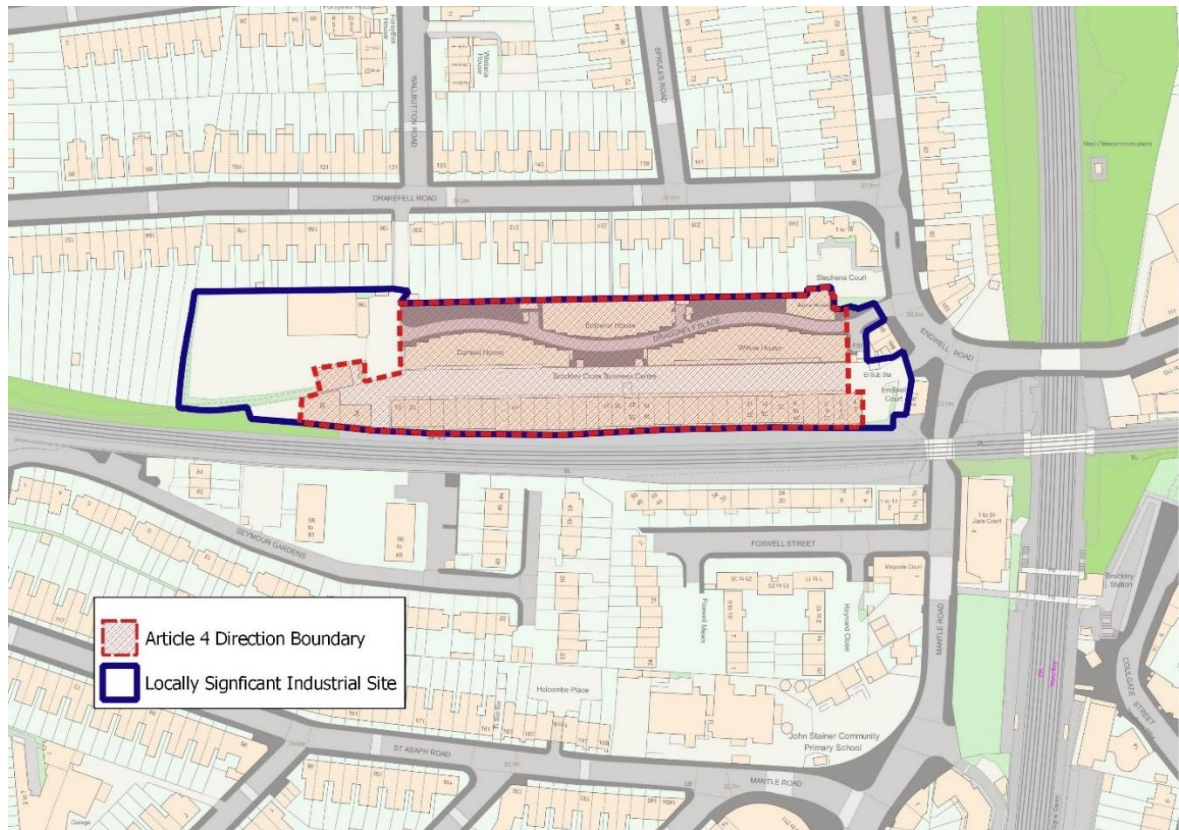


Table 29: Justification for including and excluding areas across Endwell Road LSIS within the Article 4 Direction area proposed.

Area	Justification
Include	
Dragonfly Place	Live work units with ground floor office space which contain elements necessary for habitation, including windows to allow natural daylight inside.
Brockley Cross Business Centre	Light industrial units and office space which have elements necessary for habitation, including windows to allow natural daylight inside.
Exclude	
Land east of Dragonfly Place	B8 Storage and Distribution unit and therefore the permitted development would not apply. Furthermore, the unit contain no elements necessary for habitation, such as windows to allow natural daylight inside.

Assessment of wholly unacceptable adverse impacts

- 6.5. The proposed Article 4 Direction covers 72% of Endwell Road LSIS, which demonstrates a blanket approach has not been applied.
- 6.6. Without an Article 4 Direction, the introduction of residential uses to this location could compromise the long-term sustainability for retaining businesses or growing them in the future, therefore compromising the local economy.

Malham Road LSIS

Figure 64: Map showing proposed revised Article 4 Direction area for Malham Road LSIS.



Table 30: Justification for including and excluding areas across Malham Road LSIS within the Article 4 Direction area proposed.

Area	Justification
Include	
Stanstead Road: 97 to 105	Vacant garden centre which contains elements necessary for habitation, including windows to allow natural daylight inside.
Stanstead Road: 107 to 113	Retail and office space which contains elements necessary for habitation, including windows to allow natural daylight inside.
Malham Road: 65 to 77	Well performing parade of shops with one vacant unit.
Stanstead Road: 127 to 147	Well performing parade of shops with one vacant unit.
Malham Road: Dulwich Business Centre, 1 to 5	Industrial units with ancillary office space which contain elements necessary for

	habitation, including windows to allow natural daylight inside.
Malham Road: 27 to 33	Light industrial units which contain elements necessary for habitation, including windows to allow natural daylight inside.
Malham Road: 72 and Dalmain Road: 62 to 68	Office space which contains elements necessary for habitation, including windows to allow natural daylight inside.
Stanstead Road: Kemble House Stanstead Road: 118	Light industrial units which contain elements necessary for habitation, such as windows to allow for natural daylight inside.
Stanstead Road: 120	Active class E unit; a massage parlour. Unit contains elements necessary for habitation such as windows to allow for natural daylight inside.
Exclude	
Stanstead Road: 119 to 121	Large B8 Storage and Distribution unit and therefore the permitted development does not apply.
Stanstead Road: Forest Hill Methodist Church	Church in sui generis use class and therefore the permitted development does not apply.
Wastedale Road: 1 to 45	Residential
Malham Road: 2	Residential
Depot east of 97 to 105	Two B8 Storage and Distribution units and therefore the permitted development does not apply.
Malham Road: 51 to 63	B8 Storage and Distribution unit and therefore the permitted development does not apply.
Malham Road: Dulwich Business Centre, 6 to 7	MOT Centre in sui-generis use class and therefore the permitted development does not apply.
Malham Road: Connaught Business Centre, 1c to 5c Malham Road Industrial Estate	Industrial units which do not contain elements necessary for habitation, such as windows for natural sunlight.
Malham Road: Connaught Business Centre, B1 to B5	Vehicle repair centre in sui generis use class and therefore the permitted development would not apply.
Dalmain Road: 42 to 56	Industrial unit which does not contain elements necessary for habitation such as windows for natural sunlight.
Stanstead Road: 114 to 116	Residential.

Assessment of wholly unacceptable adverse impacts

- 6.7. The revised proposed Article 4 Direction covers 25% of Malham Road LSIS, which demonstrates a blanket approach has not been applied.
- 6.8. Without an Article 4 Direction, the introduction of residential uses to this location could compromise the long-term sustainability for retaining businesses or growing them in the future, therefore compromising the local economy.

Childers Street West LSIS

Figure 65: Map of proposed revised Article 4 Direction area for Childers Street West.

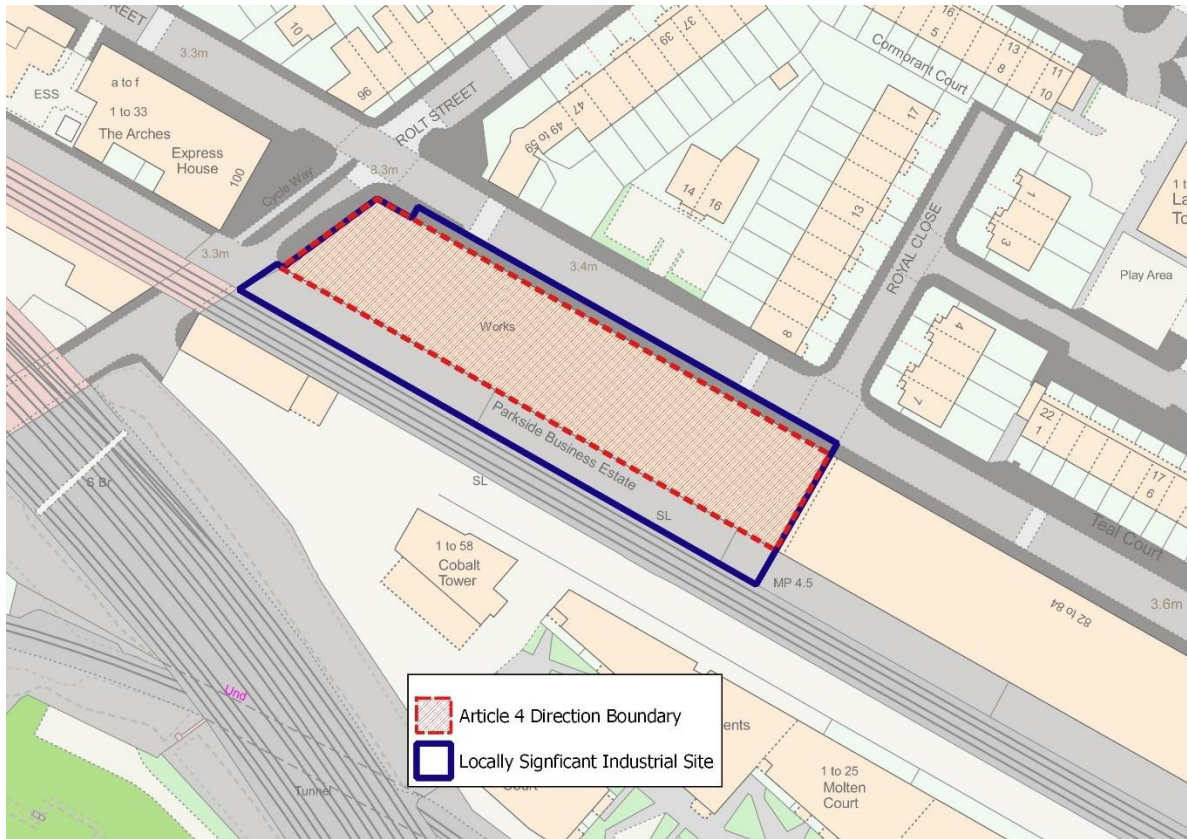


Table 31: Justification for the including areas across Childers Street West LSIS within the Article 4 Direction area proposed.

Area	Justification
	Include
Childers Street: 165	Building containing office and studios that contains elements necessary for habitation, including windows to allow natural daylight inside.

Assessment of wholly unacceptable adverse impacts

- 6.9. Without an Article 4 Direction, the introduction of residential uses to this location could compromise the long-term sustainability for retaining businesses or growing them in the future, therefore compromising the local economy.

Lower Creekside LSIS – northern focus

Figure 66: Map of proposed revised Article 4 Direction boundary in relation to Lower Creekside LSIS (northern focus).

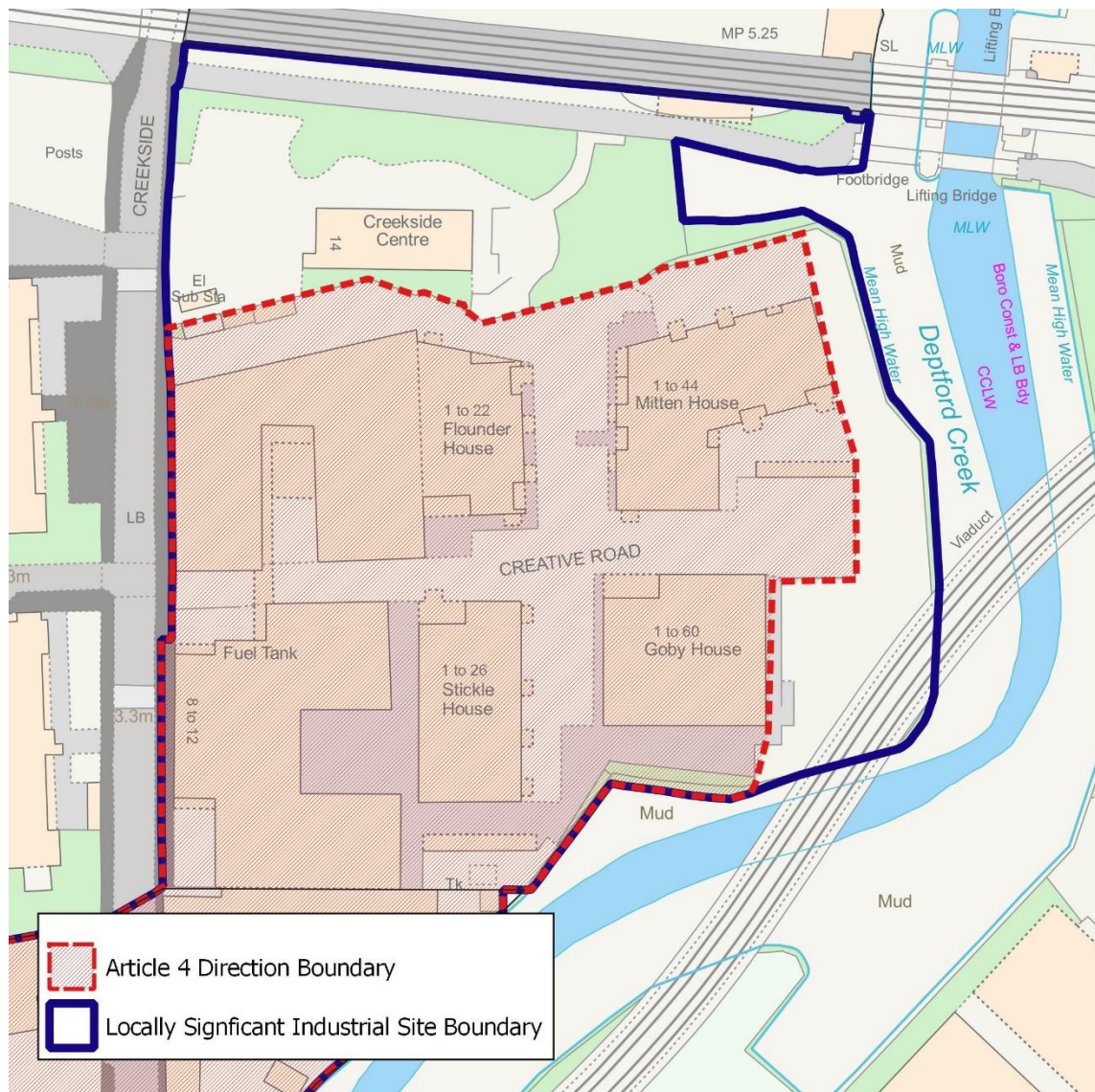


Table 32: Justification for including and excluding areas across Lower Creekside LSIS (northern focus) within the revised Article 4 Direction area proposed.

Area	Justification
Include	
Creekside: Fuel Tank	Ground floor office space which contains elements necessary for habitation, including windows to allow natural daylight inside.
Creative Road: Flounder House, Flounder House, Mitten House, Stickle House and Gobby House	
Exclude	
Creekside Discovery Centre	Proposed as strategic open space. Building would also fall under use F1 and therefore the permitted development would not apply.

Assessment of wholly unacceptable adverse impacts

- 6.10. The proposed revised Article 4 Direction covers 83% of Lower Creekside LSIS, which demonstrates a blanket approach has not been applied.
- 6.11. Without an Article 4 Direction, the introduction of residential uses to this location could compromise the long-term sustainability for retaining businesses or growing them in the future, therefore compromising the local economy.

7. Areas not covered by the Article 4 Direction.

- 7.1. Any buildings in Class E use which are located outside of designated town centres and industrial and employment areas have been excluded from the Article 4 Direction, therefore Class MA permitted development rights are still available to use for these buildings.
- 7.2. Notable locations that are not covered by the Article 4 Direction include the following parades:
- Baring Road: 52 to 62 and 53 to 67
 - Bell Green Retail Park
 - Brockley Road: 1 to 25, 35 to 57, 329 to 285, 308 to 296 and 242 to 262
 - Bromley Hill: 2 to 34
 - Brown Hill Road: 218 to 244
 - Ewhurst Road: 2 to 10
 - Lee High Road: 167 to 231 and 248 to 232
 - Loampit Vale: 120 to 36
 - Rushey Green: 25 to 368 and 28 to 398
- 7.3. The locations above collectively contain at least 150 units in Class E use that are not covered by the Article 4 Direction. In addition, there are individual buildings in Class E use throughout the Borough. In conclusion, the Council considers that there are ample opportunities for Class MA permitted development rights to be implemented.

8. Size of the areas covered by the Article 4 Direction following proposed revisions.

- 8.1. As shown in Table 33, the areas proposed to be covered by the Article 4 Direction in 2022 across Lewisham cover approximately 173 hectares, which equates to about 5% of the total Borough area. The areas that would result following the proposed revisions to these boundaries would cover approximately 70 hectares, which equates to only 2% of the total Borough area.
- 8.2. The proposed revisions to the boundaries would therefore result in a significant reduction of 60% in the size of the areas covered by the Article 4 Direction.

Table 33: Article 4 Direction statistics proforma

Area			
Area of the authority (ha)	3,515		
Coverage of Article 4 Direction	As proposed 2022	As per revised proposal	Reduction
Area of the authority covered by the Article 4 Direction (ha)	173	70	-60%
Percentage of the authority of the authority covered by the Article 4 Direction (%)	5	2	-3%

- 8.3. Table 34 shows Article 4 Directions statistics for town centres. Table 35 shows Article 4 Direction statistics for employment and industrial locations.

Table 34: Article 4 Direction statistics for town centres

Town centre	Town centre area (ha)	Proposed Article 4 Direction area (ha)	Percentage of the town centre covered by the Article 4 Direction (%)
Major Centres			
Catford	21.8	3	14
Lewisham	43.3	5.5	13
District Centres			
New Cross	15.5	0.9	6
Deptford	26.3	3	11
Blackheath	5	0.9	18
Lee Green	4.8	1.1	23
Forest Hill	14.2	1.3	9
Sydenham	11.2	2	18

Downham	2.9	0.9	31
Local Centres			
Evelyn Street	3.1	0.8	25
Lewisham Way	2.9	0.4	14
Brockley Cross	2.2	0.5	23
Ladywell	0.9	0.3	33
Crofton Park	2.6	0.8	31
Honor Oak/ Brockley Rise	2.3	0.8	35
Kirkdale	1.4	0.8	43
Bellingham	0.5	1.5	33
Downham Way	1.2	0.2	17
Grove Park	0.4	1.6	25
Lee Station	2	0.4	20
Staplehurst Road	1	0.3	30
Hither Green Lane	0.7	0.2	29

Table 35: Article 4 Direction Statistics for employment and industrial locations

Industrial or employment location	Industrial or employment location area (ha)	Proposed Article 4 Direction area	Percentage of the employment or industrial location covered by the Article 4 Direction (%)
Strategic Industrial Locations			
Surrey Canal Road	28.3	1.9	7
Bromley Road	8	0.8	10
Locally Significant Industrial Sites identified for co-location			
Apollo Business Centre	0.4	0.4	100
Blackheath Hill	0.3	0.3	100
Clyde Vale	0.4	0.4	100
Evelyn Court	0.3	0.3	100
Lower Creekside	2.4	2	83
Perry Vale	0.5	0.5	100
Stanton Square	1	1	100
Trundleys Road	0.5	0.5	100
Willow Way	1.2	1.2	100
Worsley Bridge Road	1.2	1.2	100
Locally Significant Industrial Sites not identified for co-location			
Childers Street West	0.3	0.2	63
Bermondsey Dive Under	0.6	0	0
Evelyn Street	1.19	0	0
Manor Lane	2.75	0	0

Molesworth Street Car Park	1.36	0	0
Malham Road	3.96	1	25
Lewisham Way LSIS	0.5	0	0
Endwell Road	1.38	1	72
Mixed Use Employment Locations			
Sun and Kent Wharf	1.4	1.4	100
Oxestalls Road	4.62	4.62	100
Thanet Wharf	0.61	0.61	100
Convoys Wharf	16.1	13.7	85
Plough Way	8.3	1.9	23
Arklow Road	2.2	0.94	43
Neptunes Wharf	0.8	0.5	63
Surrey Canal Triangle	10.9	6.6	61
Childers Street East	0.3	0.21	70