

LOCAL DEVELOPMENT FRAMEWORK

Catford Town Centre Area Action Plan

**COMMENTS RECEIVED FROM THE PREFERRED OPTIONS
CONSULTATION**

January 2008

Comments relating to Policies

CAAP1 - Core Shopping Areas

Within the Core Shopping Areas, as defined on the Proposals Map, the Council will strongly resist any change of use involving the loss at ground floor of an A1 use. The following factors will be taken into account when considering exceptions:

- a) Whether the proposal harms the overwhelming retail appearance of the shopping frontage, with an over concentration of non-retail uses (normally three non A uses together and 70% maintained in A use);
- b) Whether the proposal will generate a significant number of pedestrian visits; and
- c) Whether the proposal uses vacant units (having regard both to their number within the shopping centre as a whole and the Core Shopping Area and the length of time they have been vacant).

All non retail development within the Core Shopping Area, including where relevant changes of use, should:

- a) Not harm the amenity of adjoining properties, including that created by noise and disturbance, smell, litter and incompatible opening hours (all of which may be controlled by appropriate conditions);
- b) Provide attractive display windows and entrances that are compatible with adjoining shop units; and
- c) Make adequate provision for access for people with disabilities.

Respondent ID	Organisation	Nature of comment
MaRoMo26LoEC1A 2AT	Metropolitan Police Authority	Objecting

Comment

Policies CAAP1 - Core Shopping Areas and CAAP2 Non-Core Shopping Areas both restrict change of use of units from Class A1 to other uses. A key part of the MPA's estate review is to introduce police 'shops' into locations with good accessibility. The purpose of police 'shops' is to provide direct public interface facilities with the police, The Borough's town centres are ideally located to accommodate these facilities.

Therefore the MPA recommend the Council's policies allow the introduction of police 'shops' in the main shopping frontages of the town centres.

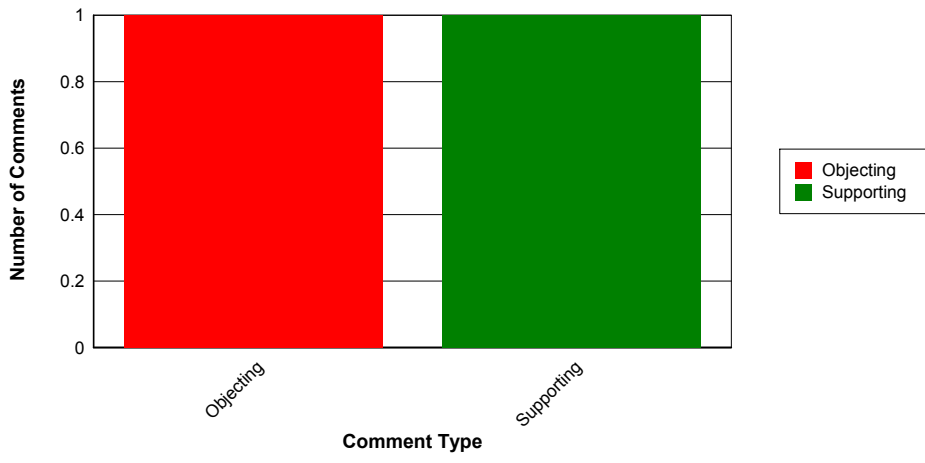
In addition, the MPA are in the process of introducing Safer Neighbourhood Teams into every ward across the Borough. These teams require office accommodation from which police officers can patrol local areas on bike or foot. Such office accommodation could be sited in local shopping centres and parades either in isolation or with police 'shops'.

The MPA request the Council's policies recognise the potential need for the introduction of these police facilities with the local shopping centres and parades.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment
Supported.

Summary



CAAP2 - Non-core shopping areas

Within the Non-Core Shopping Areas, proposals for development or change of use from an A use will generally be acceptable provided:

- a) A uses account for at least 40% of uses;
- b) It is to an A, A3, or appropriate A4 or A5 use or community or amusement centre;
- c) It does not harm the amenity of adjoining properties;
- d) It does not harm the retail character, attractiveness, vitality and viability of the shopping centre including unreasonably reducing the percentage of A units; and
- e) It is considered appropriate to the area's specific retail character.

Respondent ID	Organisation	Nature of comment
MaRoMo26LoEC1A 2AT	Metropolitan Police Authority	Objecting

Comment

Policies CAAP1 - Core Shopping Areas and CAAP2 Non-Core Shopping Areas both restrict change of use of units from Class A1 to other uses. A key part of the MPA's estate review is to introduce police 'shops' into locations with good accessibility. The purpose of police 'shops' is to provide direct public interface facilities with the police. The Borough's town centres are ideally located to accommodate these facilities.

Therefore the MPA recommend the Council's policies allow the introduction of police 'shops' in the main shopping frontages of the town centres.

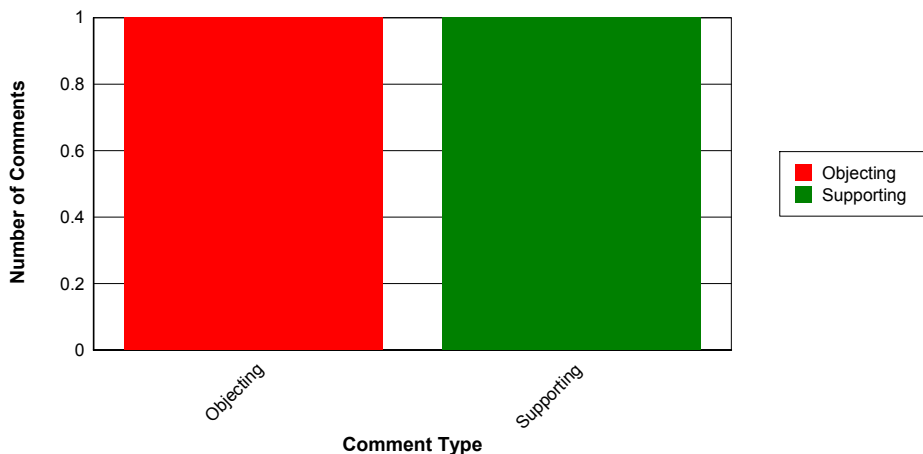
In addition, the MPA are in the process of introducing Safer Neighbourhood Teams into every ward across the Borough. These teams require office accommodation from which police officers can patrol local areas on bike or foot. Such office accommodation could be sited in local shopping centres and parades either in isolation or with police 'shops'.

The MPA request the Council's policies recognise the potential need for the introduction of these police facilities with the local shopping centres and parades.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment
Supported.

Summary



CAAP3 - Other shopping areas

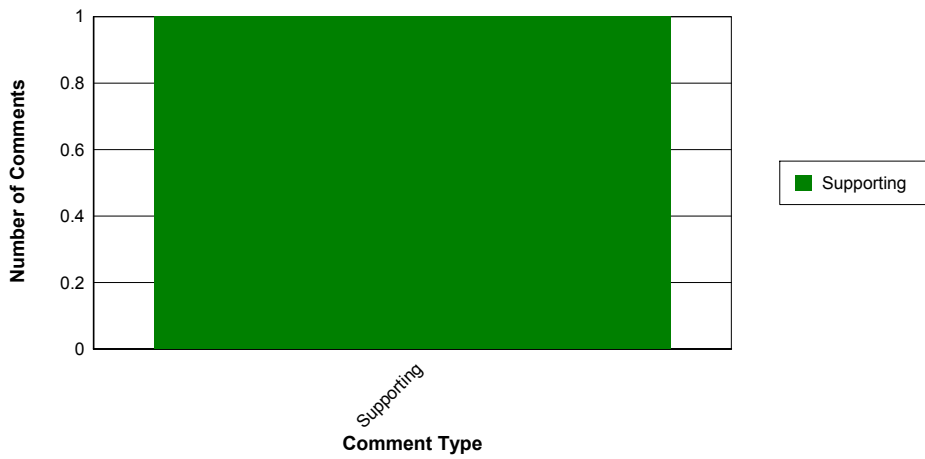
Outside the Core and Non-Core Shopping Areas, applications for development or change of use which involves the loss of an A use will normally be acceptable provided it does not harm the:

- a) Amenity of adjoining properties; and
- b) Character, attractiveness, vitality and viability of the centre as a whole.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment
Supported.

Summary



CAAP4 - Larger retail units

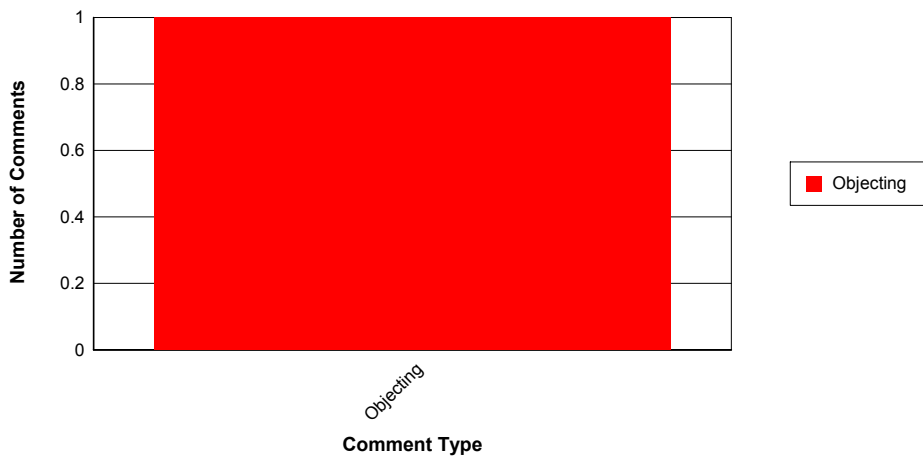
In the identified Core Shopping Area the loss of larger retail units of over 50 square metres gross floor area suitable for occupation by national multiples will be resisted unless it is demonstrated that there is a lack of demand.

Respondent ID	Organisation	Nature of comment
NiFi9 LoW1U 1HL	St Modwen Developments Limited	Objecting

Comment

4.1 At policy CAAP4 the loss of larger retail units of over 250 sq m should also be considered in the context of wider benefits offered by a scheme. This is particularly so in respect of the comprehensive redevelopment of Catford Shopping Centre. At Policy CAAP8 regarding loss of public houses, the reference to community uses at point b) should only apply when a function room or similar facility is included within the public house and not when it operates akin to a standard retail unit.

Summary



CAAP5 - Evening economy uses

(1)Restaurants and cafes (Use Class A3)

A3 uses will be granted permission where they satisfy the following principles:

- a) Their location, design, parking and traffic generation is acceptable and is not a danger to other road users, public transport operators or pedestrians; and
- b) They do not harm the living conditions of nearby residents, including that created by noise and disturbance from users and their vehicles, smell, litter and unneighbourly opening hours.

In addition, applicants will be expected to provide acceptable arrangements for:

- a) The efficient and hygienic discharge of fumes and smells, including the siting of ducts, which should be unobtrusive;
- b) The collection, storage and disposal of bulk refuse and customer litter;
- c) Sound proofing, especially to any living accommodation vertically and horizontally; and
- d) The impact on neighbours of the proposed opening hours which will normally be restricted to 8.00am to midnight.

(2) Pubs and bars (Use Class A4)

Proposals for pubs and bars (class A4) will be acceptable outside of the Core Shopping Area subject to the following considerations:

- a) The impact on neighbouring residential amenities;
- b) Proximity to schools, places of worship and similar sensitive uses;
- c) The appropriateness of the scale of the development for the location;
- d) The concentration and existing level of disturbance from A3, A4, A5 and other entertainment and leisure uses; and
- e) The appropriate provision of ventilation and extract ducting systems.

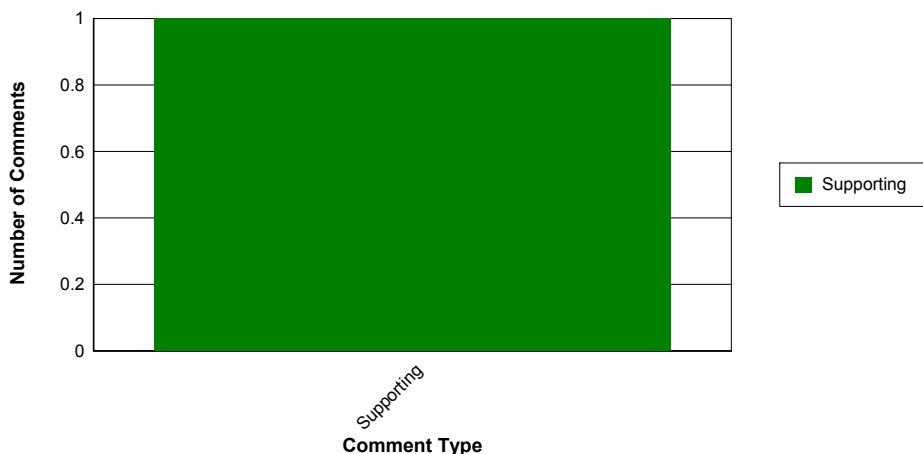
Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment

Support: The principle of the policy is supported. However, the requirement for developers to make acceptable arrangements for the impact of restaurants and cafes is not reflected in section 2 on pubs and clubs. The list a - d under section 1 should be included in section 2.

In addition, it would be useful to make reference to the Mayor's Best Practice Guidance on the Night Time Economy.

Summary



CAAP7 - Markets

The Council is committed to supporting the ongoing operation of the market and will work with market traders, retailers and other town centre stakeholders, to improve and enhance its operation in appropriate locations.

Respondent ID

GiDoCiThLoSE1 2AA

Organisation

Greater London Authority

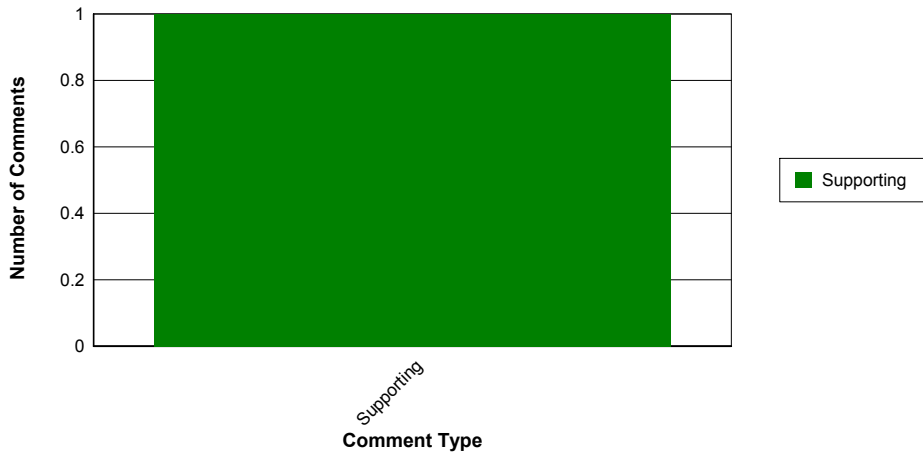
Nature of comment

Supporting

Comment

Supported.

Summary



CAAP8 - Public houses

The Council will only permit the change of use of public houses to other uses, or their demolition, where:

a) It has been demonstrated that there are alternative remaining public houses in the vicinity; and

b) That the potential for alternative community use of the building has been exhausted.

Respondent ID

GiDoCiThLoSE1 2AA

Organisation

Greater London Authority

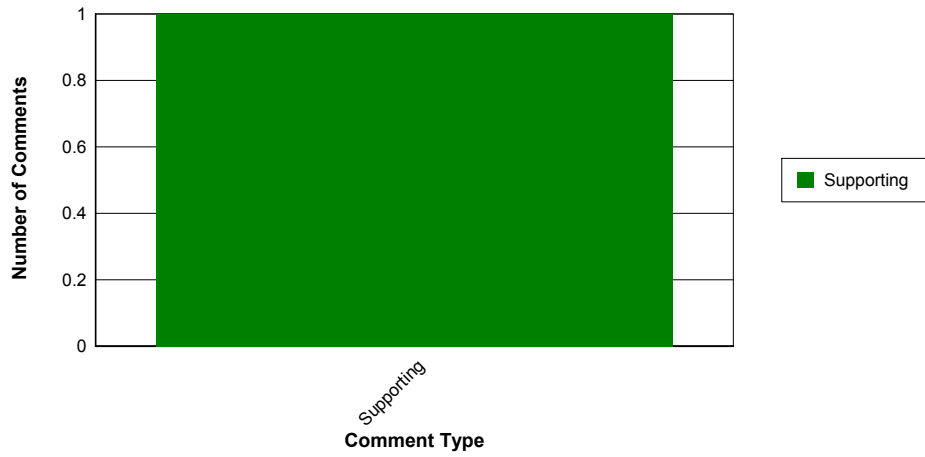
Nature of comment

Supporting

Comment

Supported.

Summary



CAAP10 - Employment space

The Council will seek:

- (a) To retain existing employment and office space; and
- (b) For large scale developments to provide suitable employment space as part of any mixed-use proposal.

Respondent ID	Organisation	Nature of comment
NIFI9 LoW1U 1HL	St Modwen Developments Limited	Commenting

Comment

Policy CAAP10 regarding Employment Space states at point B) that [the council will seek] for large scale developments to provide suitable employment space as part of any mixed-use proposal. This provides a general approach and it is important that it incorporates the full employment benefits of a development, such as those in retail and services and that any specific B class space is supported by market data.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Objecting

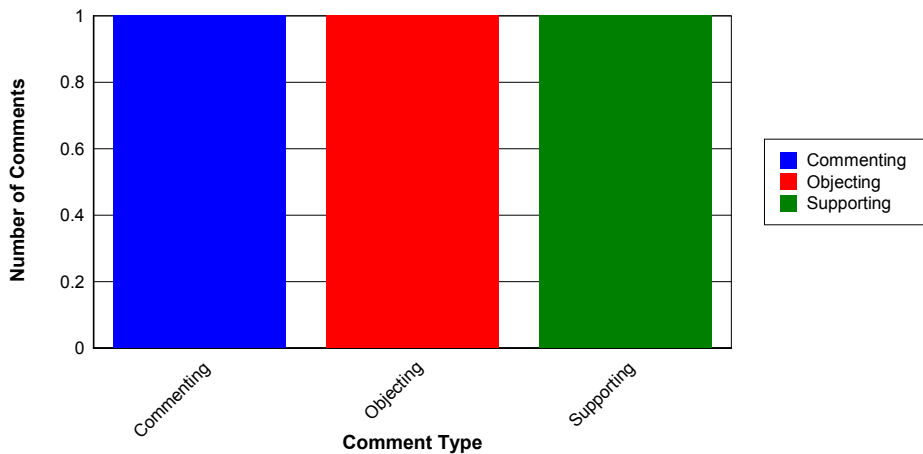
Comment

The LDA objects to the relaxed approach to employment land and seeks a more restrictive policy response. The requirement to deliver employment and training initiatives is supported, however this should be expanded to include methods to overcome barriers to work, for example childcare.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment
Supported.

Summary



CAAP11 - Tourism and tourist accommodation

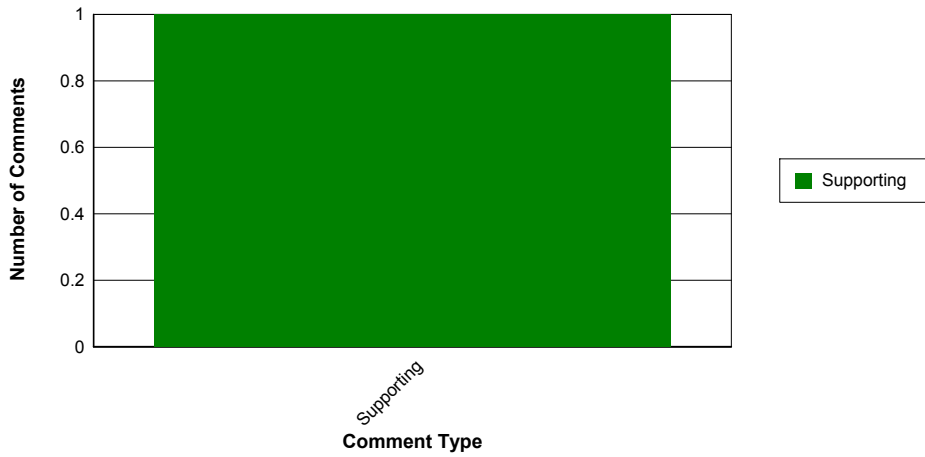
The Council will:

- (a) Welcome proposals for tourist accommodation falling within Use Class C subject to adequate highway considerations; and
- (b) Facilitate and support tourism by promoting local attractions and by providing street signing and other promotional activities.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment
Supported.

Summary



CAAP12 - Urban design principles

Development will be required to address the following criteria:-

Maximise use

Every site for development/redevelopment should maximise the potential of the site to ensure that no opportunity is lost to effect change, subject to the surrounding context and infrastructure capacity.

Mixed-use

An appropriate mix of uses will be encouraged both vertically and horizontally in the Catford Town Centre. In particular, residential development above ground floor retail and commercial uses will be encouraged.

Building footprint

Historic plot and street patterns should be respected and where appropriate extended in areas of new development/redevelopment. Large-scale development should be delivered as a series of smaller units, each capable of accommodating a range of uses over time.

Orientation

Development should be designed to accommodate active uses at street level, including shop fronts; entrances to residential or commercial properties; and windows, to ensure passive surveillance over public spaces and the creation of more interesting spaces and facades.

Building design

Buildings should front public spaces and on major streets and public spaces 'backs' of buildings should be avoided. A clear demarcation between public and private space should be maintained.

Tall buildings

Tall buildings should be of an outstanding architectural quality when compared to both existing development in Catford and also when compared to the best new buildings in London. Particular attention should be made to view lines to any new tall building.

Connection

Development should be designed to improve connections into and through the town centre, particularly for pedestrians, and where possible, create new public routes.

Crime prevention

Secured-by-design principles are to be considered in the design of new development in order to create spaces that minimise crime and make people feel safe.

Landscaping

Landscaping should be a priority for all development and includes trees, grass, seats and lighting.

Relationship with nature

Development adjoining or near the Ravensbourne River should be designed so that the natural elements of the area are protected and enhanced. The natural feel of the area should be continued through the development by incorporating appropriate landscaping and water features.

Heritage

Development close to any identified heritage asset should aim to protect or enhance that feature whilst being a distinctively designed proposal in its own right. Development should not seek to copy heritage features of nearby buildings, but should rather take forward important heritage features in a contemporary manner.

Respondent ID	Organisation	Nature of comment
DaHaLo20StLoSW1E 5RS	Natural England	Commenting

Comment

When providing new public spaces the Council should ensure that, where practical, consideration is given to green and or open spaces not just hard landscaped areas.

Respondent ID	Organisation	Nature of comment
SaBu1 LoWC2B 4AN	CABE	Commenting

Comment

Thank you for consulting the Commission for Architecture and the Built Environment (CABE).

Unfortunately, due to limited resources, we are unable to comment on this document. However we would like to make some general comments which you should consider.

1.Design is now well established in planning policy at national and regional levels, and LDFs offer an opportunity to secure high-quality development, of the right type, in the right place, at the right time.

2.Robust design policies should be included within all LDF documents and the Community Strategy, embedding design as a priority from strategic frameworks to site-specific scales.

3.To take aspiration to implementation, local planning authorities' officers and members should champion good design.

4.Treat design as a cross-cutting issue - consider how other policy areas relate to urban design, open space management, architectural quality, roads and highways, social infrastructure and the public realm.

5.Design should reflect understanding of local context, character and aspirations.

6.You should include adequate wording or 'hooks' within your policies that enable you to develop and use other design tools and mechanisms, such as design guides, site briefs, and design codes.

You might also find the following CABE Guidance helpful.

- "Making design policy work: How to deliver good design through your local development framework"
- "Protecting Design Quality in Planning"
- "Design at a glance: A quick reference wall chart guide to national design policy"

These, and other publications, are available from our website www.cabe.org.uk

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Objecting

Comment

Object: Whilst the design principles established are sound and supported, there is no requirement for inclusive design principles be met. A new criteria should be added which promotes inclusive design in both build developments and public realm/open space improvements in accordance with London Plan Policy 4B.5.

Respondent ID	Organisation	Nature of comment
NiFi9 LoW1U 1HL	St Modwen Developments Limited	Objecting

Comment

At policy CAAP12 'Urban Design Principles' the support for mixed use is welcomed with residential above ground floor retail. In terms of redevelopment and footprint it is not appropriate that historic street patterns are re-imposed on the Catford Shopping Centre as this could unduly affect the viability of its rejuvenation. While it is likely that the current single structure will be replaced by a more organic pattern it is important that it is not broken up to such an extent that the chance to optimise other benefits and maximise development is lost. This is especially relevant in light of the need to attract anchor retailers requiring larger store footprints to the centre, both to ensure higher visitor numbers generally and to draw greater footfall to those parts of the site located furthest from the prime frontages of Rushey Green and Catford Broadway.

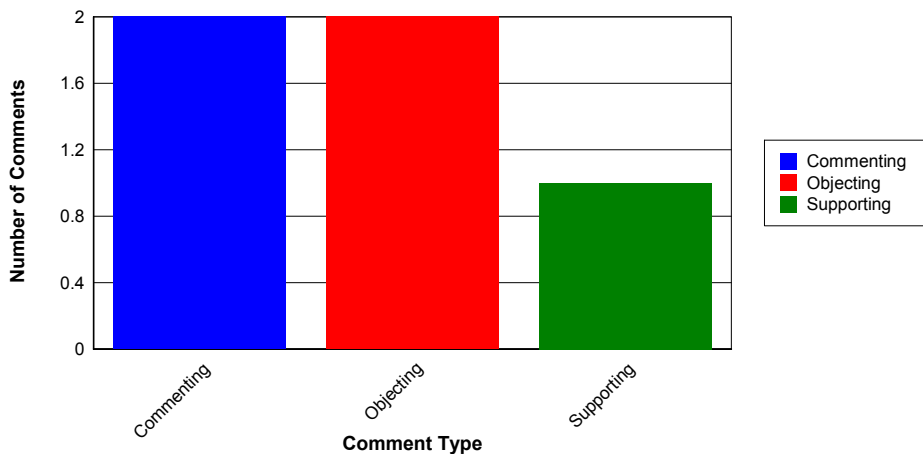
Respondent ID	Organisation	Nature of comment
MaRoMo26LoEC1A 2AT	Metropolitan Police Authority	Supporting

Comment

Policy CAAP12 Urban Design Principles, states that development will be required to address a number of criteria including crime prevention. It states, Secured-by-design principles are to be considered in the design of new development in order to create spaces that minimise crime and make people feel safe.

The MPA support the inclusion of this policy and recognise and welcome the fact that prior representations have been taken on board.

Summary



CAAP13 - Public spaces

(a) The Council will support public realm improvements particularly in association with all major developments.

Public spaces should be designed to be attractive, robust and easy to maintain.

(b) Development adjacent to proposed public space will need to address the contribution it makes to that space.

The use of planning obligations and conditions on planning permissions may be used in pursuit of this policy.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Objecting

Comment

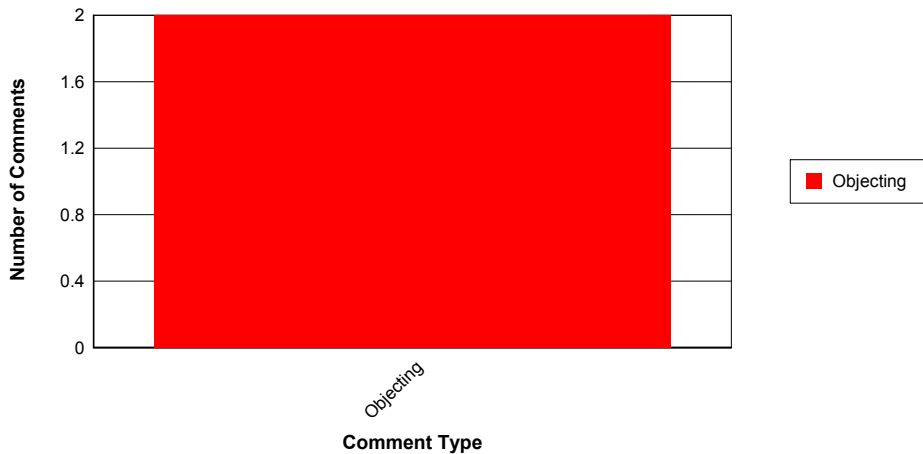
Object/omission: The requirement for public realm improvements, and new areas of public space, is supported. However, there should be positive promotion of children's play space within these areas, and specifically in new housing developments.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Objecting

Comment

Neither AAPs is proactive enough in promoting inclusive design of both individual developments and in public realm improvements. When establishing urban design criteria, as both AAPs do, it is vital that the need to ensure equal access for all is included. In addition, neither AAP supports a shopmobility scheme for the town centres. This is a vital facility, which should be secured through development, for example through s.106 agreements.

Summary



CAAP14 - Development and accessibility

(a) Major trip generating developments will be required to provide a Transport Assessment to be submitted with a planning application to assess the likely travel movements by all modes and their impact on congestion, safety, and the environment of the surrounding area. The scope of the assessment will reflect the scale of the development proposed and the extent of the transport implications.

(b) A travel impact statement would normally be accompanied by a travel plan.

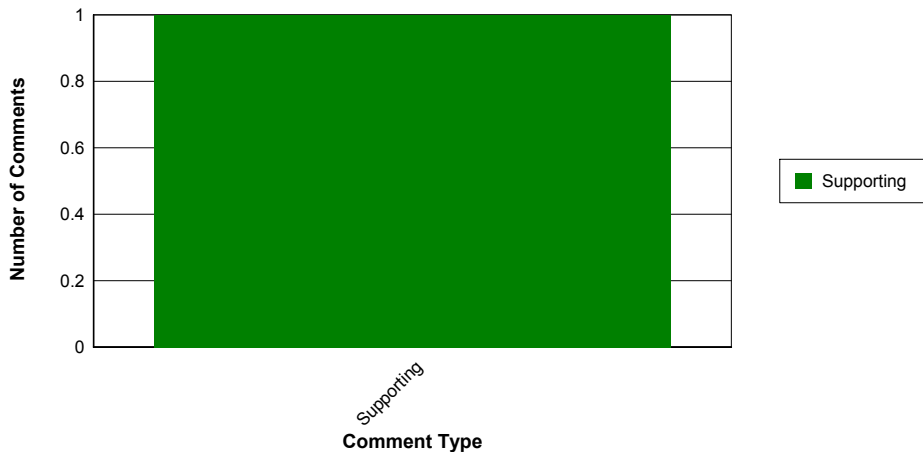
(c) Mitigation measures identified in the Transport Assessment will be secured through a condition or planning obligation on a planning permission.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment

Support: TfL strongly supports this policy and welcomes its inclusion into this document. TfL considers that all development proposals contained within the Area Action Plan boundary which are large enough to be referable to the Mayor should be accompanied by a comprehensive transport assessment, taking into account planned and committed developments. The transport assessment should be formulated in line with TfL's Transport Assessment Best Practice Guidance (2006). A reference to this guidance in this policy would be helpful. The borough may also wish to consider seeking transport assessments for smaller developments in addition.

Summary



CAAP15 - Travel Plans

(a) Developments that will have a significant transport implication will be required to submit a Travel Plan in order to reduce the impact of travel and transport on the environment.

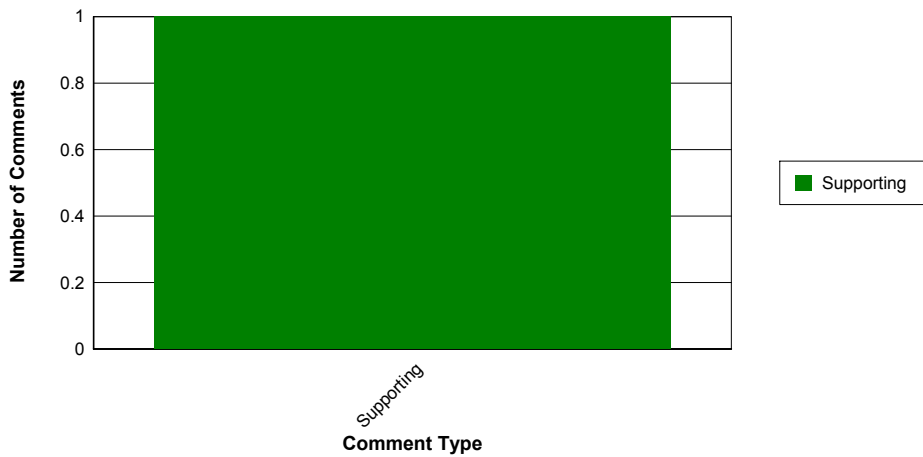
(b) The implementation of a Travel Plan will be secured through a planning obligation or a condition on a planning permission.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment

Support: TfL strongly supports this policy and welcomes its inclusion into this document.

Summary



CAAP16 - Transport Infrastructure

In appropriate circumstances, planning obligations will be sought for:

- (a) Highway improvements or traffic management measures, which are necessary for a development to proceed; and/or
- (b) Public transport improvements to services or facilities, specifically for the Catford and Catford Bridge railway stations; and/or
- (c) Other measures to improve accessibility for pedestrians and cyclists.

The cumulative impact of a development will also determine if and when planning obligations are sought.

Respondent ID	Organisation	Nature of comment
NiFi9 LoW1U 1HL	St Modwen Developments Limited	Objecting

Comment

In terms of policy CAAP16 & CAAP22 and transport infrastructure the existing size and capacity of Catford Shopping Centre and Milford Towers should be considered when contributions for improvements such as Catford stations are considered which should be centrally funded by the rail operators and only in some cases by development that increase on existing development levels. Likewise at policy CAAP16 contribution towards centrally planned improvements such as TfL's new South Circular road should be assessed in the context of the overall viability and development cost of a proposal. The impact that onerous contribution could have on other benefits such as affordable housing levels should be considered.

Respondent ID	Organisation	Nature of comment
FrRo30HiOrKeBR6 0NN	St Dunstons College Educational Foundation	Supporting

Comment

5. Many of the pupils and staff travel to the School by public transport but more could be encouraged to do so if the accessibility by public transport, including rail and bus services, was improved to provide easy, safe and attractive routes to the School for staff and pupils, particularly from the two nearby railway stations, Catford and Catford Bridge. The implementation of the Catford Town Centre Area Action Plan could promote the necessary upgrading which the School would welcome. The College, therefore, welcomes and supports the Council's approach.

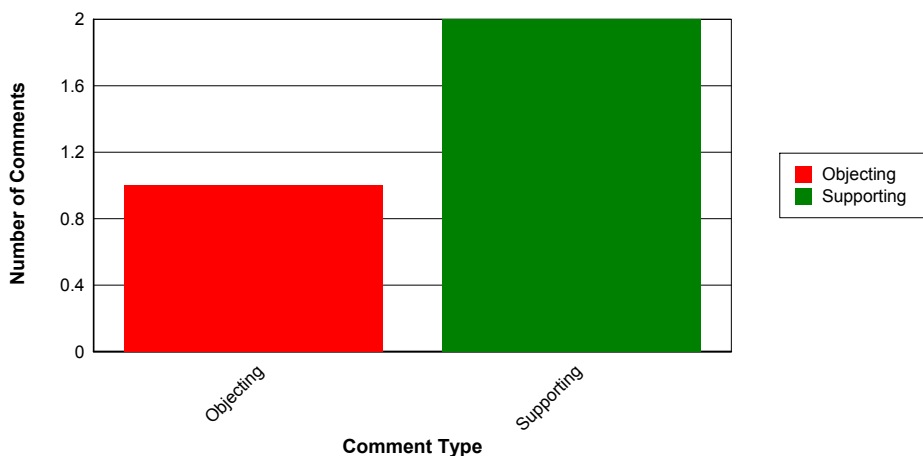
Whilst generally supportive of the proposals set out in the document the School would like to see some specific reference to the importance of the College site to the proposals set out in the Area Action Plan and particularly in respect of providing additional justification for the implementation of the proposed environmental improvements around the School and between the School and the railway stations.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment

Support: TfL will continue to work with the borough to develop proposals to realign the A205 South Circular to the south of Lawrence House. TfL suggest that contributions should also be sought towards the re-alignment of the South Circular.

Summary



CAAP17 - Car free residential development

The Council will support car free development provided that:

(a) There is very good public transport accessibility; and

(b) Developers can demonstrate that the development will have no adverse impact on on-street car parking.

Where this policy applies, residents will not be eligible for an on-street parking permit.

Respondent ID

GiDoCiThLoSE1 2AA

Organisation

Greater London Authority

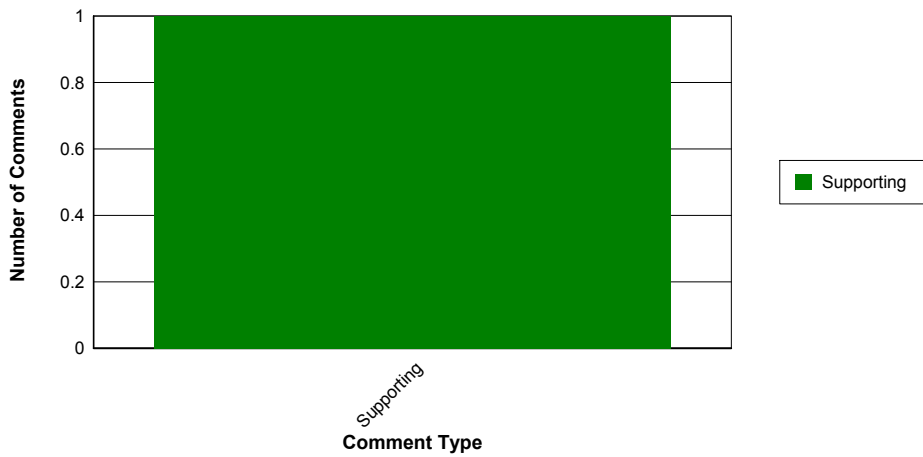
Nature of comment

Supporting

Comment

Support: TfL strongly supports the proposed car parking standards, which conform with the London Plan. It is noted that cycle parking provision is outlined according to the borough's UDP.

Summary



CAAP18 - Controlled Parking Zones

Proposals which adversely affect on-street parking may be required to contribute to the introduction of a Controlled Parking Zone (CPZ) and a planning obligation may be sought to secure funding.

Respondent ID
GiDoCiThLoSE1 2AA

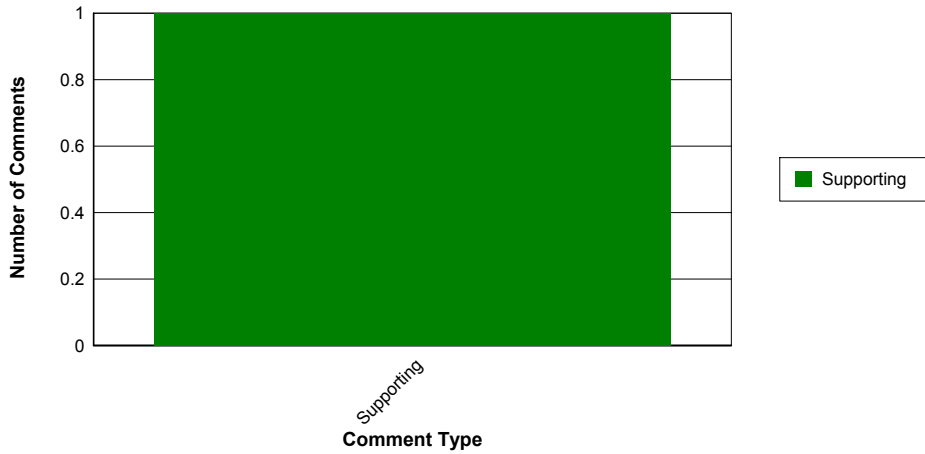
Organisation
Greater London Authority

Nature of comment
Supporting

Comment

Support: TfL strongly supports this positive policy and welcomes its inclusion in this document.

Summary



CAAP19 - Car Parking Standards

The Council will normally require development to make provision for off-street parking in accordance with the standards set out in Appendix 4. New development should:

- (a) Provide conveniently located spaces designate for the use by people with disabilities;
- (b) Where appropriate, encourage multi-use parking, including the public use of private commercial car parking spaces; and
- (c) Have regard to the level of public transport accessibility.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment

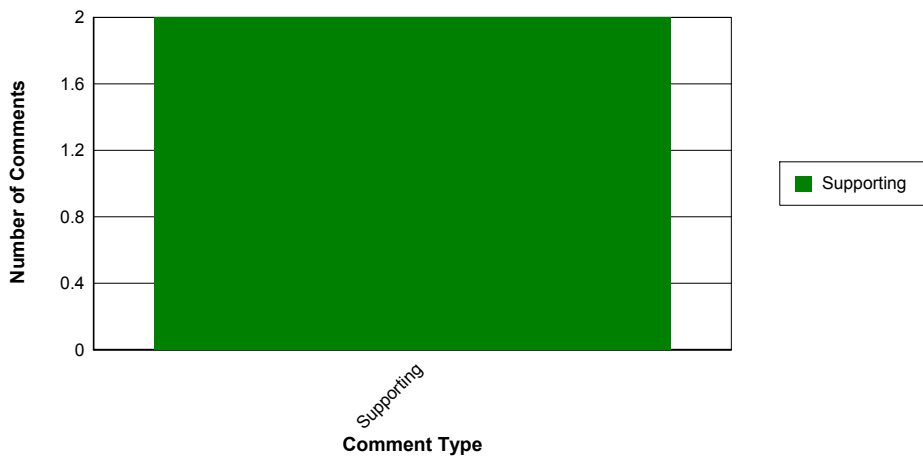
Support: TfL strongly supports this positive policy and welcomes its inclusion in this document.

Respondent ID	Organisation	Nature of comment
NiFi9 LoW1U 1HL	St Modwen Developments Limited	Supporting

Comment

At policy CAAP19 and Appendix 4 the parking is in line with the London Plan parking standards. The flexibility implicit in London Plan policy 3C.23 (Parking in Town Centres), needs to be re-affirmed, as higher levels of parking may be necessary to assist the town centre regeneration and retain and attract the anchor tenants needed.

Summary



CAAP20 - Motorcycle Parking

The Council will normally require development to make provision for motorcyclists and allocate parking space in appropriate development.

Respondent ID
GiDoCiThLoSE1 2AA

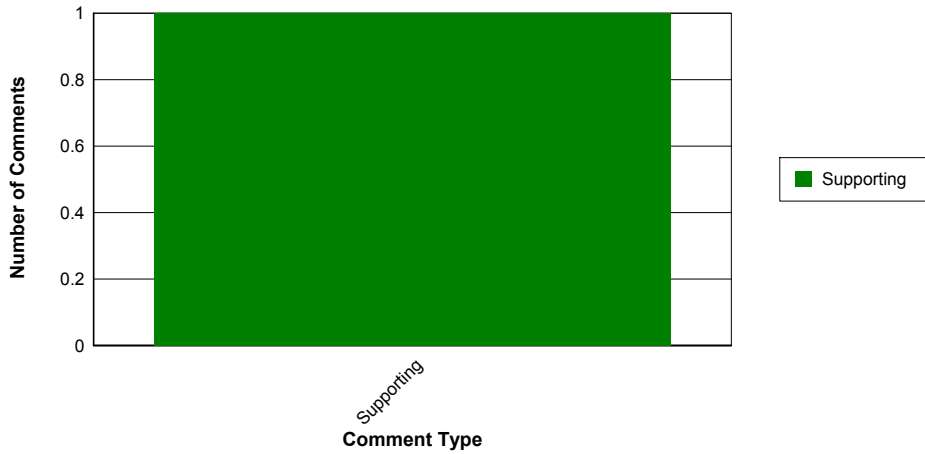
Organisation
Greater London Authority

Nature of comment
Supporting

Comment

Support: TfL strongly supports this positive policy and welcomes its inclusion in this document.

Summary



CAAP21 - Promotion of Public Transport

The Council will work in partnership with relevant agencies to extend public transport to and from the town centre particularly through the support of the London Bus Priority Network. The use of planning obligations and conditions on planning permissions may be used in pursuit of this policy.

Respondent ID

GiDoCiThLoSE1 2AA

Organisation

Greater London Authority

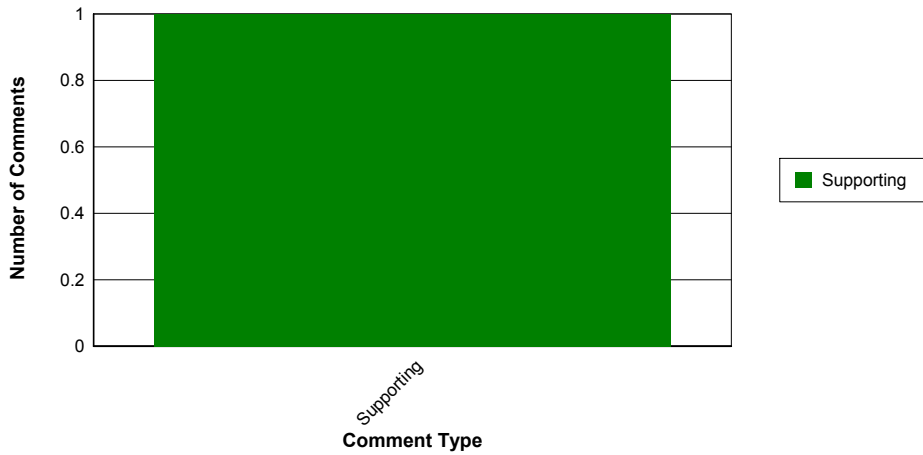
Nature of comment

Supporting

Comment

Support: TfL strongly supports this positive policy and welcomes its inclusion in this document.

Summary



CAAP22 - Transport Interchanges

(a) Better interchange within public transport, and between public transport and private transport, will be sought as opportunities arise. Where appropriate developments should improve such facilities and provide for cycle access.

(b) Interchange and railway station improvements at the Catford stations will be pursued with relevant agencies.

(c) The use of planning obligations and conditions on planning permissions may be used in pursuit of this policy.

Respondent ID	Organisation	Nature of comment
NiFi9 LoW1U 1HL	St Modwen Developments Limited	Objecting

Comment

In terms of policy CAAP16 & CAAP22 and transport infrastructure the existing size and capacity of Catford Shopping Centre and Milford Towers should be considered when contributions for improvements such as Catford stations are considered which should be centrally funded by the rail operators and only in some cases by development that increase on existing development levels. Likewise at policy CAAP16 contribution towards centrally planned improvements such as TfL's new South Circular road should be assessed in the context of the overall viability and development cost of a proposal. The impact that onerous contribution could have on other benefits such as affordable housing levels should be considered.

Respondent ID	Organisation	Nature of comment
FrRo30HiOrKeBR6 0NN	St Dunstans College Educational Foundation	Supporting

Comment

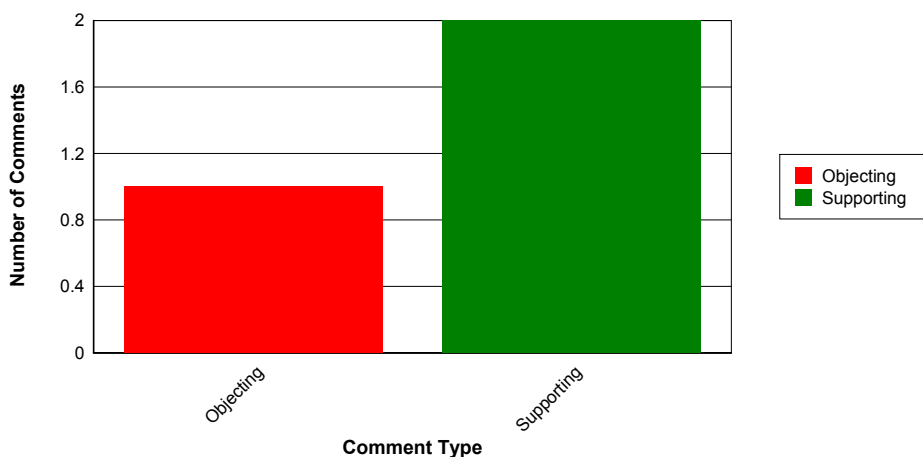
It follows that in Section 4.5 Transport, options 1A, 1B, 3A and 3B are strongly supported. Additionally, draft policies CAAP22 (Improvement to Transport Interchanges) and CAAP23 (Promotion of Walking and Cycling) should be pursued. Such objectives are certainly in the interests of promoting the accessibility of the School by non car-based modes.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment

Support: TfL strongly supports this positive policy and welcomes its inclusion in this document, particularly in relation to improving links and the public realm in the area around Catford and Catford Bridge stations. For information, Network Rail have a plan to develop the Catford Station building on the east side, including a lift and a ramped bridge to the west side to achieve DDA.

Summary



CAAP23 - Walking and cycling

The Council will seek:

- (a) To provide a comprehensive system of safe and well signposted walking and cycling routes, both through and to the town centre, including the Waterlink Way along the Ravensbourne River;
- (b) To use design features to help define key pathways within the town centre, such as from the railway stations through the civic quarter and Catford Broadway onto the Catford Shopping Centre and through to Rushey Green high street;
- (c) Take account of the needs of cyclists in the design of highway improvement schemes; and
- (d) Provide secure, attractive, convenient and adequate cycle parking and changing facilities in the town centre, public transport interchanges and on business, residential and leisure developments.

The Council will seek to safeguard the Waterlink Way and to identify opportunities to improve the continuity of the route by working with relevant landowners and the Environment Agency.

The use of planning obligations and conditions on planning permissions may be used in pursuit of this policy.

Respondent ID	Organisation	Nature of comment
FrRo30HiOrKeBR6 0NN	St Dunstans College Educational Foundation	Supporting

Comment

It follows that in Section 4.5 Transport, options 1A, 1B, 3A and 3B are strongly supported. Additionally, draft policies CAAP22 (Improvement to Transport Interchanges) and CAAP23 (Promotion of Walking and Cycling) should be pursued. Such objectives are certainly in the interests of promoting the accessibility of the School by non car-based modes.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment

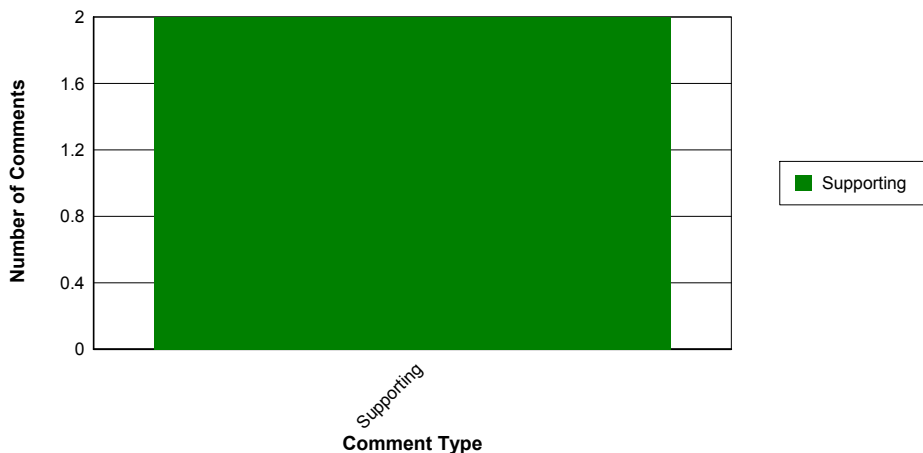
Support: TfL strongly support the positive policies and statements contained within this document, which relate to the promotion of cycling and walking, including improving connectivity and permeability, and enhancing existing links. It would further enhance the document if reference to TfL's Walking and Cycling Plans could be made.

It is further noted and supported that new at-grade pedestrian crossings will be introduced. TfL would expect these to comply with BV 165 standards. It is stated that redevelopment would need to analyse the movement of people in order to provide logical pedestrian and cycle links, which is supported. TfL would recommend that the following be utilised to assist in this which could be referred to in this document:

- A Pedestrian Environment Review System audit;
- Pedestrian and cycle counts; and
- Fruin Level of Service to ensure that pedestrian facilities are providing adequate capacity for pedestrian numbers (particularly as it is stated that pavements become crowded at peak times).

TfL would welcome further discussions on this and further information can be obtained from TfL's Best Practice Guidance on Transport Assessments.

Summary



CAAP24 - Construction

All proposed developments will need to incorporate sustainable design and construction measures appropriate to the scale and type of development.

Respondent ID	Organisation	Nature of comment
ChAmEa30LoSE1 7TL	Environment Agency	Commenting

Comment

Design quality is fundamental to how places work. This may include public spaces that are safe and attractive and buildings that are at appropriate scale and density to support local services. Places that respect their context, using it as a starting point to enhance local character, and so connect, physically and socially, to the surrounding built environment and landscape, are more likely to have a strong, positive identity. A well-designed neighbourhood should also be sustainable socially, economically and environmentally.

Places that are sustainable, functional and distinctive are consequently more attractive to investors and home-buyers alike. Design for environmental performance should be the key. Building Regulations may require new homes to be 'zero carbon' by 2016. The AAP should consider whether existing buildings remain fit for purpose under new climatic conditions.

Quality design should create landscapes that are multi-functional and provide opportunities for water and energy saving. It should also create neighbourhoods where it is convenient and safe to walk or cycle to shops, schools and access to public transport. Well designed places should create mixed neighbourhoods where a range of types and tenures of houses and flats are available for all, where people can move to another home locally when their circumstances change

The AAP should show how the needs of the disabled or older people would be met. It should make the developers understand the access needs of different users and make sure the design allows for inclusive access. Uses open to the public, such as shops, hospitals or hotels, must be accessible to everyone, and homes must be accessible for all visitors. The Disability Rights Commission has produced guidance on access statements. This explains how access should be considered from the start of the design process through to the building and final use and maintenance of building or space.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Objecting

Comment

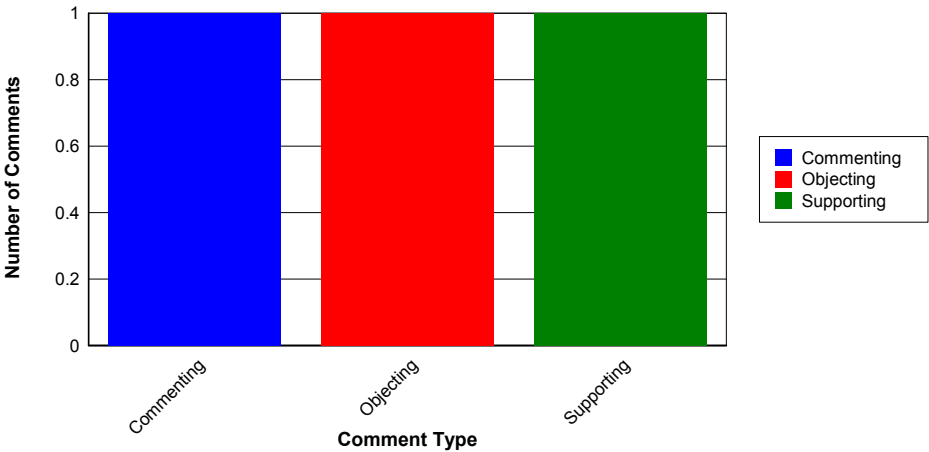
On balance, the sustainability, and particularly the energy policies, within the Development Polices document are supported. These are repeated in the Catford AAP. However neither AAP address the need to actively promote and secure district heating at the town centre level, led by combined heat and power to serve proposed and existing developments. This is a key component of the draft Further Alterations to the London Plan, as amended by documents submitted to the recent Examination in Public. The AAP documents are the appropriate method with which to establish policy support for this approach. The current documents therefore raise serious strategic concern in this regard and GLA officers would be keen to follow this up in detail with Lewisham Council.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment

Support: The Council should also ensure that all developers follow the principles in the Mayor's Sustainable Design and Construction Supplementary Planning Guidance. Reference could usefully be made to this document.

Summary



CAAP25 - Energy efficiency and renewables for major developments

The Council will require proposals for major developments with a floor space of over 1000m² , or ten or more residential units to:

- a) Provide an assessment of energy demand and the expected energy and CO emissions savings from energy efficiency and renewable energy measures incorporated into the development, including the feasibility of CHP/CCHP and community heating systems.
 - b) Achieve a 3* rating under the Code for Sustainable Homes or BREEAM 'Very Good rating'. The Council will expect this to be supported by a commitment to achieve certification under an appropriate scheme at the detailed design stage.
 - c) To incorporate on-site renewable energy equipment to reduce predicted CO emissions by at least 20%.
- Applicants will be required to provide a full feasibility study of all renewable technologies considered. The above measures may be secured through planning obligations or by condition.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Objecting

Comment

Omission: Although the document sets high standards in energy efficiency and renewable energy on individual developments, which is in line with the Council's development policies preferred options, there is strategic concern about the lack of a specific town centre wide policy approach to energy delivery. The draft Further Alterations to the London Plan prioritises district heating at the town centre level, led by combined heat and power to serve proposed and existing development. The AAP should maximise the opportunities to link developments through a district network

Respondent ID	Organisation	Nature of comment
NiFi9 LoW1U 1HL	St Modwen Developments Limited	Objecting

Comment

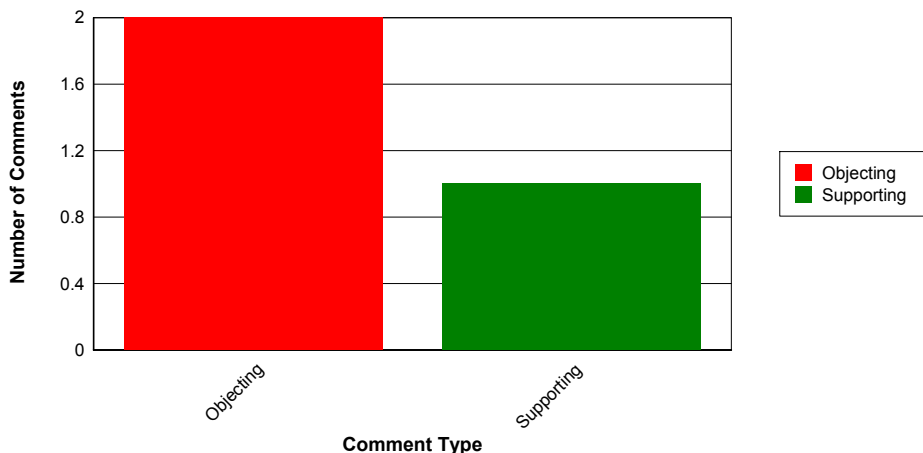
Policy CAAP25 requires that on site renewable equipment is incorporated to reduce predicted CO₂ emissions by at least 20%. This policy is too prescriptive for an Area Action Plan and a broader approach to reducing the carbon impact of the development should be taken. The reduction of CO₂ emissions from the building need not be through on site generation at the level proposed as this may not be the most efficient means to achieve carbon savings which is the objective. This policy fails to take into account the energy reduction which can be achieved through design and that other locations may generate renewable energy more efficiently. Draft Planning Policy Statement 1 Planning & Climate Change supports a 10% on site renewable requirement until the feasibility of alternatives is tested through the LDF process. The wider planning policy framework including the London Plan does not currently support a higher target figure. Considerable debate on the merits of Merton Rule policies are expected in the near future.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment

Support: The principle of this policy is supported, and the requirement for 20% carbon dioxide savings from renewables is welcomed. This exceeds current London Plan policy, and recognises the draft Further Alterations to the London Plan.

Summary



CAAP26 - Stand alone and roof mounted renewable energy

Installation of stand alone and roof mounted renewable energy schemes will be permitted provided that the following criteria are met:

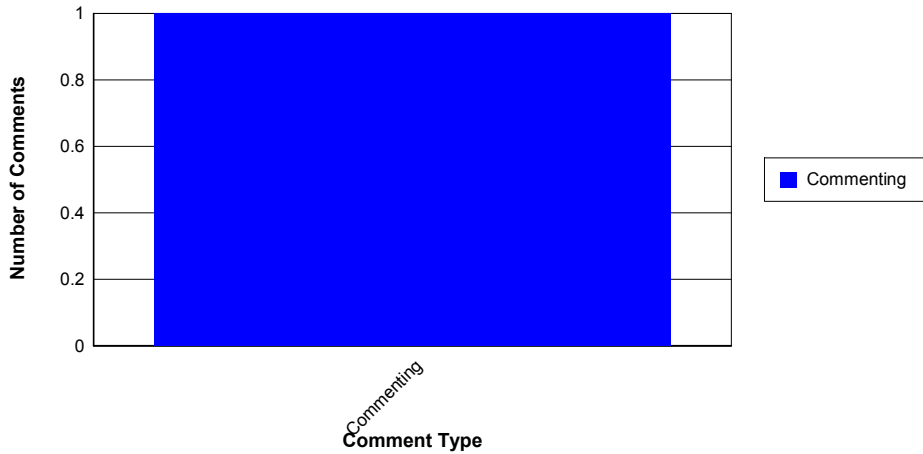
- a) the impact of noise and vibration from mechanical components is considered satisfactory;
- b) the visual amenity from public viewpoints is safeguarded;
- c) there is no adverse impact from reflected light and shadow flicker on adjoining land-uses; and,
- d) any impact on open space areas / conservation areas / historic buildings/ general character of the area, is considered satisfactory.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Commenting

Comment

Comment: The policy should take a more positive and proactive approach to wind turbines as an important part of current renewable energy solutions. For example, the requirement to protect the visual amenity from public viewpoints is not supported – there is no definition of public viewpoints, and no indication how or why wind turbines would negatively effect visual amenity. Whilst it is acknowledged that wind turbines are not suitable in every location, policy should be supporting their inclusion apart from in very special circumstances.

Summary



CAAP27 - River water quality

(a) The Council will seek to protect and improve the water quality of the River Ravensbourne to create healthy and attractive natural habitats, by ensuring development minimises the amount and intensity of urban run-off and discharge of pollutants into the river system.

(b) The Council will oppose proposals that are likely to lead to a reduction in water quality, unless suitable mitigation measures are provided.

Respondent ID	Organisation	Nature of comment
ChAmEa30LoSE1 7TL	Environment Agency	Supporting

Comment

We support this draft policy. The AAP should ensure that a significant proportion of the energy supply of substantial new development is gained on-site and renewably, and/or from decentralised, renewable or low carbon energy supply and support the use of renewables, CHP and bio fuels. It should promote the use of recycled building materials and materials that have low embodied energy and also promote retrofitting existing buildings to make them more energy efficient

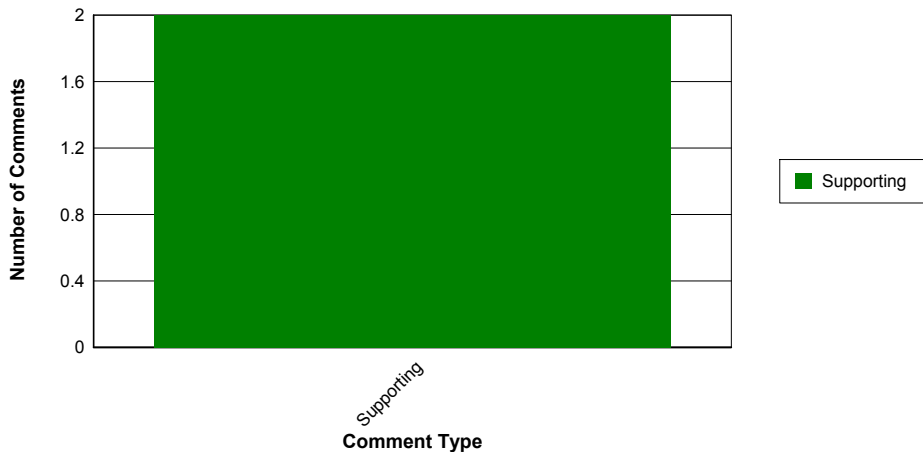
The policy performance would be monitored by comparing - total electricity and gas use, electricity generated from renewable energy sources and CHP located in the area, embodied energy in new buildings and percentage of new homes conforming to recognised codes for sustainable buildings. This information would be obtained from the following sources: -

- Audit Commission Area Profiles-household and individual energy use, by local authority
- Department of trade and Industry(Currently Department for Business and Enterprise)- energy trends
- Environment Change Institute-emissions from buildings, appliances Renewable Energy Statistics Database-renewable energy

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment
Supported.

Summary



CAAP28 - Water Resources

The Council will require proposals to demonstrate that water is available for the operational phase of the development and that the following measures have been addressed:

- (a) Main water use is minimised;
- (b) Rainwater harvesting opportunities are maximised; and
- (c) Grey water recycling systems are incorporated.

Respondent ID	Organisation	Nature of comment
ChAmEa30LoSE1 7TL	Environment Agency	Commenting

Comment

River Ravensbourne and its Tributaries

Catford and Lewisham have the River Ravensbourne and its tributaries running through them and is a significant local and regional amenity. This proposed Policy aims to ensure that the setting of the rivers is protected and enhanced. This involves protection of landscape features that contribute to the setting and protecting and enhancing views of the river. Particular care will be needed in assessing the visual impact of development proposals in locations that form part of the setting of the river to ensure that the setting is not damaged and that new development makes a positive contribution to the riverside environment.

Proposed Policy: Recreational use of the River Ravensbourne

Facilities which support the recreational use of the River Ravensbourne will be safeguarded and promoted by:

- a) refusing development which involves the loss of facilities unless it can be demonstrated they are no longer required.
- b) supporting the maintenance and provision of visitor facilities, including those for access to the water.

Proposed Policy: River Ravensbourne and its Tributaries

The Council will seek to maintain and look for opportunities to enhance the setting of and increase space for the River Ravensbourne and its tributaries. In considering development proposals it will:

- a) Ensure the protection of landscape features that contribute to the setting of the rivers
- b) Seek to protect and enhance existing views of the rivers
- c) Pay special attention to the design of development located in riverside settings to ensure that it respects and makes a positive contribution to the setting of the rivers
- d) Ensure that the quality of the water environment is maintained
- e) Seek opportunities to improve public access to and alongside the rivers and ensure that existing public access is maintained

Respondent ID	Organisation	Nature of comment
ChAmEa30LoSE1 7TL	Environment Agency	Commenting

Comment

Greening New Development

We would encourage the council to incorporate green roofs in new developments.

Benefits:

Water: Once installed, an average of 75% of rain falling onto extensive green roofs can be retained in the short term. Green roofs can therefore be useful components of SUDS (Sustainable Urban Drainage Systems) schemes and rainwater harvesting schemes.

Air: Vegetation filters particulates from the air and absorbs gaseous pollutants. Roof space is under-utilised and green roofs covering a large enough area could play a role in improving air quality.

Climate change: The presence of vegetation on a roof instead of a flat, bright reflective roof reduces the 'urban heat island'. Research at Trent University has found that on a typical day with a temperature of 18.4oC a normal roof surface temperature was 32oC while that of a green roof was 15oC. In an increasingly warmer climate it is vital to reduce ambient air temperatures where possible.

Biodiversity: Green roofs are good for wildlife, if designed with this in mind. They can help achieve Biodiversity Action Plan targets and can support protected species: roofs in the UK are known to support skylarks, Black Redstarts, plovers, terns, invertebrates, reptiles and even rare orchids.

Landscape: Green roofs create attractive open spaces to look at or screen less pleasant areas such as equipment areas. They provide an additional area of green space and contribute towards the implementation of green infrastructure strategies.

Social: Contact with green space and nature offers real social and health benefits. In a densely urban area, green roofs can play a role in access to nature, for example, by acting as outdoor classrooms.

Energy and Sustainable construction: Protecting the roof from sunlight and temperature fluctuations means a longer life for the roof and reduced energy costs such as heating and air conditioning. Research carried out recently has shown that green roofs can reduce energy usage in buildings by 25%.

Waste: Recycled materials can be used on green roofs such as crushed brick and aggregates from the site itself, reducing the amount taken to landfill.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Commenting

Comment

Comment: The principle of this policy is supported and welcomed. The policy should seek to promote the use of water meters in new development as a method of minimising mains water use. This is a Mayor's Essential Standard in the Sustainable Design and Construction SPG. The policy could usefully refer to the draft FALP 4A.11 policy, which establishes a maximum water use target of 40m³ per bedspace per year for residential development.

Respondent ID	Organisation	Nature of comment
GeCoCIVaReBeRG1 8DB	Thames Water Property Services	Objecting

Comment

Further to previous representations we are pleased to see that the draft AAP does make specific reference to Water Resources in Policy CAAP28. However, it is considered that this policy requires further clarification and that reference also needs to be made to sewerage infrastructure.

Paragraphs B3 to B8 of PPS12 place specific emphasis on the need to take account of infrastructure such as water supply and sewerage in preparing Local Development Documents. Paragraph B3 in particular states: "The provision of infrastructure is important in all major new developments. The capacity of existing infrastructure and the need for additional facilities should be taken into account in the preparation of all local development documents. Infrastructure here includes water supply and sewers, waste facilities...."

It is essential that the AAP makes reference to both the provision of adequate water and sewerage infrastructure to service development to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems.

It is also essential that the AAP makes adequate reference to water and sewerage infrastructure capacity to meet the test of "soundness" as set out in PPS 12. In December 2005 The Planning Inspectorate published "Development Plans Examination – A Guide to the Process of Assessing the Soundness of Development Plan Documents". The Guide sets out a series of 'key questions and evidence requirements' at section 1.4 which aim to provide a framework for the assessment of soundness of DPDs.

The most relevant key question under Conformity Test iv (a) is:

"Key Question - Has adequate account been taken of the relationship between the proposals in the DPD and other requirements, such as those of utility companies and agencies providing services in the area including their future plans or strategy and any requirements for land and premises, which should be prepared in parallel?" A key source of evidence which is identified in answering this question is: "Evidence - Of particular significance, will be representations from bodies that consider that the DPD either does or does not have sufficient regard to other relevant strategies for which they are responsible".

There are also a couple of relevant key sources of evidence identified in answering Coherence Test number (vii). The sources of evidence are:

"If the DPD is a Core Strategy, the following documents, amongst other evidence, may be relevant:infrastructure providers' investment programmes and strategies; environmental programmes etc."

"If the DPD is an Area Action Plan, evidence may includeassessments of infrastructure."

Therefore, if the AAP is to meet the "soundness" test, then it should include the following policies and sub-text:

"PROPOSED POLICY - WATER AND SEWERAGE INFRASTRUCTURE CAPACITY:

Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where:

1. sufficient capacity already exists or
2. extra capacity can be provided in time to serve the development which will ensure that the environment and the amenities of local residents are not adversely affected.

When there is a capacity problem and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the developer funds appropriate improvements which will be completed prior to occupation of the development."

Text along the following lines should be added to the Core Strategy to support the above proposed Policy :

"PROPOSED SUPPORTING TEXT - The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is a capacity problem and no improvements are programmed by Thames Water, the Council will require

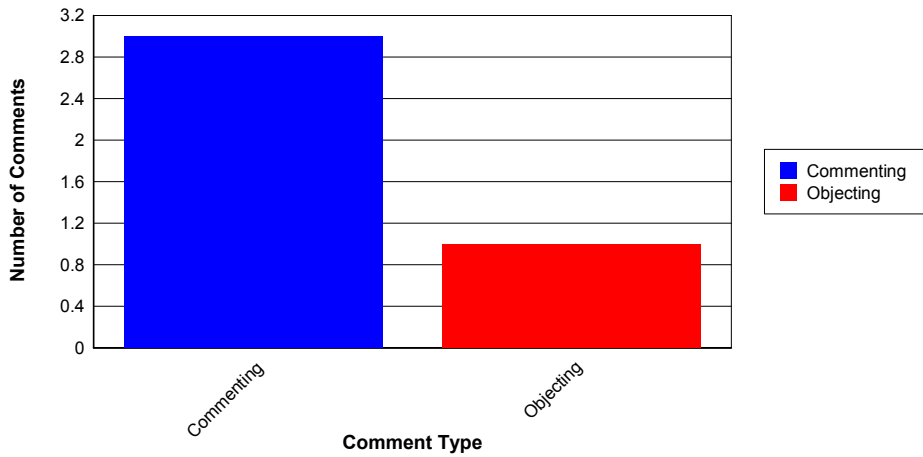
the developer to fund appropriate improvements which must be completed prior to occupation of the development.”

It is considered that the above policy/text accords with the guidance referred to above in PPS12 and the following:

Policy 4A.13 of The London Plan, February 2004, relates specifically to water and sewerage infrastructure and states: “The Mayor expects developers and LPAs to work together with water supply and sewerage companies to enable the inspection, repair and replacement of water supply and sewerage infrastructure, if required, during the construction of development. The Mayor will work with Thames Water, the Environment Agency and other relevant organisations to ensure that London’s drainage and sewerage infrastructure is sustainable.”

Policy 4A.11 of the London Plan relates to water supplies and states: “....In determining planning applications, the Mayor will and boroughs should have proper regard to the impact of these proposals on water demand and existing capacity.”

Summary



CAAP29 - Flood risk

The applicant will be required to establish whether a development site is located within a flood risk area and where necessary apply the sequential test.

In Flood Zone 3a (medium and high risk areas) development will only be permitted when assessed against the following criteria:

(a) Provision of a local flood risk assessment and adequate flood protection and mitigating measures on or off site;

(b) The design allows for protection from future flooding; and

(c) Where necessary contribute to the cost of works to provide, improve and maintain flood defences.

The use of planning obligations and conditions on planning permissions may be used in pursuit of this policy.

Respondent ID	Organisation	Nature of comment
ChAmEa30LoSE1 7TL	Environment Agency	Commenting

Comment

Flooding has implications for the Borough not only in terms of the constraint it places on the location of new development but also as an issue which sits with other 'climate change' related matters. For this reason it is preferable to have both strategic and detailed policies. A detailed policy on flooding is placed within this AAP because of its significant spatial implications in the Opportunity Areas. This proposed Policy will deal with a wide range of actions to reduce flood risk and is intentionally presented in a comprehensive manner to most clearly convey the Environment Agency and the Council's approach.

A significant area of both Lewisham and Catford Town centres lies in the floodplains of the River Ravensbourne and its tributaries. The Environment Agency Thames Catchment Flood Management Plan (Thames CFMP) (September 2006) confirms the above and sets out some main messages:-

- Flood defences cannot be built to protect everything.
- Localised defences might be developed.
- The ongoing cycle of development and urban regeneration is a crucial opportunity to manage flood risk.
- Land for future flood risk management will be identified and protected by authorities.

The Environment Agency is not objecting to the redevelopment of Lewisham town centre and is satisfied that development will not cause an increase in flood risk. A comprehensive approach to dealing with flooding and its risks has been followed to avoid adding to the risks to people and property and to seek to reduce the extent of flooding. A refined modeling submitted by the council and developers has removed a number of instabilities within the previous River Ravensbourne model which has improved its accuracy. This includes aspects such as a better demonstration of the way culverts respond to flood flows. Under the proposed scheme, the model shows that there is no raising or backing up of 1 in 100 year flood levels including an 20% allowance in peak river flows for climate change in the River Ravensbourne. There is a slight increase in water levels under the same scenario in the River Quaggy. However, there is sufficient freeboard (safety factor) from peak water levels to surrounding ground levels for us to be confident that flood risk is not increased as a result of the proposals.

Removing the existing flood risk from people and property by relocating development is not always a realistic option because of the enormous costs and lack of alternative land outside the flood risk area. A sequential approach of ensuring new development is only in areas not at flood risk would on its own fail to deal with the risks faced by those already living or having businesses in flood risk areas. A pragmatic application of sequential approach to new development would realise the opportunity identified in the Thames CFMP and PPS25 to use development as a way to help manage and reduce flood risk. It would ensure that the continued role of the Town Centres in particular, as a sustainable and accessible location for many facilities including as major shopping centres, could be fully maintained to meet the needs of local residents.

The proposed policy also seeks to ensure the capacity of the flood plain is both preserved, and, where possible, through appropriate development, increased and impedance to the flow of floodwater is, if possible, reduced. Redevelopment of existing developed sites in flood risk areas for less vulnerable uses will be supported where they achieve reductions in flood risk through increased flood storage capacity and reduced impedance to flood water flow. Account is taken in the policy of the impact of climate change by highly vulnerable uses not being permitted in the 1 in 1000 (Zone 2) flood area and development in this area otherwise being required to be flood resistant/resilient. More stringent controls on development are made in the 1 in 20 flood risk area (Zone 3b) (referred to in PPS25 as 'functional flood plain') These are areas of generally fast flowing floodwater in major flood events where there are particular risks to people and property.

All applications covered by the provisions of the policy will require an appropriate Flood Risk Assessment. This includes sites over 0.5ha, or 10 dwellings or more or over 1000 m² of non-residential development outside the 1;1000 flood risk area in Zone 1 because surface water flooding into the flood plain from outside it can contribute to flood risk. The extent of the 1 in 20 (Zone 3b), 1 in 100 (Zone 3a) and 1 in 1000/ (100+20% for climate change)

(Zone 2) where the SFRA will indicate.

Respondent ID	Organisation	Nature of comment
ChAmEa30LoSE1 7TL	Environment Agency	Commenting

Comment

Flood Alleviation Scheme

The Environment Agency and other key delivery partners are currently progressing a plan on a major capital scheme to reduce flood risk in Lewisham. This involves the development of a "River Corridor Improvement Plan" for a reach of the Ravensbourne from Ladywell Fields to the confluence of the River Thames. This improvement plan will help ensure the principles of 'making space for water' are maximised and proposed future developments (regeneration) fit into a spatial improvement plan. We propose that this Plan be owned and branded by the London Borough of Lewisham. This river corridor improvement plan shall be put together in conjunction with a professional land agent to address the land ownership issues and the London Borough of Lewisham to address proposed development sites and issues. It is envisaged that there will also be consultation with developers, river user groups and environmental pressure groups to help ensure the benefits of consultation are maximised as well as identify opportunities for collaborative working.

This Plan will tie-in with the proposed EU Interreg IVb Urban Rivers for Urban Renewal Project and will serve as the foundation for implementing (constructing) the Ravensbourne at Deptford Flood Alleviation Scheme. This flood alleviation scheme is proposed to reduce the risks of flooding to 500+ properties within Lewisham and is also the proposed match funding for the EU Interreg IVb project bid.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Commenting

Comment

The areas around the river Ravensbourne include flood zone 3. Development within these areas will require a Flood Risk Assessment in line with PPS25. It may be advisable to include proposals that will generate an increase in the flood plain to improve the ability to store flood water and thereby actively reduce flood risk in other parts of the borough.

Respondent ID	Organisation	Nature of comment
NiFi9 LoW1U 1HL	St Modwen Developments Limited	Commenting

Comment

Catford Shopping Centre falls partly within a defined flood risk area and under the terms of Policy CAAP29, in tandem with the Environment Agency, flood risk assessment and mitigation measures will be required. This however should not put inequitable burden on the redevelopment of a sequentially preferable site which has an existing dense form of development, in order to fund flood prevention measure that should be funded from wider sources

Respondent ID	Organisation	Nature of comment
ChAmEa30LoSE1 7TL	Environment Agency	Objecting

Comment

Proposed Policy – Flooding

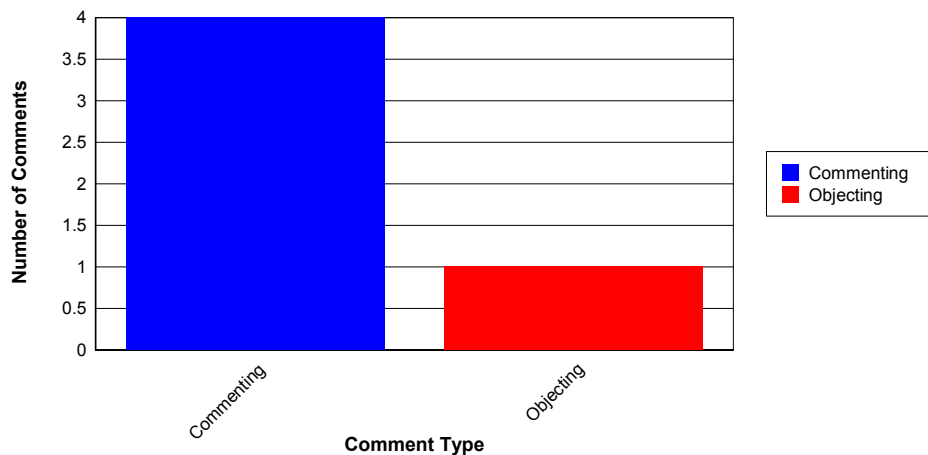
The Council will seek to reduce flood risk and its adverse effects on people and property in Lewisham and Catford Town Centres by:

- a) appropriate comprehensive flood risk management measures within or affecting the Town Centres which are agreed by the Environment Agency,
- b) reducing the risk of flooding from surface water and its contribution to fluvial flooding by requiring all developments of one or more dwellings and all other development over 500m² of floor space in the Town Centres to have appropriate sustainable drainage schemes, Floor levels for the buildings will be set at a minimum level of the 1 in 100 year flood level plus climate change allowance with an additional 300mm 'freeboard' added to that level.
- c) maintaining flood storage capacity within flood Zone 3 by refusing any form of development on undeveloped sites which reduces flood storage capacity or impedes the flow of flood water
- d) maintaining the effectiveness of the more frequently flooded area (Zone 3b) of the flood plain to both store water and allow the movement of fast flowing water by not permitting any additional development including extensions,
- e) not permitting residential development or change of use or other 'more vulnerable' uses within Zone 3a or 'highly vulnerable uses' within Zone 2 where flood risks cannot be overcome.
- f) supporting the redevelopment of existing developed sites in the Town Centre in Zones 3a and 3b for 'less vulnerable' uses where:
 - i. a minimum increase of flood storage capacity of 20% can be secured (all flood storage areas to be effective at all times throughout the life time of the structure/use and do not create unacceptable risks to people in times of flood)
 - ii. reduces impedance to the flow of flood water where there would be flowing flood water
 - iii. appropriate access for the maintenance of water courses is maintained

- iv. no adverse impact on the integrity and effectiveness of flood defence structures
- g) requiring any development in Zones 2, 3a and 3b to be designed to be flood resilient/resistant.
- h) requiring all development proposals within Zones 2, 3a and 3b, and development outside this area (Zone 1) on sites of 0.5ha or of 10 dwellings or 1000 m2 of non-residential development or more, to be supported by an appropriate Flood Risk Assessment.

Existing riverside access will be maintained and opportunities will be sought to improve access in conjunction with developments in riverside locations.

Summary



CAAP30 - Sustainable urban drainage systems (SUDS)

The Council will require applicants to demonstrate how surface water run-off is managed as close to its source as possible. The use of sustainable urban drainage systems will be encouraged for all developments. Preference will be given to proposals that ensure that adequate water resources are available and that:

Minimise the use of treated water

Maximise rainwater harvesting opportunities

Incorporate grey water recycling systems.

The Council will require proposals for developments on brownfield sites with a floor space of 1000m², or ten or more residential units to demonstrate through calculations that the rate of run-off of surface water from the site is less than the conditions before development.

Respondent ID	Organisation	Nature of comment
ChAmEa30LoSE1 7TL	Environment Agency	Commenting

Comment

Planning for SUDS early in a project's design is essential to enable integration of the system into the overall site concept and layout, and agreement on adoption, maintenance and operation of the systems. For good practice, this draft policy should be informed by the following:

Apartments

- In high-density developments there is likely to be insufficient space for balance ponds or infiltration basins. The most suitable approach may be to use modular cellular storm water tanks that provide large holding capacities for infiltration. These can be located under parking courts, service areas or landscaping and combined with permeable hard surfaces

- Roof water run off can also be mitigated by use of rainwater harvesting (which can be stored for uses such as w.c. flushing and irrigation), and by the use of green roofs which can reduce run off by 50% or more

Medium Sized Housing

- Water butts installed on rainwater down pipes provide a simple contribution towards reducing storm water run off.

- Where ground conditions are appropriate, surplus water can be directed to soakaways.

- Community SUDS schemes, with run off collected from a number of houses and directed to a basin or balanced pond (discharge to a water course or mains drain via a hydrobrake) can provide an attractive landscape and wildlife feature

- Permeable paving for driveways, access roads and parking areas

Large Housing

- Water butts should be installed on rain water down pipes

- In lower density developments there is likely to be more space available for some SUDS features, such as soakaways, swales and infiltration basins

- Large driveways and parking areas should be surfaced with permeable paving, or constructed to drain to adjoining soft surfaces. Using permeable paving will benefit the future growth of mature trees by maximising the area of soil moisture recharge

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Commenting

Comment

Comment: The emphasis on SUDs is supported although the draft Further Alterations to the London Plan introduce the sustainable drainage hierarchy policy 4A.5vii, which should be reflected in the AAP.

Respondent ID	Organisation	Nature of comment
GeCoCIVaReBeRG1 8DB	Thames Water Property Services	Objecting

Comment

With regard to surface water drainage, it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding and this should be clearly stated in the AAP.

Thames Water recognises the environmental and economic benefits of surface water source control, and encourages its appropriate application, where it is to the overall benefit of our customers. However, it should be clearly recognised in the AAP that SUDS are not appropriate in all circumstances e.g. soakaways will not be appropriate in non free draining areas.

In the disposal of surface water, Thames Water will,

- a) Seek to ensure that new connections to the public sewerage system do not pose an unacceptable threat of surcharge, flooding or pollution;
- b) Check the proposals are in line with Government advice which encourages, wherever practicable, disposal 'on site' without recourse to the public sewerage system; for example in the form of soakaways or infiltration areas on

free draining soils; and

c) Require the separation of foul and surface water sewerage on all new developments.

Respondent ID

NiFi9 LoW1U 1HL

Organisation

St Modwen Developments Limited

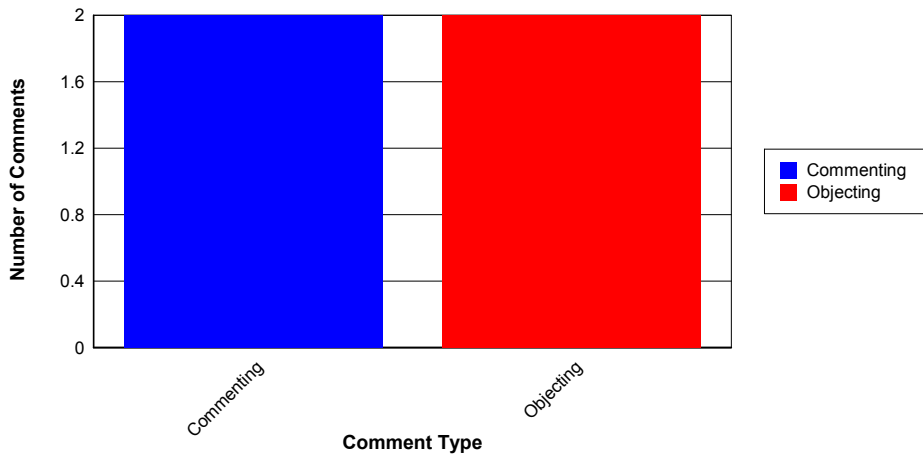
Nature of comment

Objecting

Comment

Policy CAAP30 is overly onerous in seeking that less water run off should result post redevelopment of a site. While reduction may result from more sustainable construction methods and the use of green roofs, a development may change the run off patterns in such a way that reduction is not possible.

Summary



CAAP31 - Air Quality

The Council will require development proposals to take air quality into account with other material considerations, and provide an air quality assessment where considered appropriate by the Council. Where necessary the development proposal will be required to provide appropriate mitigation measures which will be implemented by a condition or planning obligation (s106 agreement).

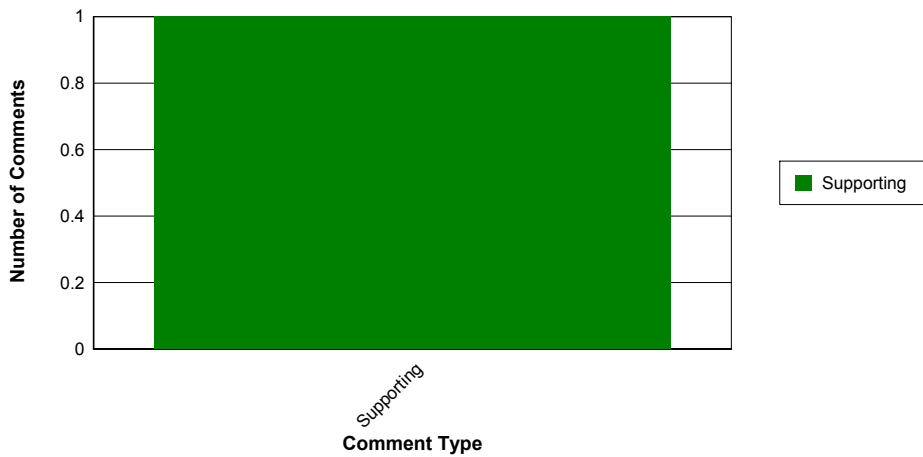
Respondent ID
GiDoCiThLoSE1 2AA

Organisation
Greater London Authority

Nature of comment
Supporting

Comment
Supported.

Summary



CAAP33 - Noise and vibration

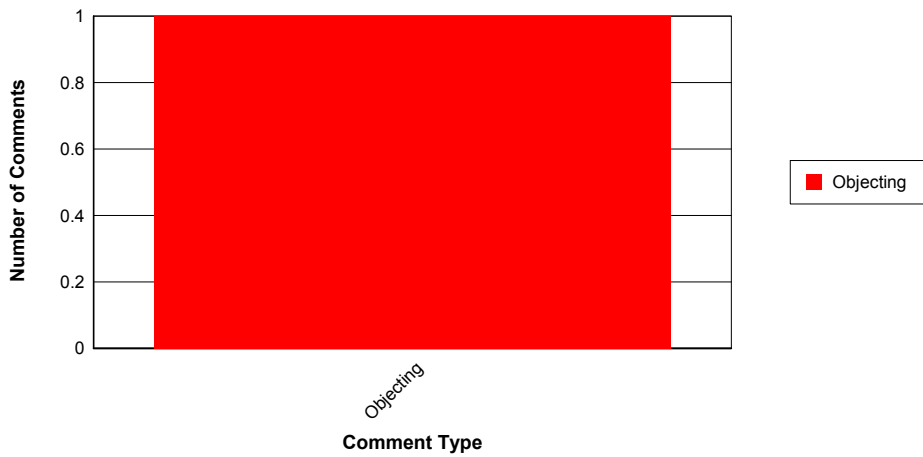
Where noise and vibration-sensitive development is proposed close to an existing source, or when a noise and vibration generating development is proposed, a detailed noise and vibration impact survey will be required outlining possible attenuation measures.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Objecting

Comment

Object: The policy needs to be expanded to be in conformity with LP 4A.14 policy on noise – in particular, requiring noise sensitive development to be separated from major sources of noise wherever practicable. "Attenuation measures" does not adequately address this. (CAAP33 compounds the problem of non-conformity in the proposed Core Strategy and Development Control Policies highlighted previously).

Summary



CAAP34 - Light attenuation

Proposals for light-generating development, floodlights or otherwise obtrusive lighting will be required to be accompanied by a detailed light-impact survey outlining possible attenuation measures.

Respondent ID
GiDoCiThLoSE1 2AA

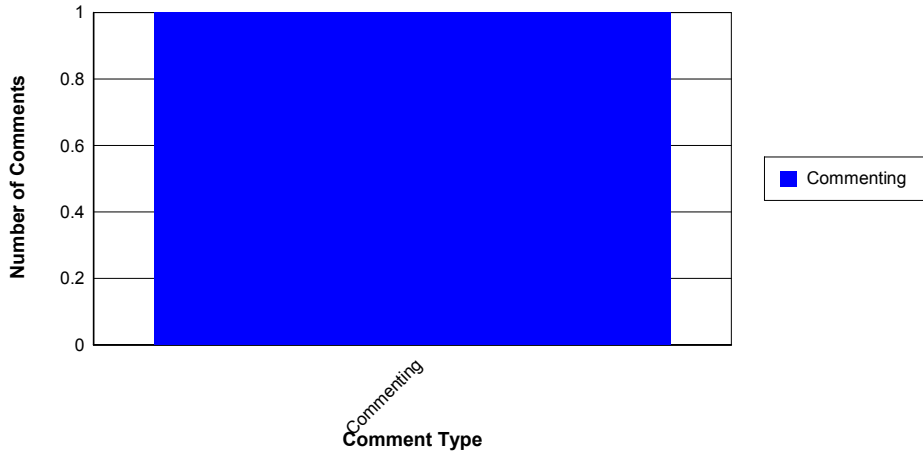
Organisation
Greater London Authority

Nature of comment
Commenting

Comment

Comment: The principle of the development is supported. However, the Council should proactively seek the use of energy efficient lighting. This is a Mayor's Essential Standard in the Sustainable Design and Construction SPG.

Summary



CAAP35 - Construction waste and aggregates

Developments will be required to demonstrate how they will contribute towards reducing and recycling construction, demolition and excavation waste. Information on these measures must be submitted with an application.

The Council will require that new developments over 1000m², or 10 dwellings should submit and implement a site waste management plan to minimise the disposal of wastes to landfill, by reducing waste of materials on site and promoting reuse, segregation, recycling and composting of wastes that arise. The waste management plan is required to evaluate what level of reuse and recycling is possible and set targets for materials diverted from landfill.

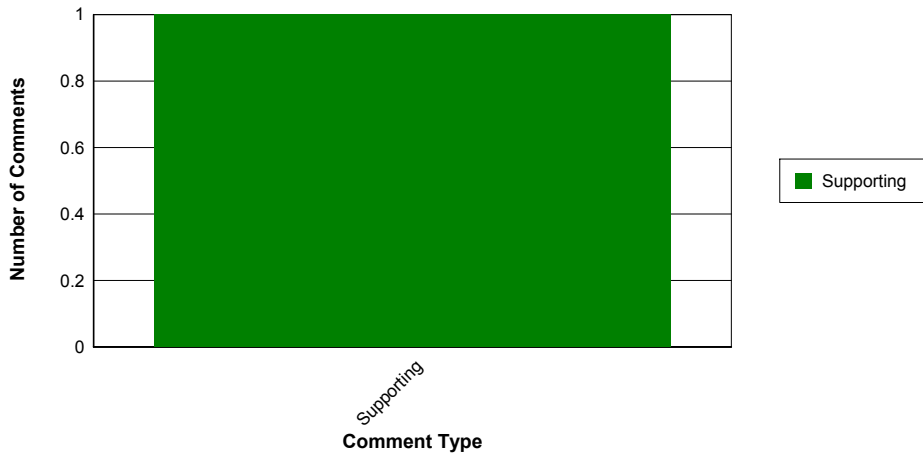
Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment

Support: This draft policy is in Line with New Policy 5 in the London Plan and with Proposal 19 of the Mayor's Draft Business Waste Strategy.

The requirement for developers to produce site waste management plans (SWMPs) as a means of promoting sustainable construction is supported. Lewisham should however take the opportunity to establish best practice and encourage SWMP's for all development (including those valued under 1000m², or ten dwellings). The level of detail required by the SWMP however should differ based on the size and value of the project. SWMP's should identify quantities and types of construction waste, demonstrate how off site proposal of waste will be managed, identify better segregation for recovery of construction waste that is hazardous and reduce the amount of waste sent to landfill. Lewisham should ensure that where appropriate the same sustainability principles are used to assess planning applications.

Summary



CAAP36 - Construction materials

The Council will require:

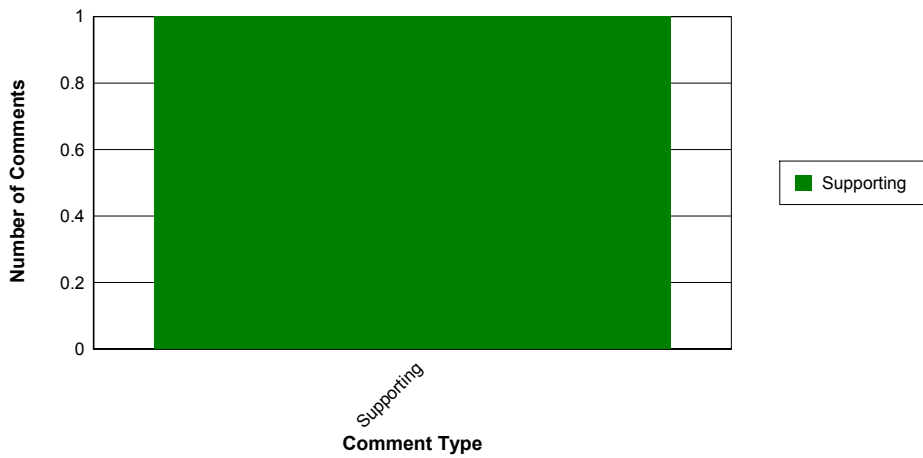
- (a) All development proposals to demonstrate how they intend to contribute towards using construction materials from sustainable resources, and use recycled and reused materials;
- (b) All major developments of 1000 square metres or more, or 10 residential dwellings or more, to source at least 10% of the total value of materials used from recycled and reused materials; and
- (c) Any development which requires the demolition of an existing building to recycle and/or reuse reclaimed materials for the proposed development.

The Developer will be expected to follow the principles and procedures from the ICE Demolition Protocol.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment
Supported

Summary



CAAP37 - Residential waste facilities

The Council will require all new residential developments to provide sufficient waste storage and recycling facilities.

Planning applications for residential developments will consider the following:

The provision of facilities to recycle or compost household waste by means of a separated dedicated storage space.

Appropriate siting of waste storage and recycling facilities within the development, visual screening and health and safety precautions.

Requirements for planning obligations will be used in pursuit of this policy

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment

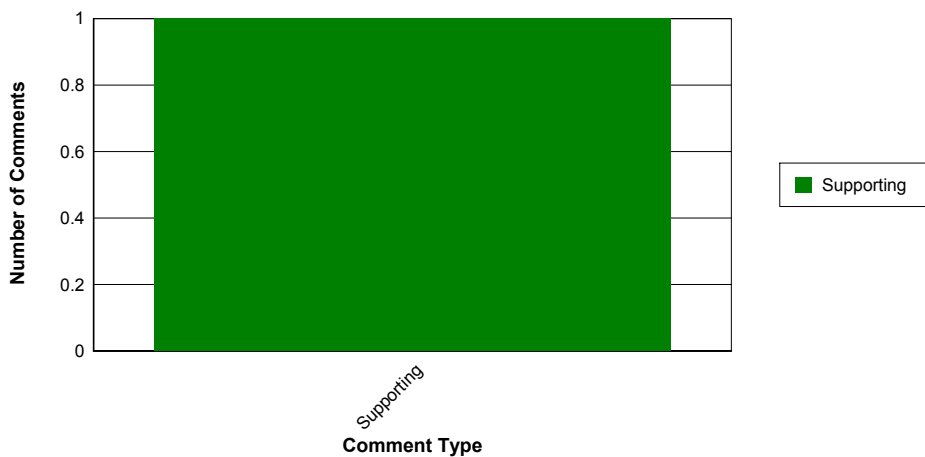
Support: Policy 4A.2 of the London Plan requires the provision of suitable waste and recycling storage facilities in all new developments (including residential developments). This policy could be usefully expanded with more information.

All storage areas should be demarcated and clearly signed. Waste and recycling areas should be encased and if necessary, screened from view while remaining easily accessible. Access to recycling facilities should be as easy as to waste facilities. Storage capacity should be capable of meeting and exceeding the London Plan household recycling targets of 30% recycling by 2010 and 33% by 2015. The design of new developments also needs to ensure waste storage areas are adaptable so that they are capable of meeting future higher recycling standards.

Storage requirements include storage bins in kitchens and in local shared recycling facilities at a rate of one site per 500 persons as well as facilities for kerbside collection. For blocks of flats or apartments, recycling storage facilities should be provided on each floor. Where possible designs for properties with gardens or landscaped spaces, should include storage space for composting facilities.

The location of waste storage and recycling facilities in new developments should allow consideration of vehicular access to the site for waste collection vehicles and its potential noise impact.

Summary



CAAP38 - Waste facilities in commercial and large scale development

The Council will require all new commercial/business operations to provide designated space for waste storage and recycling facilities, and to demonstrate how they will contribute towards reducing operational waste and increasing segregation and recycling of waste.

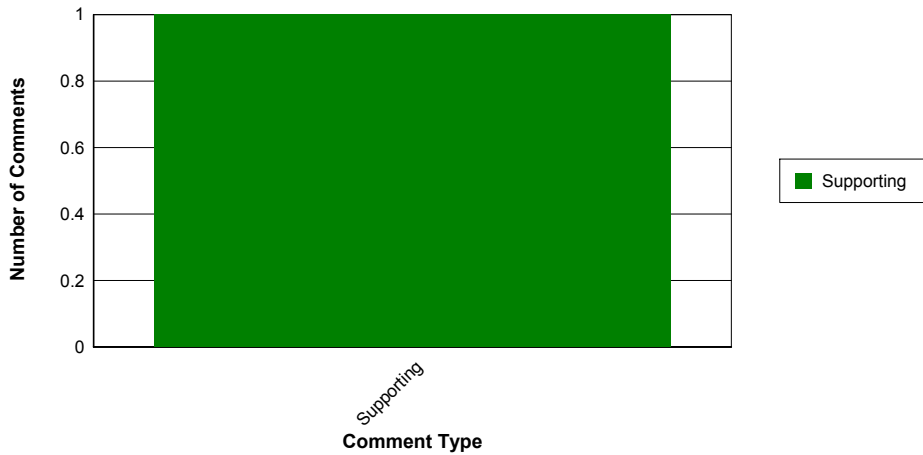
Applicants proposing large-scale developments or developments that employ or attract a large number of people, such as supermarkets or industrial units, should provide appropriately designed facilities for the collection for recycling or re-use of the waste that they, their customers or the staff generate. Applicants should submit a comprehensive waste and recycling management strategy.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment

Support: Policy 4A.2 of the London Plan requires the provision of suitable waste and recycling storage facilities in all new developments (including commercial and large scale developments). As above, this policy could be usefully expanded with similar information to guide future developers.

Summary



CAAP39 - Housing provision

The Council will expect major development in the town centre to include residential uses as part of any redevelopment scheme subject to:

- (a) An appropriate housing mix in both size and tenure, including the provision of larger units suitable for family accommodation; and
- (b) Where housing currently exists on a site, any redevelopment results in the overall provision of the same or more housing on the site.

Suitable sites will include:

- (a) The five development opportunity sites as identified in the Opportunity Area/Site Allocations policies and on the Proposals Map; and
- (b) The conversion of existing buildings in the town centre, particularly premises above shops, subject to considerations of residential amenity and a separate and secure entrance being provided for the new housing created.

Respondent ID	Organisation	Nature of comment
NiFi9 LoW1U 1HL	St Modwen Developments Limited	Commenting

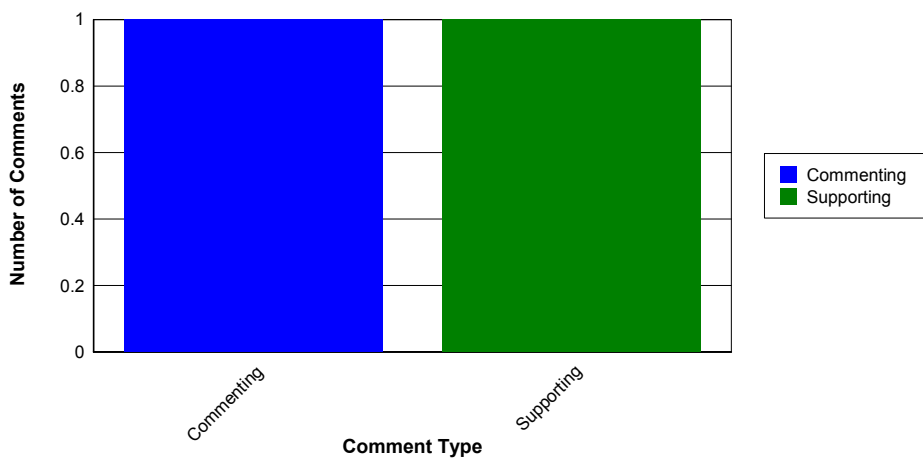
Comment

We support the need to introduce a range of tenures in housing development, the support for taller buildings and increasing residential provision when sites are redeveloped. At Policy CAAP39 further consideration should be given to whether larger family units are appropriate in the densest mixed use town centre developments. We would suggest that they are not when amenity and general space is limited and there are high levels of communal activity at ground floor from the evening economy and the servicing of businesses.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment
Supported

Summary



CAAP40 - Housing design

Housing design should be of an outstanding architectural quality when compared to both existing development in Catford and the best new buildings in London. Particular attention should be made to significant view lines.

Respondent ID

GiDoCiThLoSE1 2AA

Organisation

Greater London Authority

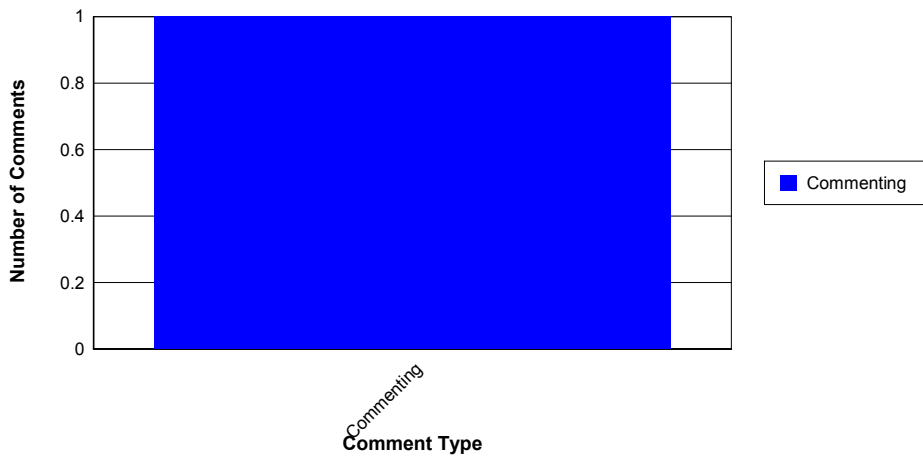
Nature of comment

Commenting

Comment

Comment: This policy could usefully be expanded to promote inclusive design, as well as design. In addition, developers should be encouraged to use innovative ways to include children's play space in residential developments.

Summary



CAAP41 - Lifetime Homes Standards

All new residential dwellings should be built to Lifetime Homes Standards and 10% of all new dwellings should be wheelchair accessible or easily adapted for those using a wheelchair. This includes all new build, conversions and flatted development.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Objecting

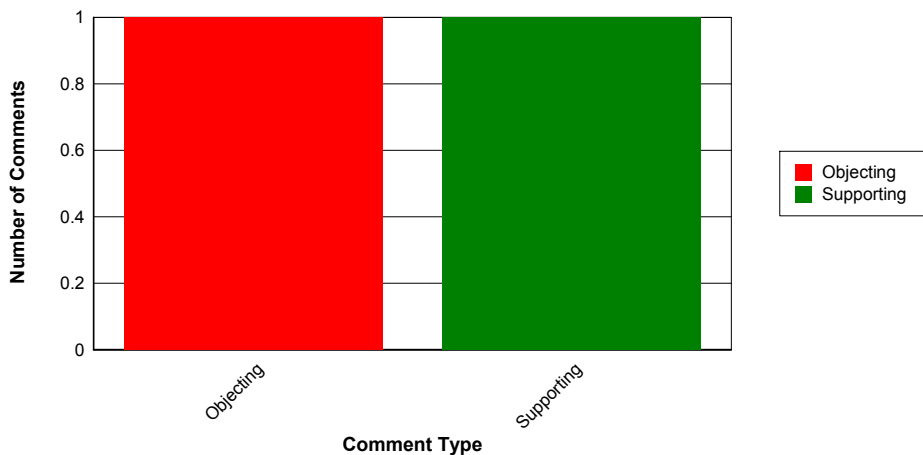
Comment

The Catford AAP explicitly requires that all residential development be built to Lifetime Homes standards, and that 10% be wheelchair accessible, or easily adaptable. Lewisham AAP does not include this requirement. It is acknowledged that the Development Policies DPD includes the requirement for Lifetime Homes and wheelchair homes, in accordance with London Plan Policy, however this differing approach may cause confusion. This issue is also raised with regard to renewable energy and sustainability. The GLA would welcome further discussion with the Council regarding this issue.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment
Supported.

Summary



CAAP42 - Affordable Housing: Thresholds and Amount

Where a development site is capable of accommodating 10 or more dwellings or is 0.3 hectares or more in size, the Council will seek to secure 35% of new private residential build as affordable housing. The use of planning obligations and conditions on planning permissions may be used in pursuit of this policy.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Objecting

Comment

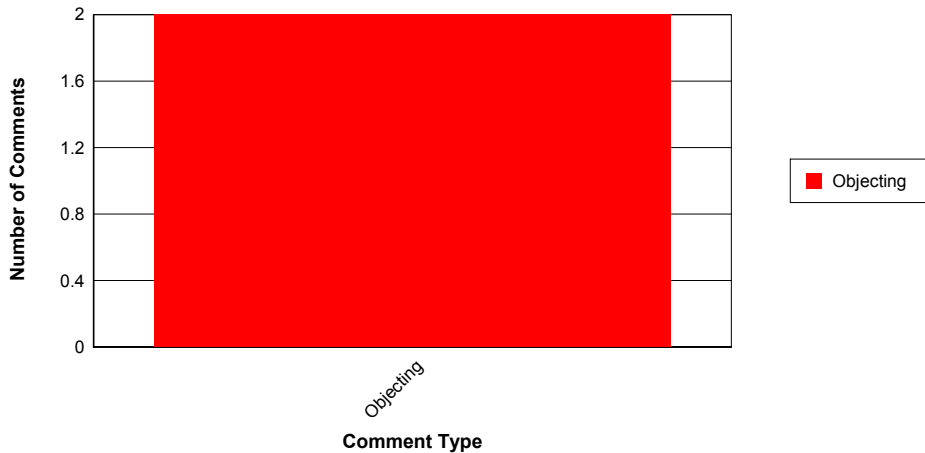
Both AAPs mirror the Development Policies approach to affordable housing, and include a 35% affordable housing target. As stated by the Mayor previously this approach is not supported and is considered not in general conformity. It is acknowledged however that discussions are ongoing between GLA officers and the Council regarding this matter, and it is hoped that a successful conclusion can be met.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Objecting

Comment

Object: As raised previously with the Council, the borough-wide target of 35% affordable housing is not acceptable. It is acknowledged that discussions on this issue are ongoing.

Summary



CAAP43 - Affordable Housing: Tenure

The required affordable housing tenure mix will be 70% social rented and 30% intermediate provision delivered across private sites. Developer's would be required to demonstrate a mechanism for retaining affordable housing in perpetuity.

The use of planning obligations and conditions on planning permissions may be used in pursuit of this policy.

Respondent ID	Organisation	Nature of comment
NiFi9 LoW1U 1HL	St Modwen Developments Limited	Objecting

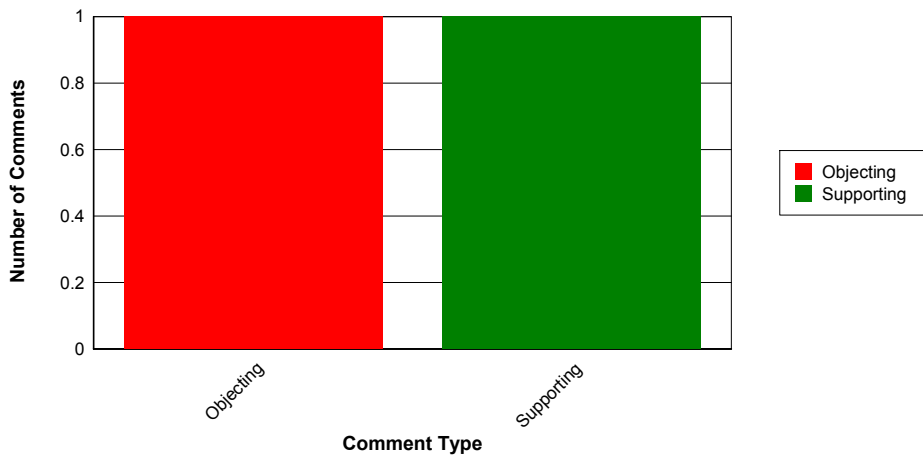
Comment

Policy CAAP43 regarding tenure mix should not be contrary to draft Policy H5 of the Development Polices LDF document that seeks to achieve balanced and mixed communities in areas with an existing high concentration of social rented, through the introduction of flexible tenures and shared ownership.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment Supported.

Summary



CAAP45 - Existing community uses

The loss of buildings used for community uses/purposes will not be considered acceptable unless it can be shown there is no longer a demand for the service.

Should the loss of buildings involve a relocation of the facilities, then this will need to be established prior to another use being permitted at the facility to be closed or on land where the facility is located.

Respondent ID	Organisation	Nature of comment
NiFi9 LoW1U 1HL	St Modwen Developments Limited	Objecting

Comment

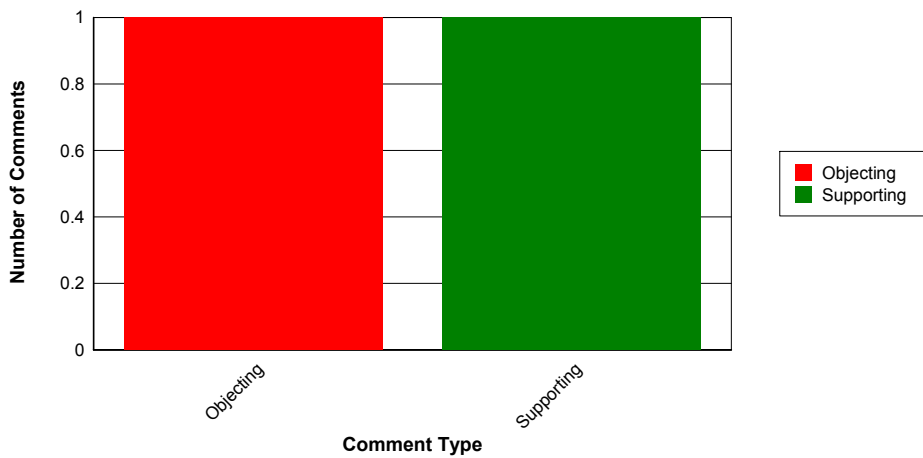
Policy CAAP45 regarding the need to retain community uses/services where there is a demand, should not extend to properties where this use has ceased and the property is vacant.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment

Supported.

Summary



CAAP46 - New community uses

The Council will work in partnership with appropriate community service providers to ensure that health, education and community service needs arising from a development are provided for.

The use of planning obligations and conditions on planning permissions may be used in pursuit of this policy.

Respondent ID	Organisation	Nature of comment
MaRoMo26LoEC1A 2AT	Metropolitan Police Authority	Objecting

Comment

Section 4.8 Community, relates to the provision of community facilities and infrastructure in Catford Town Centre. The section does not specifically refer to policing, but refers to a number of relevant policies including CAAP46. Policy CAAP46 refers to new Community Uses and states "the Council will work in partnership with appropriate community service providers to ensure the health, education and community service needs arising from a development are provided for. The use of planning obligations and conditions on planning permissions may be used in pursuit of this policy."

The provision of effective policing is of crucial importance across London to ensure safe environments are created consistent with national planning policy guidance in Planning Policy Statement 1 (PPS1). Paragraph 16 of PPS1 states that development plans should promote development that creates socially inclusive communities. It specifically states plan policies should ensure:

- a) the impact of development on the social fabric of communities is considered and taken into account;
- b) safe, healthy and attractive places to live are delivered.

At a strategic level, paragraph 3.76 of the London Plan recognises the importance of initiatives relating to policing and community safety and crime reduction in improving the quality of life of many Londoners.

Given the policy content above, it is important to recognise the role of the police within the provision of community infrastructure and this should be reflected within relevant planning policy documentation.

Suggested Alteration

Policy CAAP46 -New Community Uses, should be altered to read:-

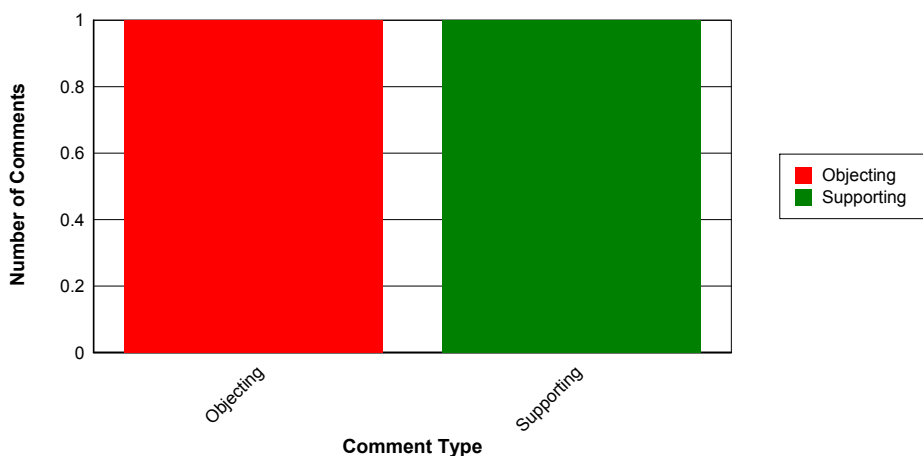
'The Council will work in partnership with appropriate community service providers to ensure that health, education, policing and community services needs arising from a development are provided for.

'The use of planning obligations and conditions permissions may be used in pursuit of this policy'.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment
Supported.

Summary



CAAP47 - Major developments

The Council may require major developments to prepare a Social Impact Report to assess the community service needs arising from a proposal.

Major development should also contribute to education and training by incorporating schemes as part of their construction and on-going operations. This may involve one or more of the following:

- (a) Employment opportunities and training schemes for local people in construction related industries associated with the development;
- (b) Employment of local people in the on-going enterprise; and/or
- (c) The development of training programmes (from small-scale work-experience type activities through to formal educational programmes) associated with the on-going enterprise.

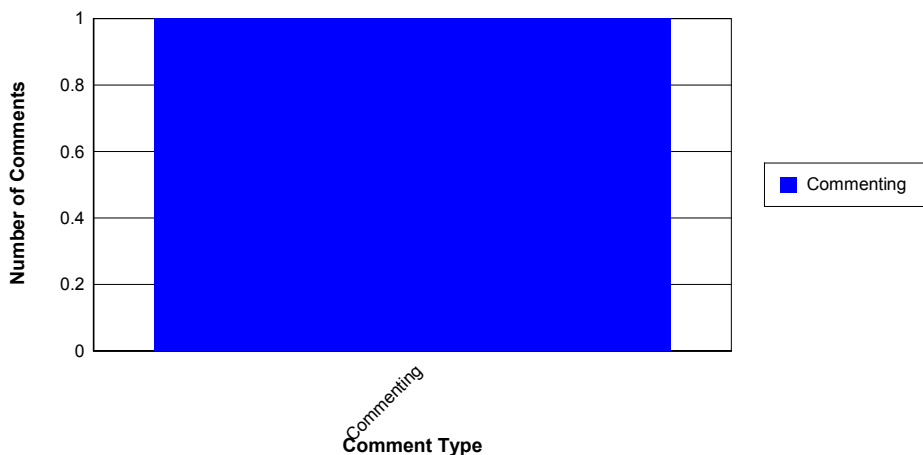
The use of planning obligations and conditions on planning permissions may be used in pursuit of this policy.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Commenting

Comment

Comment: The principle of the policy is supported. In accordance with London Plan Policy 6A.4 employment and training schemes should also include provision or contribution towards childcare. This will assist with removing barriers to employment for local people.

Summary



CAAP48 - Flexible community spaces

The Council recognises the need for the provision of flexible community spaces in the town centre, and is supportive of the inclusion of such space within any redevelopment proposal.

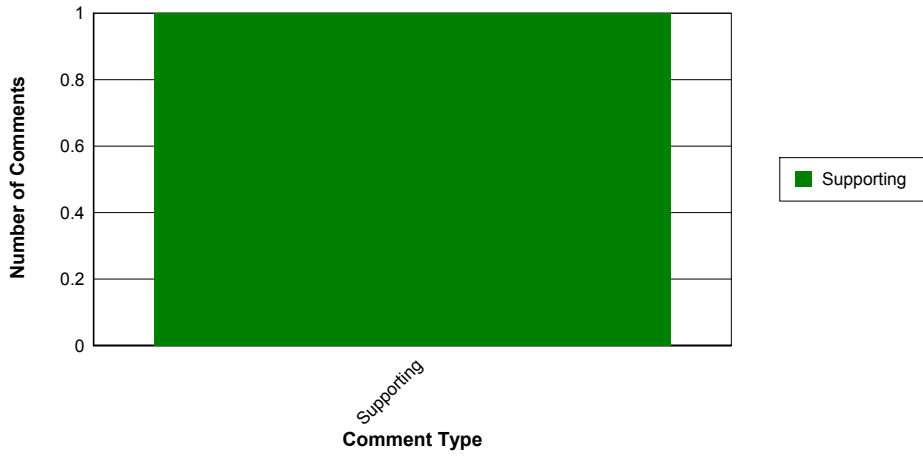
Respondent ID
GiDoCiThLoSE1 2AA

Organisation
Greater London Authority

Nature of comment
Supporting

Comment
Supported.

Summary



Development Opportunity Site1 - Catford Shopping Centre and Milford Towers

The Council will require a comprehensive master plan for the redevelopment of the Catford Shopping Centre and Milford Towers site, which should be considered in association with the Civic Quarter and South Circular (A 05) site and the Plassy Road island site.

The site is the core retail area of the town centre and is allocated for a mix of retail (A , A , A3, A4, A5), residential (C3), business (B a), community (D), and leisure (D) uses.

Development proposals will need to provide:

- a) A strengthened and enhanced Core Shopping Area, which is the focus for retail activity in the town centre, of which at least 70% are shop (A) uses;
- b) Integration of the site to its town centre surrounds through improved access and permeability, particularly improved pedestrian links to Rushey Green high street and Catford Broadway;
- c) An appealing shopping environment with quality shop frontages;
- d) A new triangular retail circuit to link Rushey Green high street with Catford Broadway via a pedestrianised mall through the site;
- e) A redeveloped supermarket that provides ground floor retail space, basement car parking and is integrated at ground level with other uses in the Core Shopping Area;
- f) A public realm designed to encourage pedestrian activity, using high quality materials, including street trees, seating, public art and good lighting;
- g) Improved pedestrian access from Holbeach Road for existing residents and future residents of the Greyhound stadium area;
- h) 'Animated' street frontage on the main routes around and through the site and buildings that address the street, including Thomas Lane and Holbeach Road;
- i) Retention of the buildings along Catford Broadway or new buildings that match the grain and scale of existing buildings;
- j) High quality housing to 2010 Decent Home standard or equivalent, where the overall number of residential units is equal or greater than what currently exists;
- k) An improved and consolidated street market;
- l) Improved and better located bus facilities; and
- m) An assessment of the flood risk.

The policy requirements and design principles are illustrated on Figure 6. [See map]

Respondent ID	Organisation	Nature of comment
DuMa10LoW1J 8JR	Tesco Stores Ltd	Commenting

Comment

Tesco welcome inclusion within Policy 5.1.6 of the need to include a redeveloped supermarket within any redevelopment of the Catford Centre. However, ahead of detailed design work and viability testing we consider the parameters to development unnecessarily prescriptive. Tesco' preference is for ground floor retailing. However, basement parking is generally highly expensive, to the extent that it often prejudices the viability of development projects. Equally, it is Tesco's experience that customers prefer ground floor parking with open ventilation where possible. This will be an important consideration when seeking to enhance Catford's appeal relative to competing retail destinations. On this basis policy should simply acknowledge a need for complimentary parking allowing the Council to assess any future scheme on its merits once the developers are confident the proposals are deliverable.

Respondent ID	Organisation	Nature of comment
DuMa10LoW1J 8JR	Tesco Stores Ltd	Commenting

Comment

Having regard to the block plan of how the site might be redeveloped, included at page 41, the Council should make clear that this is indicative so as not to prejudice future design evolution. We agree with the underlying principles and support the need to create animated shop frontages and strong pedestrian flows through the site. However, we are unsure of both the need for any significant entrance from the development to the north and for active frontages along Holbeach Road, to the north and Thomas Lane, to the east.

It is important that any development is fully integrated with surrounding uses and that any development is sensitive to the visual amenity of the surrounding residential areas. Equally the development needs to design in natural surveillance and encourage strong pedestrian movements. However, this needs to be balanced against the need to safeguard the character of the residential areas and the commercial requirements of operators in the Catford Centre. The term 'active frontages' suggests the need for shop frontages which commercially are very difficult to provide off the prime thoroughfares. Equally, whilst it will need to be handled carefully there will be a need to service a new supermarket along one of these frontages. In this instance we suggest that policy highlight the need to treat the surrounding residential amenity sensitively allowing flexibility for the development team to review development options which can then be assessed on their merits.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Commenting
Comment		
Comment: As discussed in response to preferred policy CAAP25, large sites coming forward within the town centre should be supporting the principles of decentralised energy. This approach should seek to connect as much built development to gain the maximum efficiencies and be subject to a sperate policy, but could also be usefully included here as a specific requirement.		
Respondent ID	Organisation	Nature of comment
NiFi9 LoW1U 1HL	St Modwen Developments Limited	Commenting
Comment		
A key element of the scheme will be the redevelopment of Milford Towers and their replacement with a new residential scheme. It is vital that this provides a more sustainable mix of private, affordable, part-ownership and social-rented accommodation. An early decision on the future of the Milford Towers will assist in bringing forward a redevelopment of the overall scheme.		
Respondent ID	Organisation	Nature of comment
J Pa5 CuCaLoSE6 2LE		Objecting
Comment		
re: Figure 6 page 41. I am dismayed at the 'pedestrian priority' between the Civic Centre and Laurence house (north side) and consider this a missed opportunity for bus only lanes. Buses could be segregated from through traffic on the A205 making it much safer for all pedestrians to travel and shop. We are already being encouraged to use public transport and discouraged from using cars.		
The bus waiting area 'K' in Rushey Green (northwards to Lewisham) is sited on a busy corner with Catford .Broadway. The frontage comprises a bank with two ATM's, Building Society also with ATM and shops to Winslade Way. There is a bus stop for routes 75 and 185- This pavement is always busy during daytime and I believe it would be a danger to pedestrians and traffic alike if more buses were scheduled to stop at this venue. At least 6 other bus routes currently stop outside the Theatre where there is more room.		
Respondent ID	Organisation	Nature of comment
NiFi9 LoW1U 1HL	St Modwen Developments Limited	Objecting
Comment		
At paragraph 5.1.3 regarding the constraints for redevelopment, the mention of water capacity should be further expanded. The need to bring Milford Towers up to 2010 decent home standards through refurbishment or complete redevelopment is an opportunity and should not be listed here as a constraint.		
Respondent ID	Organisation	Nature of comment
NiFi9 LoW1U 1HL	St Modwen Developments Limited	Objecting
Comment		
1.9 At point h) there is major concern that animated frontages are sought to the rear of the scheme fronting Thomas Lane and Holbeach Road. Rear servicing and storage areas need to be accommodated within the scheme and the destination is well served by the other access points. Thomas Lane in particular does not need this treatment as it is akin to a service road with only the rear gardens of Nelgarde Road fronting the site. Thomas Lane offers the best alternative as a route for service vehicles and the car park traffic. Requiring active frontage along Thomas Lane will severely constrain the development options, additionally, the illustrated plan shows an access route to Thomas Lane which is not required in order to achieve any of the schemes objectives. Pedestrians approaching the centre from Catford Road will be highly unlikely to divert up Thomas Lane rather than entering the centre from the Catford Broadway, whilst pedestrians approaching from Holbeach Road will be almost certain to use the new Holbeach Road entrance. A pedestrian route from the centre of the scheme to Thomas lane would draw insufficient footfall to attract retailers or to ensure a sense of security for those choosing to use it.		
Respondent ID	Organisation	Nature of comment
DuMa10LoW1J 8JR	Tesco Stores Ltd	Supporting
Comment		
We support designation of the Catford Shopping Centre and Milford Towers as a 'critically important' development opportunity within Catford Town Centre. We also agree that the site offers a prime opportunity to create a more appealing shopping environment and as such is central to the regeneration of the town centre. In order to allow all development options for the site to be fully consider it is important the policy		
Respondent ID	Organisation	Nature of comment
NiFi9 LoW1U 1HL	St Modwen Developments Limited	Supporting
Comment		
We welcome the intention to proceed with redevelopment of available sites pending the relocation of the South		

Circular Road. The complexity of this project which may take a considerable time to resolve does not need to delay redevelopment of the shopping centre, which is not dependant on these wider improvements.

Respondent ID	Organisation	Nature of comment
NiFi9 LoW1U 1HL	St Modwen Developments Limited	Supporting

Comment

At draft policy 5.1.6 we acknowledge the need for a comprehensive master plan for the redevelopment of Catford Shopping Centre and Milford Tower Site. While that masterplan should be considered in the context of the other town centre development sites, delays in the promotion of these schemes should not hold back progress elsewhere. We welcome the creation of improved access through improved links to Rushey Green, Holbeach Road and Catford Broadway.

Respondent ID	Organisation	Nature of comment
NiFi9 LoW1U 1HL	St Modwen Developments Limited	Supporting

Comment

We support point e) that supports the inclusion of a redeveloped supermarket; however we do not believe that basement car parking should be prescribed at this stage. An appropriate level of car parking will be provided within the new scheme. The exact format in which car parking is provided will need to be determined taking into account a number of factors including the particular requirements of proposed retail, leisure and office occupiers. The cost of constructing the new parking facilities will be a significant factor, and we believe that prescribing underground parking at this stage could in the future render an otherwise viable scheme unfeasible.

Respondent ID	Organisation	Nature of comment
NiFi9 LoW1U 1HL	St Modwen Developments Limited	Supporting

Comment

We welcome the inclusion of Catford Shopping Centre and Milford Towers as Development site 1:

“a strengthened core retail area, anchored by a supermarket, creating an opportunity to provide improved shopping and leisure facilities; residential and office uses; new public space; improved pedestrian connections to Rushey Green and Catford Broadway; and improved environment to the surrounding residential areas”.

Whilst we agree that new street frontages to Holbeach Road could be introduced to enhance the existing residential environment, we are concerned that a similar policy could be applied to Thomas Lane. Any proposal to prescribe active frontages to Thomas Lane would impose a major development constraint. The feasibility of removing service vehicles from the existing first floor deck, and redeveloping the multi storey car park, would be severely hampered.

Respondent ID	Organisation	Nature of comment
NiFi9 LoW1U 1HL	St Modwen Developments Limited	Supporting

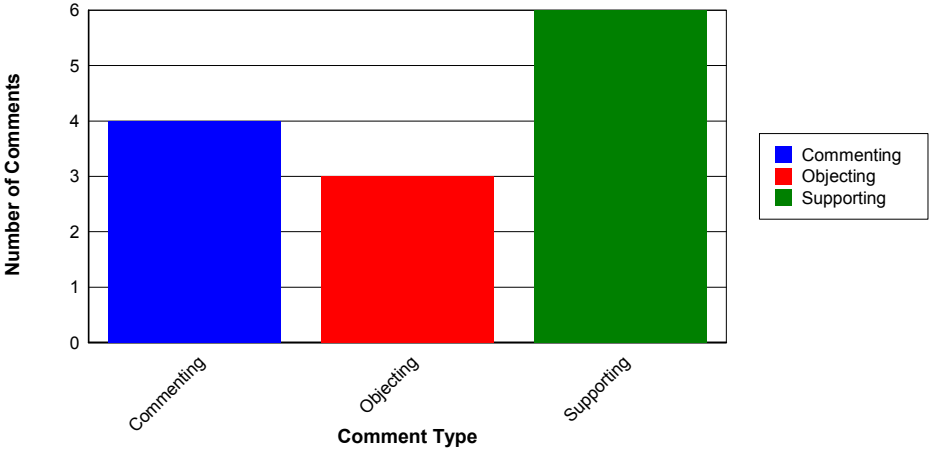
Comment

We welcome the reference to discussions undertaken to date with St Modwen and the need to focus on the expansion options for Tesco. The opportunities identified are supported, but the provision of additional uses whether office or commercial development need to be supported by market demand. On this basis we support the reference at Appendix A3.7 paragraph 2 that there is not necessarily a general market demand for new office accommodation unless a specific large occupier demand is identified.

It will be important to work with the existing retail/commercial tenants to ensure that their needs are met and that proposals seek to maintain a continuation of retail trade throughout the phases of redevelopment. This will ensure that Catford Town Centre maintains vitality and viability during this process.

It is important to retain Tesco as a significant anchor store for the centre and in doing so support their expansion needs.

Summary



Development Opportunity Site2 - Civic Quarter and South Circular

The Council will require a comprehensive master plan for the redevelopment of the Civic Quarter and South Circular (A 205) site. Site redevelopment should be considered in association with the Catford Shopping Centre and Milford Towers site.

The site is allocated for a mix of uses including civic (such as the library, onestop shop and other civic functions) (D1), office (B1a), retail (A1, A2, A3, A5), leisure uses (D1 , D2), residential (C3) and hotel accommodation (C1).

Development proposals will need to provide:

- a) Buildings of high design standards if the Town Hall and Civic Suite are redeveloped. The buildings should take account of the scale and character of surrounding buildings, especially the listed Broadway Theatre and buildings located on Catford Broadway;
- b) Improvements to Catford Broadway and the setting for the street market;
- c) A building or buildings making a clear and bold design statement on Rushey Green;
- d) Integration of the site to the immediate Catford Town Centre surrounds through improved access and permeability both to and within the site;
- e) Environmental improvements around the Broadway Theatre to improve its setting;
- f) Provision for loading and unloading access to the Broadway Theatre;
- g) Active uses at street level; h) Improved and consolidated location for the street market;
- i) New public open spaces designed using high quality materials, which include street trees, seating, public art and lighting;
- j) A sensitive transition between the Town Centre and the Culeverly Green Conservation Area;
- k) Improved and consolidated bus facilities;
- l) The realigned South Circular as a spacious and attractive boulevard designed to improve the overall pedestrian environment and connectivity within the town centre; and
- m) An assessment of the flood risk.

The policy requirements and design principles are illustrated on Figure 8. [See map]

Respondent ID	Organisation	Nature of comment
AnAh16LoSE6 4BD	Catford Timber Company	Commenting

Comment

The future of Catford Town Centre has always been related to the traffic problems inherent;the South Circular Road crosses the main London/Coast Road

In the past plans have been raised for a solution to this, the main problem faced,that is to separate people from traffic.

Local people are not unaware of the high number of pedestrian deaths within the Catford Gyratory scheme An underpass was ruled out because of a large number of springs in the area.

It would be interesting to see the exact route and traffic flow of the proposed re-alignment of Catford Road to the south of Laurence House,and what,if any, assistance would be given to relieve the volume of through traffic passing into the centre.

It would be better to prioritise a safe traffic scheme before increasing residential volumes, that is: to make the area safe.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Commenting

Comment

Comment: This policy is supported in principle. As above, this could usefully include the promotion of decentralised energy. In addition, the reference to the street market should include a statement of protection, to make the importance of its continuation explicit.

Respondent ID	Organisation	Nature of comment
NiFi9 LoW1U 1HL	St Modwen Developments Limited	Commenting

Comment

It is recognised that the proposed diversion of the A205 South Circular Road will bring benefits to the town centre, and that the redevelopment of the Town Hall and Lawrence House site will offer significant opportunities which could be successfully linked with the shopping centre scheme. It is, however, essential that these wider aspirations do not delay the long awaited redevelopment of the shopping centre which can proceed independently but in a manner complimentary to the development proposed for the neighbouring sites.

Respondent ID	Organisation	Nature of comment
NiJe48LoSE6 2LN		Commenting

Comment

The proposed South Circular 'Boulevard' could be an excellent solution to the challenging boundary situation. Priority should go to a good pedestrian crossing with islands at Bromley Road, and there should be a good crossing with lights at Canadian Avenue. A solution needs to be found for west and northbound cyclists needing to turn right off Catford road near the stations.

Respondent ID	Organisation	Nature of comment
J Pa5 CuCaLoSE6 2LE		Objecting

Comment

Although the building is not shown on the maps, I live in the retirement apartment block on Sangley Road which overlooks the A205- The noise and dirt from the traffic means that residents cannot open doors and windows unless they are subjected to this overpowering nuisance. On hot summer days last year and similar conditions in April this year, it meant that the heat was intolerable unless a window/door was opened and then the noise and pollution was insufferable.

Opposite this block exists an ample green area where the A205 could be realigned to the north, along the stretch from the junction of Plassy and Sangley Roads to the A21 (Figure 2 page 7). This would allow for a wider tree-lined 'boulevard style' pavement on the south side of Sangley Road where most people walk and enable the A205 to be directly in line with the proposed realignment south of Laurence House.

It is a fact the current A205 traffic is often caught on the hatched road area when trying to cross the A21 that causes congestion affecting both the Catford gyratory system and the A21 from Bromley. A direct crossing of these roads should eliminate this.

Respondent ID	Organisation	Nature of comment
J Pa5 CuCaLoSE6 2LE		Objecting

Comment

Lorry Park. X cannot find any provision in the Area Action Plan for an alternative site for the parking of lorries if the A205 is realigned.

When I spoke to drivers of the many lorries parked they were unaware of any threat to their parking site and were also surprised that they or their employers had not been consulted. They told me that the Catford lorry park is the only one now left for them to stay overnight after leaving the M25.

Many delivered to the wider SE London area and this site was a haven in order to comply with transport regulations. The loss of this site would be a bitter blow and it seems their needs have been ignored.

The lorry drivers do not at the moment pay for parking although they used to and would be prepared to pay again. When they can be accommodated this would be a source of income for the Council.

Respondent ID	Organisation	Nature of comment
NiJe48LoSE6 2LN		Objecting

Comment

The proposals to re-align the South Circular behind the Town Hall are excellent and necessary but not sufficient. The A21 northbound traffic needs to be taken out of the proposed civic square area in order to allow a full vibrant pedestrian square, traversed by busses and cycles, and defined by cafes and shops and the pub on the east side of Rushey Green.

This is the one point mentioned above on which the whole Plan is unclear. In the past such a re-routing was an option, and the considerations of that option have gone missing. The commercial, environmental and design effects of continued northbound traffic through the square are not considered. Northbound traffic could be rerouted around the Plassy Road site, alongside the present southbound lanes. I think it likely that land lost from the Plassy Road site would be more than compensated for by the increased value of the remaining land, and that would be due to the higher expectations of quality of space in the new Catford Square. That is what could enhance the value of the whole Plassy Road site and further the Council's overall objectives. Lessons should be learned from past decisions to allow such low quality development on the Plassy Road site. Those decisions lowered the commercial potential and value of Catford Centre overall.

The A21 has been rerouted around new civic spaces in Lewisham and notably in Bromley with great success. Transport for London and the Mayor of London should be convinced that the aims of re-routing of the A21 and of the south circular are primarily for reasons of creating the new square as well as enhancing the flow of busses, cycles, and pedestrians. This will not solve the problems of traffic capacity along the South Circular, but that should not be the immediate criteria for investment.

The Catford Town Centre Area Action Plan, Preferred Options Report proposes to “embrace the highest standards in architecture and urban design and raise the image and profiles of the area”

When I was a member of the Mayor’s Commission for a Spatial Development Strategy for a New London Plan, we recommended the creation of a hundred new squares to be made a priority. Inspired by Barcelona and other places, these were to be serving Londoners all across the city, and certainly places like Catford and Deptford were foremost in that vision.

I believe that residents of surrounding areas would rally behind the Council in really promoting a new square and a truly renewed Catford as a vibrant multi-cultural focus.

Respondent ID	Organisation	Nature of comment
NiFi9 LoW1U 1HL	St Modwen Developments Limited	Supporting

Comment

We welcome the proposal to relocate the South Circular to create a better pedestrian and town centre user environment, but this should not hold up other development schemes proceeding.

Respondent ID	Organisation	Nature of comment
RoFr22LoWC2H 0QL	The Theatres Trust	Supporting

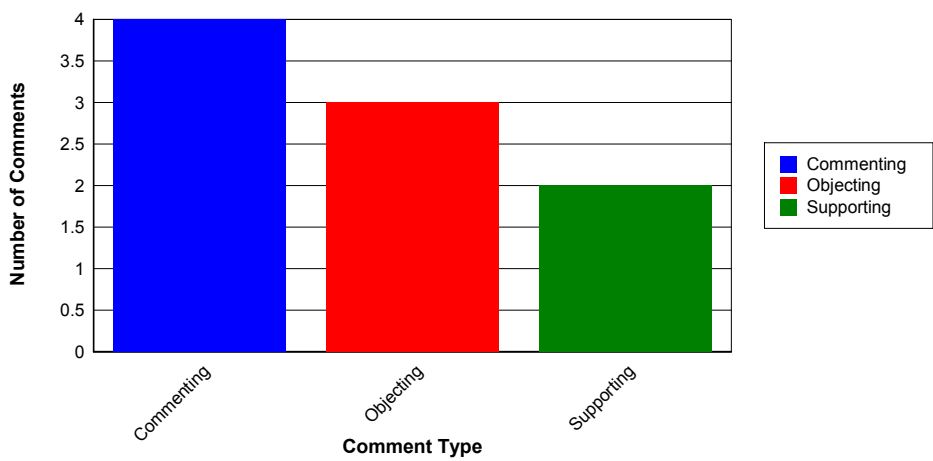
Comment

We welcome the proposed new setting for the Broadway Theatre which will provide solid support for an improved evening economy. Theatres are important anchors in the cultural and creative industries, providing jobs, skills, learning and educational opportunities, and vital secondary spend to tourism, retail and leisure sectors. They make a major contribution to the vitality of town centres and are significant elements of any district’s cultural infrastructure. Audiences coming to an event will enliven the surrounding area in the evening and provide regular custom for local bars and restaurants outside normal working and shopping hours.

Our only concern is that there are adequate parking facilities. The economics of evening entertainment venues are reliant upon audiences being able to get to the venue by public transport or car, being able to park their cars and bikes, and being able to get home safely. Controlled Parking Zones in central locations can have serious implications on the economic viability of such venues. We would strongly urge any planning policies concerned with parking provision to consider the presence of such evening leisure facilities in the locality. These attract families, young people, disabled patrons, and older people who can be discouraged to attend if the costs of travelling and parking make the price tag of the evening out too high. By arrangement, and if available, supermarket car parks are a useful source of additional evening parking in town centres.

We look forward to being consulted on future documents when they become available, especially Development Control Policies and Planning Obligations.

Summary



Development Opportunity Site3 - Plassy Road Island

The Council will require a comprehensive master plan for the redevelopment of the Plassy Road Island site. Consideration will need to be given to the site's relationship to the Shopping Centre and Milford Towers site and the Civic Quarter and South Circular (A 205) site.

The site is allocated for a mix of retail (A1 , A2 , A3, A4, A5), residential (C3), community (D1) and leisure (D2) uses, to compliment uses in the core shopping area.

Development proposals will need to provide:

- a) Integration of the site to the core shopping area of the town centre and immediate surrounds through improved access and permeability both to and within the site;
- b) Development which capitalises on the site's proximity to Catford Town Centre including taller buildings and denser development;
- c) Attractive new buildings with activity on the ground floor;
- d) A maximum retail unit size of 500 gross square metres;
- e) No net loss to the existing level of community and leisure uses;
- f) A high quality, easy to maintain public realm designed to encourage pedestrian activity;
- g) Improved definition of the boundaries of the site through landscaping and innovative building design that define and overlook pedestrian routes through and adjacent to the site;
- h) Safe and consolidated traffic access to the site; and
- i) Safeguard transport corridors for the realigned South Circular (A 205) in accordance with Transport for London's approved scheme.

The policy requirements and design principles are illustrated on Figure 9. [See map]

Respondent ID	Organisation	Nature of comment
KiWhBr9 LoEC4V 6AW	Hyde Housing Association	Objecting

Comment

Over the last 8 months Hyde and their design team have been in extensive discussions with senior officers at the Council on the proposed redevelopment of the site to provide a new high quality residential scheme of approximately 60 – 70 new residential units. In order to make best use of the site, it is proposed to provide a front block on to Plassy Road together with a row of mews houses to the rear which will assist in bridging the transition between the two storey houses to the east of the site and the higher density development within Catford town centre. Given the sustainable location of the site it is proposed that any development proposals that came forward on the site would be car free.

In view of the above, senior officers at the Council are fully aware of Hyde's intentions to redevelop the site and the general design principles and parameters agreed during the discussions held.

The issue of the potential opportunities to undertake localised road widening along the length of Plassy Road has been discussed at length with Transport for London and the emerging scheme for the site provides a 3 m strip of land along the site frontage to be retained for any potential future road widening. The retention of this strip of land has been discussed and agreed with officers in principle and will form an integral part of any scheme brought forward on site.

Respondent ID	Organisation	Nature of comment
KiWhBr9 LoEC4V 6AW	Hyde Housing Association	Objecting

Comment

We act on behalf of Hyde Housing Association who own 2 – 36 Plassy Road, Catford. We have reviewed the Catford Area Action Plan (AAP): Preferred Options Report and note that whilst Hyde's site falls within the area covered by the AAP it is not afforded any special designation or identified as a development opportunity site. Accordingly, our client wishes to object to the omission of the Plassy Road site from the emerging AAP. The basis of this objection is set out within the following paragraphs.

It is considered that the Plassy Road site, which is located within both the designated town centre and sustainable living area within the Adopted UDP, is a key 'gateway' site at the entrance to Catford. It currently comprises a series of terraces containing 18 Victorian houses which are not overly attractive nor create a sense of arrival or place when entering Catford town centre on the A205.

Respondent ID	Organisation	Nature of comment
KiWhBr9 LoEC4V 6AW	Hyde Housing Association	Objecting

Comment

In view of the foregoing, we consider that the Plassy Road site should be identified as a stand alone development opportunity site in the Catford Area Action Plan as it would deliver the regeneration of one side of Plassy Road which is a key gateway location to Catford town centre. It will also provide a range of new housing, including family accommodation, in a sustainable location and it will allow provision to be made for any future road widening to Plassy Road in accordance with the aspirations of Transport for London. Furthermore, it will assist in providing a transition

between the predominantly suburban development to the east and the higher density development to the west. It is also a wholly deliverable scheme which could be realised in the next 1 – 2 years.

An alternative option would be for Hyde's site to be identified within the wider Plassy Road Island site designation, although careful consideration would need to be given to the deliverability of this designation to ensure that Hyde's proposals are not held back.

Respondent ID	Organisation	Nature of comment
KiWhBr9 LoEC4V 6AW	Hyde Housing Association	Objecting

Comment

The emerging Catford AAP allocates the site immediately to the west of the Plassy Road site as 'Development Opportunity Site 3 – Plassy Road'. A mix of uses are proposed for this development opportunity site comprising retail, residential and leisure uses. Accordingly, the proposed residential uses on the Plassy Road site would be compatible with the prospective uses on the Island site and achieve the parallel aim of intensifying development in an accessible location. The inclusion of the site in the opportunity area or the stand alone allocation of the Plassy Road site would create opportunities to bring forward the redevelopment of this key gateway location in a holistic manner.

A key design objective identified within the AAP is the prospect of utilising the Island site as a new gateway feature when approaching the town from the east. We consider that the provision of a high quality building on Plassy Road opposite the Island site would enhance this area and achieve the stated aim of improving the arrival experience from this direction.

Furthermore, the emerging development proposals for Hyde's site also include extensive landscaping to soften the street scene and lessen the impact of any buildings. Such measures have been identified within the AAP as important considerations which will enable the potential road widening scheme and soften the development edges.

A further key design objective in developing out the Island site is considered to be the potential for the improvement of the relationship of the site to the residential area to the east and the town centre to the west. The proposal on Plassy Road, and its scale in particular (indicatively shown as the provision of four storeys along Plassy Road scaling down to two storeys adjacent to the dwellings to the rear) would serve to improve the interface between both land uses.

Respondent ID	Organisation	Nature of comment
MaCo30LoW1B 5NH	Church Commissioners	Objecting

Comment

The Church Commissioners are enthusiastic about redeveloping the site, and wish to work with Lewisham to regenerate this area of Catford Town Centre. The objective of intensifying uses and improving links with the town centre is strongly supported. Notwithstanding this, the draft policy and diagram included in the Action Plan needs refining.

The Church Commissioners object to the marginalisation of the development footprint through the safeguarding of two possible road options. The prospect of introducing temporary landscaping along Plassy Road until this is resolved is flawed as this would conflict with the creation of active frontages.

Given the complex nature of the site and the various land ownerships outside the retail park, the document should also make reference to phasing and how development is to be brought forward.

Finally the reference to community and leisure uses is ambiguous. The Church strongly advises that this element of the policy is deleted.

Respondent ID	Organisation	Nature of comment
MaCo30LoW1B 5NH	Church Commissioners	Objecting

Comment

On behalf of the Church Commissioners for England, King Sturge are instructed to object to draft Policy 5.3.7 and related Figure 9 of the above Area Action Plan.

In brief, it is felt that the safeguarding of two alternative road schemes is unreasonable, and blights future redevelopment opportunities through uncertainty. Furthermore, the plan does not show how development may be phased, given the variety of different land ownerships to the north of the retail park. It is also unclear as to what Community and Leisure Uses the Council are referring to in Paragraph 5.3.7(e) of the document.

Respondent ID	Organisation	Nature of comment
MaCo30LoW1B 5NH	Church Commissioners	Objecting

Comment

Ambiguity over the Community and Leisure uses Policy 5.3.7(e) seeks to protect

Criteria 'e' of Draft Policy 5.3.7 states that there should be "no net loss of community or leisure facilities".

The Church is unclear as to the community facilities the Council are referring to. These should be explicitly stated. For the avoidance of all possible doubt, the Church Commissioners do not consider the Mecca Bingo hall to be a community use but rather a commercial venture operated for profit.

Having dismissed the idea that the Bingo Hall is a community facility, it is also queried whether the unit has any intrinsic value as a leisure use. Although the Use Class Order considers Bingo Halls to fall under class D2 (Assembly and Leisure), the activities taking place on site are comparable to a betting office (A2) or Casino (Sui Generis). Therefore the Church Commissioners strongly dispute the need to afford the unit protection.

In terms of benefit to the community, housing and improved retail offer would help regenerate the island better than a re-provision of this D2 use.

It should also be noted that The Church Commissioners are not permitted to profit from gambling activities. It is untenable that a redevelopment of the retail park could take place if a policy were to remain that could potentially protect (or require a re-provision of) the Bingo Hall.

Solution: Remove Paragraph (e) or explicitly state the community uses that should be protected. This should not include Mecca Bingo.

Respondent ID	Organisation	Nature of comment
MaCo30LoW1B 5NH	Church Commissioners	Objecting

Comment

Land Assembly and Phasing

Understandably, the Council has looked at Plassy Road Island as a single development site. However, it is highly unlikely that the regeneration of the entire opportunity site can be achieved in a single tranche of development; especially as this will involve assembling a number of separate land ownerships.

As there is a danger that development could be gridlocked by differing commercial interests and timescales, consideration should be given to how the land can be phased.

Whilst the Church has been actively exploring opportunities to acquire other land ownerships, it would be unsound to assume that it is readily achievable. Furthermore, it would be unviable for the Church to acquire more land (and more risk) when there are numerous disparate ownerships to acquire and uncertainty over the road proposals remain.

Without allowing component parts to be developed separately, there is a risk that no scheme will be able to be delivered during the LDF period.

Solution: Identify a scheme of phasing and component parts within the masterplan approach.

Respondent ID	Organisation	Nature of comment
MaCo30LoW1B 5NH	Church Commissioners	Objecting

Comment

Uncertainty over the Road Scheme

There are currently two alternate road schemes being considered by Transport for London and Lewisham Council to widen the A 205 South Circular Road.

The widening of Sangley Road has been a longstanding option, safeguarded in various plans since 1982. Frustratingly, no scheme has been delivered to date. Nonetheless, the current safeguarded route set out in the adopted UDP does not impinge upon the eastern Plassy Road side of the retail park. However, the draft LDF now involves the introduction of a landscaped strip to "allow for the option of road widening". If implemented, this option would necessitate the loss of both McDonalds and Mecca Bingo, reducing the amount of land available for a redevelopment scheme without any further land being made available to the south.

Adding this further safeguarded option blights additional land from development. At the present time there is no approved road scheme to justify such an approach.

The practical problems of safeguarding two options are as follows:

- Potential tenants will be put off by the uncertainty over how close they might be located to a possible road scheme in the future {noise, construction works etc).
- It is unlikely to be commercially viable to deliver a development with a significantly reduced development footprint at the retail park.

King Sturge believes that it is unreasonable to safeguard land for two different options when a decision has yet to be taken on which road scheme will be pursued.

Furthermore, in safeguarding both options for the longer term, the plan proposes a significant landscaped strip along the perimeter of the site. This approach is flawed.

Active frontages need strong visual prominence. Given the site's position off the South Circular, one of the key elements in attracting tenants is the ability to market to passing bus passengers and motorists. The rationalisation of available land due to the protection of two road schemes means that it will not be viable to create sufficient set back for pedestrian circulation behind the landscaping.

The Church Commissioners also question how separate accesses to residential and retail uses can be created with a reduced site area.

Solution: Remove Plassy Road Landscape Strip which protects alternative road option.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment

Support: The importance given to the connectivity of this site is supported. As above, the need for a town centre approach to energy provision should be promoted.

Respondent ID	Organisation	Nature of comment
MaCo30LoW1B 5NH	Church Commissioners	Supporting

Comment

The Church Commissioners support the Council's view that the Plassy Road site is underutilised, and opportunities for intensification exist. Following Lewisham's informal advice the Church are considering a mix of uses on the site, including housing. Introducing a mix of uses on to the site will be challenging (for example, division of access and car possible parking), but is also supported by the Church Commissioners.

Integrating the site into the town centre is also an aim shared by both parties. This will increase activity in the area, and "open up" the site for other activities.

Respondent ID	Organisation	Nature of comment
MaCo30LoW1B 5NH	Church Commissioners	Supporting

Comment

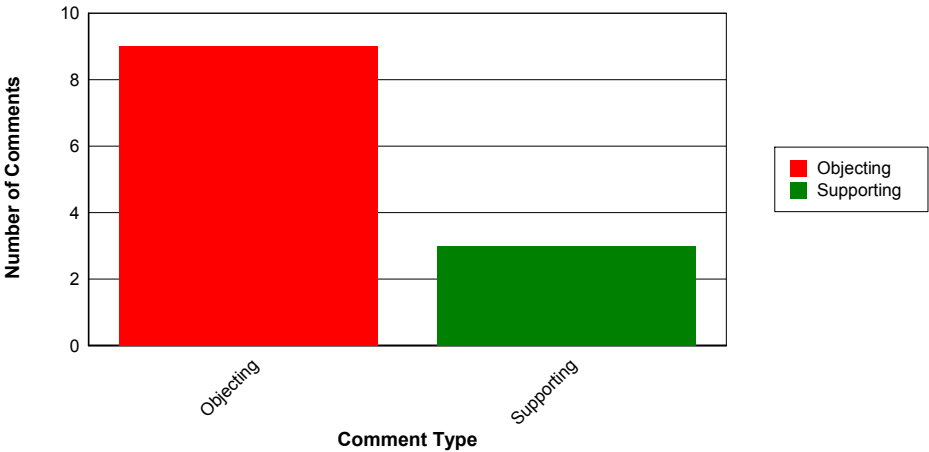
The site is identified as "Plassy Road Island, Development Opportunity Site 3" in the Preferred Options Area Action Plan for Catford. The Church Commissioners welcome a site specific designation for the site, and the recognition that the retail park is an under-utilised opportunity site, where a greater intensification of uses is appropriate.

Nevertheless, the draft policy and related diagram have raised a number of concerns which need further consideration if the Church Commissioners are to support the document.

The main areas of contention are as follows:

- Uncertainty over road scheme and unrealistic safeguarding of two options.
- No reference to land assembly constraints.
- Ambiguity over the Community and Leisure uses that Policy 5.3.7(e) seeks to protect.

Summary



Development Opportunity Site4 - Former Greyhound Stadium and Catford Railway Station

The Council will require a comprehensive master plan for the redevelopment of the Greyhound Stadium area and the railway stations. This will involve a housing led mixed use development with a focus for key workers and a mixture of small scale integrated community, retail, open space and recreation uses. Improvements to the railway stations and the surrounding environs will also need to be pursued.

The site is allocated for a mix of residential (C3), community (D1), small scale convenience retail (A1 , A3), business (B1) and open space and recreation.

Development proposals will need to provide:

- a) A layout that provides for open space, and is not dictated by the sewer line;
- b) Integration of the site with the Catford Town Centre, residential development to the east and west, and Ladywell Fields, through an analysis of the movement of people to ensure logical improved access through and to the site (pedestrian and cycle access);
- c) Improved definition of the boundaries of the site through landscaping and innovative building design that define and overlook access routes through and adjacent to the site, particularly along the South Circular (A 205) and the boundaries with Ladywell Fields;
- d) Building design that is sympathetic to the scale and character of adjacent residential development;
- e) Environmental enhancement of the River Ravensbourne and the associated Waterlink Way;
- f) An assessment of the flood risk;
- g) An assessment of the existing trees and vegetation, and what is to be retained, to inform the landscape plan for the site; and
- h) Enhanced railway station facilities for Catford Station and Catford Bridge Station, which includes improved accessibility between the two stations and new public space that is connected, active and accessible.

The policy requirements and design principles are illustrated on figures 11 and 12. [See map]

The use of planning obligations and conditions on planning permissions may be used in pursuit of this policy.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Commenting

Comment

Comment: It is important to note that there is potentially an issue with construction access via the A205/Ravensbourne Park for this development. TfL is currently in discussions with the developers to resolve the concerns. Figure 11 shows as item "K" that there is potential for a second station access. Whilst this is supported by TfL in principle, this may be difficult to achieve given the levels changes and station security issues, and this aspiration would be wholly dependent on the development to fund it.

Respondent ID	Organisation	Nature of comment
NiJe48LoSE6 2LN		Commenting

Comment

The Greyhound Stadium site has the potential to house key workers, especially younger workers in smaller units and with minimal dependence on car ownership. It also has significant further environmental potential. Again, on the Mayor's Commission for a Spatial Development Strategy for London, we urged the Mayor to consider the BEDZED development, the pioneering high-density estate aiming for zero carbon emissions in Beddington, Sutton. The Mayor adopted a policy to have a ZED in each of the 32 boroughs, and I submit to you again that this site could host the 'CATZED'. Lewisham could in doing so return to its pioneering work with Architype in environmentally and socially sustainable architecture.

Your proposals for the area between the stations are very promising and I hope that a cycle route will be designed into that area.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Objecting

Comment

Object: The reference to a 'focus on key worker housing' is not appropriate in policy. It is acknowledged that English Partnerships are bringing this site forward as part of their London Wide Initiative programme, however any negotiations on tenure split need to be agreed on a site-by-site basis. It is more appropriate to state that the site will 'involve residential units, maximising levels of affordable housing'.

Respondent ID	Organisation	Nature of comment
KeCl102 HaLoE14 9GS	English Partnerships, Countryside Properties & HH/	Objecting

Comment

Figure 11

We believe our forthcoming planning application responds positively to all the challenges set down within this plan. However, the proposed cycle link (Point C) will be incorporated within the new footbridge to be constructed in position

T on the diagram. The new footbridge at the centre of the site will provide a direct linkage into the town centre and will adequately serve the needs of the surrounding residents where there is currently no crossing. A second access at Point C would add little to the permeability of the area and we consider is both unnecessary and unviable, bearing mind the likely cost of construction. We therefore object to the requirement for a crossing at Point C.

Respondent ID	Organisation	Nature of comment
KeCI102 HaLoE14 9GS	English Partnerships, Countryside Properties & HH/	Objecting

Comment

5.4.3, 5.4.5 and 5.4.7 Draft policy

All 3 paragraphs make reference to the constraints of the site recognising the main sewer line running its entire length as well as the railway lines, the park and the road acting as constraint barriers. Of particular concern are the statements in Paragraph 5.4.5 which states that "the sewer line should not dictate the site layout" and paragraph 5.4.7 a) which states " A layout that provides for open space and is not dictated by the sewer line". The CAAP does not acknowledge that with each constraint, an easement exists where no building works are permitted. The sewer pipe requires a five metre easement either side of it whilst the Environment Agency have set an eight metre easement either side of the River Ravensbourne. In addition, Network Rail have insisted a two metre easement must exist adjacent to the boundary of the retained railway lines.

These constraints can not be moved or ignored through the redevelopment process and it demonstrates a lack of understanding of the magnitude of the issues they present to suggest that they should not dictate site layout. They do dictate where development can and can not be located so inevitably, they have a large bearing on the design of the development proposed. However, our client team has spent nearly two years working on a masterplan for the site in full co-operation with Lewisham's Planning Officers to deliver a proposal that tackles both the constraints and opportunities of the site in a comprehensive, high quality and sustainable manner. Therefore, we object to the current wording of the draft CAAP on this matter and ask that it be amended to realistically represent the challenges presented by the immovable constraints on site.

Respondent ID	Organisation	Nature of comment
KeCI102 HaLoE14 9GS	English Partnerships, Countryside Properties & HH/	Objecting

Comment

Figure 12

We wish to object to the use of this image in this document. Any reader may expect this to be what is going to be delivered on the site yet we have never been consulted on its use and it does not reflect any discussion we have had with regard to the site. It is impractical to provide crossings D and E and equally, the image shows that the River Ravensbourne sits level with the road when it is in fact set much lower down. We would be happy to provide you with alternative more accurate images that have been prepared as part of our impending application, but in the meantime, object to the use of the images shown.

Respondent ID	Organisation	Nature of comment
KeCI102 HaLoE14 9GS	English Partnerships, Countryside Properties & HH/	Objecting

Comment

Figure 11

With regards to a second station entrance for Catford station (Point K), this option has been rejected by Network Rail on operational grounds. On this basis, there is no realistic prospect of it materialising and we consider this option should be removed from the draft CMP. In terms of Points Q and R, the draft CAAP implies that the improvements to the junction with Catford Road will be undertaken by us as part of our development. This is not the case as the works required are the responsibility of TfL. We therefore object to the current notation ask that it be amended accordingly.

Respondent ID	Organisation	Nature of comment
KeCI102 HaLoE14 9GS	English Partnerships, Countryside Properties & HH/	Objecting

Comment

A key aspiration of the CAAP is to deliver a high quality public space between the Catford and Catford Bridge railway stations, provide for a new Catford station ticket hall building, improve linkages to Catford Town Centre and to improve and naturalise the River Ravensbourne. This investment is required because the Council's considers this site crucial in delivering improved environmental quality and permeability to Catford Town Centre that will positively enhance the character of the area as a whole. EP shares this view and is prepared to contribute, as far as is reasonably possible, towards the significant costs involved in these works, as part of its developer contributions should planning permission be granted.

However, we believe the improvements in the area will be of benefit to Catford as a whole, including the other DOS. Despite this, we note that the other DOS are not obliged to contribute to the Gateway improvements, the implications being that the entire cost of the improvements should fall on our site. We do not consider this to be reasonable as it will place an overbearing cost onto EP as the first developer/investor to kick-start the regeneration of Catford Town Centre and we must therefore object. We believe that there should be a mechanism for the other DOS to contribute to the Station Gateway improvements in recognition of the fact that they will impact upon this area and benefit from any enhancement of it and the positive knock on effect this will have on Catford as a whole.

Respondent ID	Organisation	Nature of comment
KeCI102 HaLoE14 9GS	English Partnerships, Countryside Properties & HH/	Objecting
Comment		
<p>With our development partners Hyde Housing Association and Countryside Properties, we are in the final stages of preparing a planning application for the comprehensive redevelopment of our land holding at the former Catford Greyhound Stadium and Station Gateway to provide for a high quality residentially-led mixed use scheme. We have reviewed the draft Catford Town Centre Area Action Plan (CAAP) and support the inclusion of our site within it. However, there are aspects of the document that we consider require amendment and we have therefore set out below our objections following the paragraph and text references found in the CAAP.</p> <p>The first point to note is that there appears to be a typing error in the document. On page 36 (Introduction to the Development Opportunity Sites (DOS)), our site is identified as Development Opportunity Site 3; however, further into the document, Site 3 refers to Plassey Road and our site is Development Site 4. We ask that this be clarified in any subsequent drafts of the CAAP.</p>		

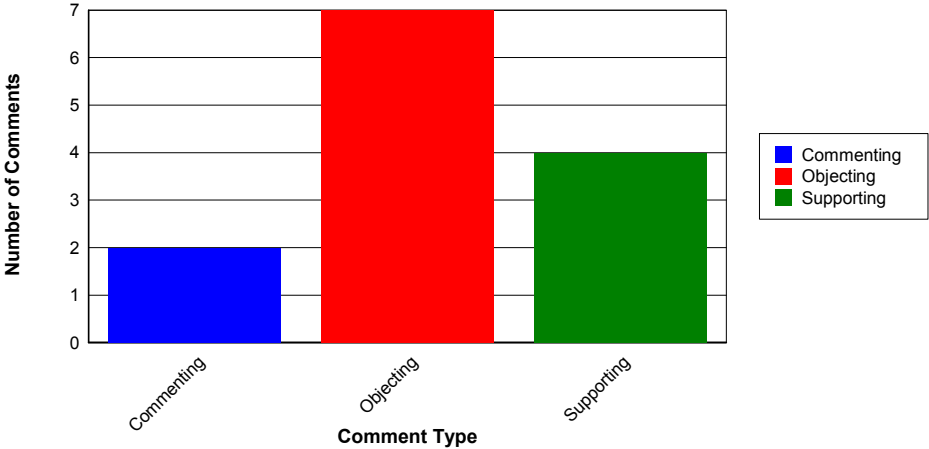
Respondent ID	Organisation	Nature of comment
ChPr1 LoNW1 2DN	Network Rail	Supporting
Comment		
<p>Network Rail strongly supports the enhancement of station facilities in relation to Development Site 4 and looks forward to continuing to work with the Council and the developer to achieve this goal.</p>		

Respondent ID	Organisation	Nature of comment
FrRo30HiOrKeBR6 0NN	St Dunstons College Educational Foundation	Supporting
Comment		
<p>The School also wishes to generally support the proposals relating to Development Opportunity Sites no.4 (the Greyhound Stadium area) and no.5 (the Wickes site). In respect of the former, the School supports the preferred option of making the redevelopment of the Stadium area based primarily on residential provision. The content of paragraphs 5.4.5, 5.4.7 and the associated draft policy proposed are therefore supported.</p>		

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting
Comment		
<p>Support: The promotion of the redevelopment around the restoration of the river corridor, and the reference to the importance of Ladywell Fields SINC is supported. In addition, the design principles are supported, particularly the need for development to not be dictated by the sewer, the importance of connectivity, and for open space within the development.</p>		

Respondent ID	Organisation	Nature of comment
KeCI102 HaLoE14 9GS	English Partnerships, Countryside Properties & HH/	Supporting
Comment		
<p>We generally welcome the Council's continued support for redevelopment of this site and its consideration that development will act as a catalyst for improving the image of Catford Town Centre. We are also pleased that the Council through its CAAP continues to see that a residentially-led mixed use scheme incorporating small scale community and retail/commercial is the most appropriate development/use for the site. However, notwithstanding this we do have the following comments to make.</p>		

Summary



Development Opportunity Site5 - Wickes

The Council will require a comprehensive master plan for the redevelopment of the Wickes site. The site is allocated for a mix of residential (C3), comparison retail (A1), employment (B1), community facilities (D1) and open space uses. Small scale convenience retail may be acceptable if serving immediate local needs.

Non-residential uses should be concentrated in the northern half of the site to be more accessible to the South Circular (A205).

Development proposals will need to provide:

- a) Integration of the site to the Catford Town Centre and immediate surrounds through improved access and permeability both to and within the site, including enhanced pedestrian and cycle links across and under the South Circular (A205) and Catford railway line;
- b) Improved definition of the boundaries of the site through landscaping and innovative building design that define and overlook pedestrian routes through and adjacent to the site, including the South Circular;
- c) Attractive new buildings with activity on the ground floor and buildings that overlook the sport fields and form an attractive backdrop to Catford Town Centre to the east;
- d) Innovative solutions to the ground level differences between the site and the South Circular;
- e) Improved accessibility and links across the South Circular to Catford Station;
- f) Consolidated access to the site by making the junction with the South Circular and Ravensbourne Park easier to cross by combining the two vehicle access routes into the site and introducing pedestrian crossing facilities;
- g) Environmental enhancement of the River Ravensbourne and the associated Waterway Link; and
- h) An assessment of the flood risk.

The policy requirements and design principles are illustrated on Figures 3 and 4. [See map]

Respondent ID	Organisation	Nature of comment
MaTo70ChKeBR7 5AQ	Wickes	Commenting

Comment

My client, Wickes, have simply not had the time to review the AAP in order to pass comment on the document's aspirations. Please could you keep my details on your records and provide me with any updates, or later iterations of the AAP as they emerge.

Thank you

Respondent ID	Organisation	Nature of comment
NiFi9 LoW1U 1HL	St Modwen Developments Limited	Objecting

Comment

The introduction of small convenience retail uses in the development areas around the station should be suitably limited in size to ensure that the centre doesn't become further elongated to the detriment of its core. The redevelopment of the Wickes site should likewise not expand the range of retail types traded and remain a bulky goods destination to augment the town centre.

Respondent ID	Organisation	Nature of comment
FrRo30HiOrKeBR6 0NN	St Dunstons College Educational Foundation	Supporting

Comment

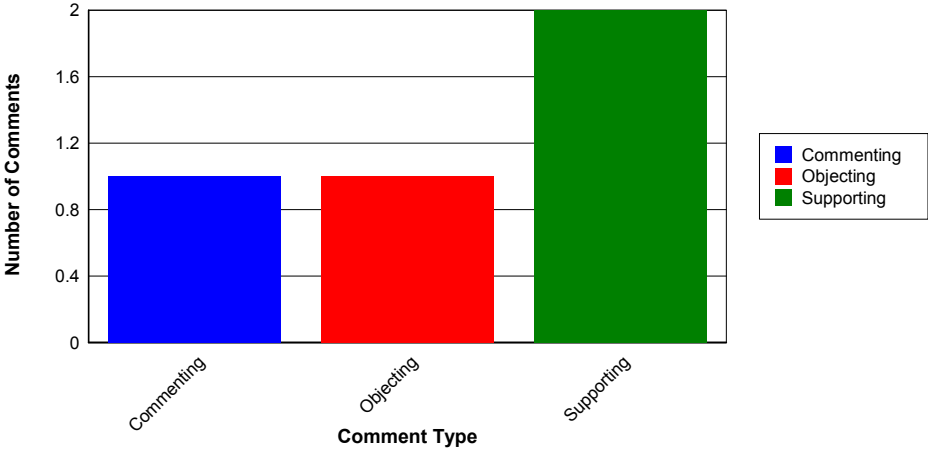
The School also wishes to generally support the proposals relating to Development Opportunity Sites no.4 (the Greyhound Stadium area) and no.5 (the Wickes site). In respect of the former, the School supports the preferred option of making the redevelopment of the Stadium area based primarily on residential provision. The content of paragraphs 5.4.5, 5.4.7 and the associated draft policy proposed are therefore supported. In relation to the Wickes site, the School supports the preferred options listed in paragraph 5.5.5 and the draft policy set out in 5.5.7. The School is in considerable need of additional space to expand its built facilities and in particular to find a site for a new junior school in close proximity to the main site. The Council should, therefore, consider adding to the draft policy an allocation for part of the site to be used for educational purposes. Otherwise the School would support the use of the site for mixed use development particularly including a sizeable residential element,

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment

Support: The promotion of the redevelopment around the restoration of the river corridor is supported.

Summary



Comments relating to Sections

Section 0

Respondent ID	Organisation	Nature of comment
AlBy1 13LoEC1N 2ST	English Heritage	Commenting

Comment

Thank you for your letters dated 17 August 2007 consulting English Heritage on the above document.

Owing to the volume of work that is being generated by the introduction of the new planning arrangements and Strategic Environmental Assessment, we are finding it necessary to prioritise which consultations we are able to respond to.

In broad terms, we are endeavouring to respond to consultations where we consider that there are likely to be significant implications for the historic environment. In our assessment the Lewisham has local historic environments of significance by virtue of the conservation areas and archaeological areas throughout the borough. The council's in-house conservation and archaeological advisers should be involved in discussion on the impacts of the plan's policies on these areas.

Although we have not been able to provide a response at this stage, I must stress that this does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the document which is the subject of the consultation, and which may, despite the sustainability appraisal, have adverse effects on the historic environment.

Respondent ID	Organisation	Nature of comment
AlFa9t15LoSW1P 4RR	Government Office For London	Commenting

Comment

You have produced a Sustainability Appraisal and Strategic Environmental Assessment report for your Core Strategy. I understand that you are liaising with the Environment Agency regarding undertaking a Strategic Flood Risk Assessment. Will this be completed in time to feed into your evidence base before you proceed to submission? Under the tests of Soundness this relates to test (iii).

Respondent ID	Organisation	Nature of comment
ChAmEa30LoSE1 7TL	Environment Agency	Commenting

Comment

The Environment Agency is pleased to see that most of the key environmental issues have been addressed. A key message emerging from PPS1 is that development can (indeed should) be seen as a tool of environmental enhancement rather than as a source of environmental degradation, as in the past. Paragraph 19 suggests that adverse environmental impacts should be avoided if possible, mitigated against, if unavoidable, and/or compensated for (possibly elsewhere) if mitigation measures are only partially successful.

The Environment Agency considers new development in urban areas an opportunity to create enhancements and opportunities for biodiversity. The AAP provides an ideal opportunity for enhancement of low value conservation sites and create and enhance ecological networks and ecologically resilient and varied landscapes, to support a range of species

Improving and linking green spaces to local residents and wider population and visitors is very crucial and we welcome proposals for the improvement and enhancement of the public realm. In particular we see development as an opportunity for the green spaces to become a major educational and community resource. Providing new and attractive green grid style development, improving entrance ways and knowledge of parks, enhancing and possible extension of the existing green spaces, would be welcome development.

We would recommend increased environmental recreation in and around river corridors e.g. increased access to fishing and environmental education. A more informal / softer landscape that connects to the water edge would add a quality of life value for visitor enjoyment and could be an environmental and economic benefit to new development in the area.

Ecological value of the green spaces would be improved by removing hard concrete edges along river corridors and replacing with natural planting and "soft" banks. The Environment Agency would be keen to be involved in enhancements to the green spaces. We can provide examples of enhanced previously "concrete edge" urban lakes and park areas to use as good practice.

The council should require development proposals to include landscaping and other ecological features that contribute towards protecting, managing and enhancing local biodiversity. Information on these measures must be submitted with an application

Applicants proposing major Developments should appoint a suitably qualified ecologist to prepare appraisal of the proposals and, if appropriate a biodiversity action plan for the site.

Respondent ID	Organisation	Nature of comment
DaHaLo20StLoSW1E 5RS	Natural England	Commenting

Comment

RELATES TO SUSTAINABILITY APPRAISAL

Sustainability Objectives, Baseline and Context

Figure 4 - Sustainability Objectives (page 18) is similar to Figure 1 in the Non Technical Summary mentioned above, in that appears to be predominately economic. The document has otherwise identified and referenced appropriate policies, plans and programmes and the areas covered are those that Natural England would wish to see considered.

Respondent ID	Organisation	Nature of comment
AlFa9t15LoSW1P 4RR	Government Office For London	Objecting

Comment

You have taken the approach within this Preferred Options document of only putting forward one preferred option in draft policy format within each policy area. With this approach you will need to show through the evidence base that there is only one realistic option for each policy remaining at this stage; details of those options being rejected and the reasoning for this; and that you have not closed off other possible options which would have benefited from further consultation. In paragraph 1.2 of the Planning Inspectorate's Local Development Frameworks: Lessons Learnt Examining Development Plan Documents it says that "LPAs should be clear that they are not presenting a "draft plan" at preferred options stage".

Respondent ID	Organisation	Nature of comment
DaHaLo20StLoSW1E 5RS	Natural England	Supporting

Comment

RELATES TO SUSTAINABILITY APPRAISAL

The Non - Technical Summary provides a list of the eighteen objectives for the Plan, as listed on page 2 and Natural England is broadly supportive of these objectives as listed, especially the following:

To maintain and enhance open space, biodiversity, flora and fauna.

However, given the aegis of PPS 9 Biodiversity and key principle fii) the Council should have regard to increasing biodiversity as well as

maintaining and enhancing it, for example:

"Plan policies and planning decisions should aim to maintain, and enhance, restore and add to biodiversity and geological conservation interests. In taking decisions, local planning authorities should ensure that appropriate weight is attached to designated sites of international, national and local importance; protected species; and to biodiversity and geological interests within the wider environment".

The Council should give consideration to amending this objective to include increasing Biodiversity.

Objective 7

To reduce car travel and improve accessibility by sustainable modes of transport.

Objective 8

To mitigate, and adapt to, the impact of climate change.

Figure 2 provides a list of Key Issues identified including Nature Conservation, Biodiversity, Open Space and Recreation all of which are welcomed for their inclusion, as are the bullet points identified with them:

- Protect and enhance biodiversity in Catford Town Centre
- Consider the Ravensbourne River for its Biodiversity assets
- Consider for new/improved wildlife habitats
- Adequacy and quality of Open Space provided (distribution) in and around Catford Town Centre, including Waterway link
- Protection of Open Space and Biodiversity from development and enhancement where possible.

The Appraisal Methodology proposed is acceptable and in line with those undertaken by other Borough's.
Background

Paragraph 3.2 (Page 13) provides a list of Objectives for the Catford Area Action Plan, including Objective 6 which relates to improved accessibility through improved pedestrian, cycle and public transport links and interchanges which is supported.

Objective 7 which relates to improved sustainable access to local open spaces which is also supported.

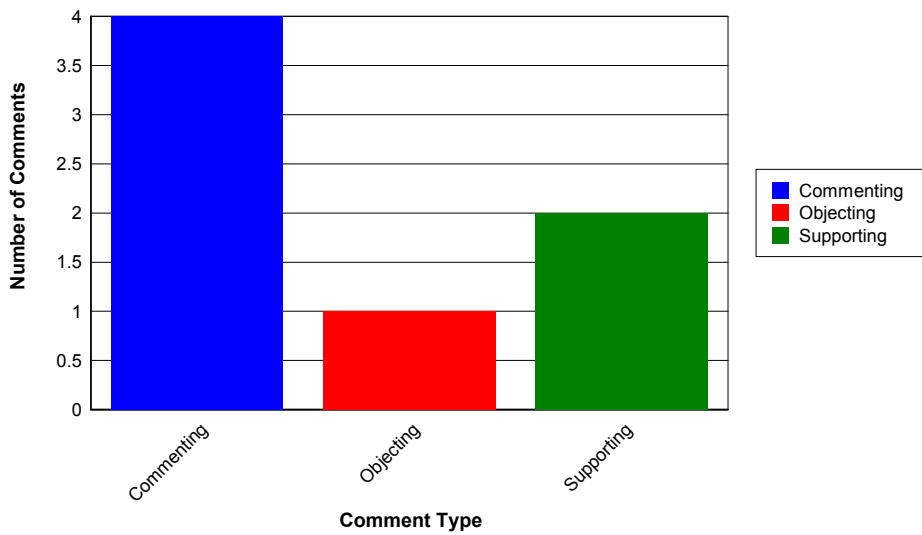
However, there appears to be no objectives relating to Biodiversity or the environment, these objectives as listed under Figure 1 - Objective 5 appear to predominately relate to economic issues, with some social and leisure objectives,

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment

Both Area Action Plans (AAPs) are supported in principle. Lewisham Town Centre AAP is a particularly successful response to the new planning systems promotion of spatial planning. The two documents are however very different in style and content, which may create an awkward family of documents when finished. The Catford Town Centre AAP is largely policy based, with detailed policies on housing and sustainability, for example, which in some respects mirrors the Development Policies and Core Strategy policies. However, Lewisham AAP takes a design led approach, and does not include the same policy detail. Both documents are largely successful, but it may be beneficial to introduce some standardisation across the pair.

Summary of Comments



Section 1.3

Respondent ID
AIFa9t15LoSW1P 4RR

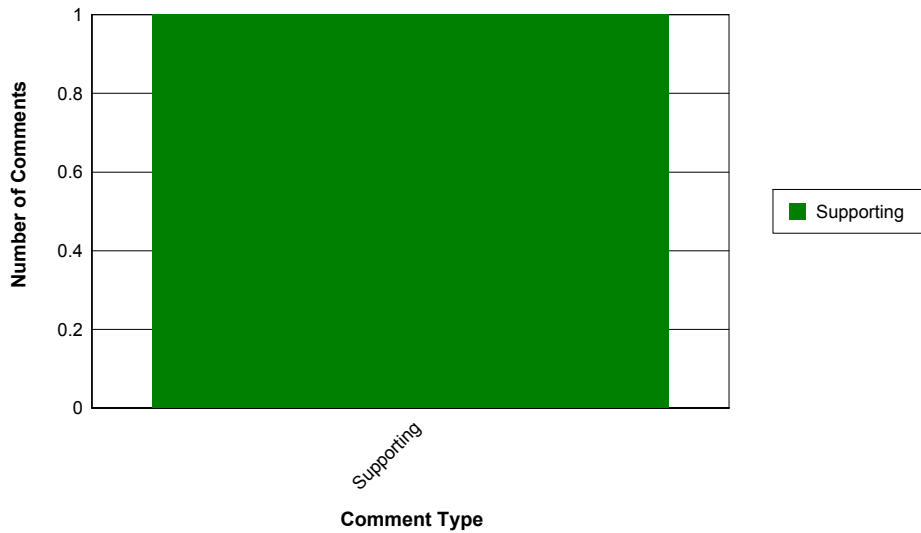
Organisation
Government Office For London

Nature of comment
Supporting

Comment

The first section of this document sets out the context for Catford town centre in relation to the rest of the borough and South East London and the City of London (Figure 1), which is welcomed. This section also sets out the background to the Area Action Plan. However, I could not see any reference here, or in the rest of the document, to your Council's draft Core Strategy and the relationship between the two documents.

Summary of Comments



Section 2.2

Respondent ID
NiFi9 LoW1U 1HL

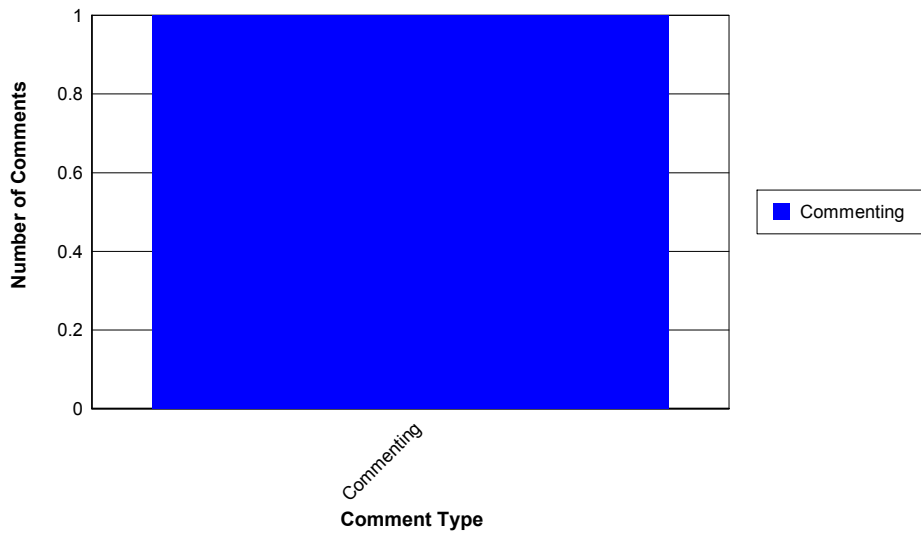
Organisation
St Modwen Developments Limited

Nature of comment
Commenting

Comment

St Modwen are keen to see a redevelopment of this site brought forward, and will be prepared to work in close cooperation or in partnership with London Borough of Lewisham in their capacity as another major stakeholder in the scheme. St Modwen share the Council's vision for a new town centre which provides an enhanced public domain, improved scheme 'edges', better permeability, and user friendly car parking in addition to a significantly enhanced mix of retail, leisure and other uses. However, it is critical that the AAP is not over-prescriptive in its design criteria, particularly in relationship to the format in which new car parking facilities are provided. It is essential that the AAP does not impede development either by restricting the developer from responding to occupier demand or by increasing development costs to a level that investment can not be justified.

Summary of Comments



Section 3.0

Respondent ID
GiDoCiThLoSE1 2AA

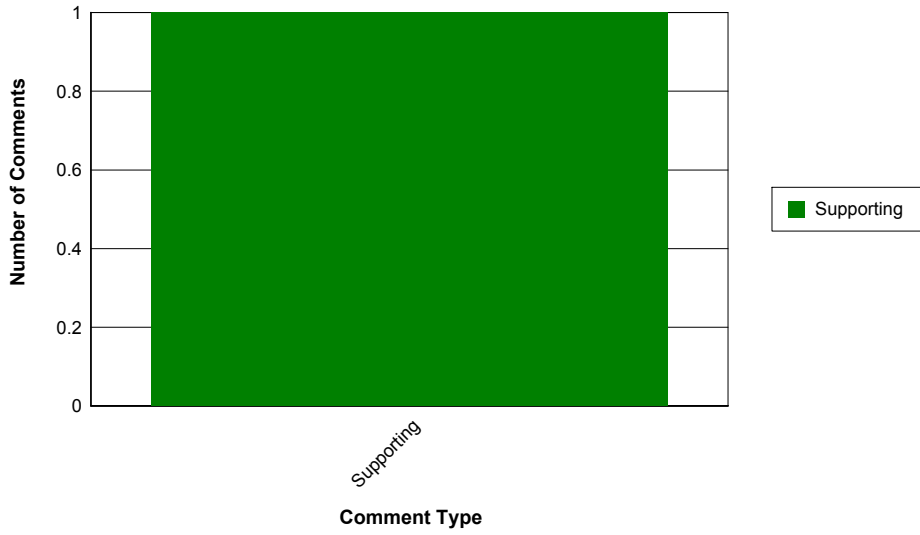
Organisation
Greater London Authority

Nature of comment
Supporting

Comment

Support: The four main elements listed as driving the spatial development strategy for Catford are supported.

Summary of Comments



Section 3.1

Respondent ID

AIFa9t15LoSW1P 4RR

Organisation

Government Office For London

Nature of comment

Objecting

Comment

5. Throughout this document you make no reference to the evidence base in your Sustainability Appraisal. This is particularly noticeable in the justification of each preferred option and in the dismissal of others. There is also little reference to the responses received following the issues and Options consultation stage - this is covered when you consider the town centre boundary only. You do list the options considered during the Issues and Options consultation stage of this document, which helps puts things into context. This is then followed by your choice of preferred options. However, as these are not always on the same page and are referred to by number only, it can be quite confusing and difficult to read across. An example of this can be seen before policies CAAP1 (Core shopping areas) - CAAP9 (Mini cab or taxi offices).

Respondent ID

AIFa9t15LoSW1P 4RR

Organisation

Government Office For London

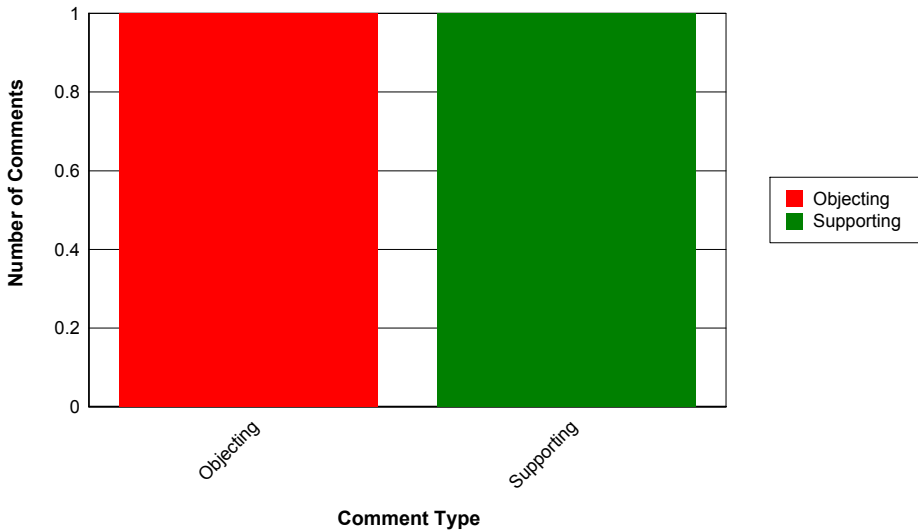
Nature of comment

Supporting

Comment

We welcome the section detailing the spatial development strategy for Catford's town centre. This is broken down into land use and activities, creating new public spaces, transport improvements and the regeneration of key development sites. It would have been helpful to the reader if you had shown how all of these issues link together in forming the overall strategy for the area. However, you do include a useful map (Figure 3) which does show the five key regeneration areas the document focuses on and how these relate to each other.

Summary of Comments



Section 3.5

Respondent ID	Organisation	Nature of comment
DuMa10LoW1J 8JR	Tesco Stores Ltd	Commenting

Comment

In recent years Catford Town Centre has faced increased competition from rival retail destinations throughout London. If Catford is to continue to fulfil its role in the retail hierarchy and successfully serve its catchment it is important that the Council help facilitate enhancements to the centre's retail offer.

Tesco have long had aspirations to improve their offer within Catford and have previously met with the Council to discuss different opportunities for achieving this. More recently Tesco have been co-ordinating with St Modwens, the owners of the centre, to review the potential to enhance their existing store as part of wider improvements to the Catford Centre.

In this context we welcome the Council's aim to stimulate development interest in order to improve and regenerate Catford Town Centre. We also welcome the Council's recognition of the importance of the Catford Centre and the importance of its redevelopment to the perception of Catford. Central to this will be the retail offer introduced through future redevelopment of the centre. An enhanced Tesco store will act as a key anchor for Catford, increasing footfall through the centre, vital to the future viability of the vision set out in the Area Action Plan. It is important that the Council do not prejudice the future of the centre by setting parameters for its redevelopment ahead of detailed design work and viability testing.

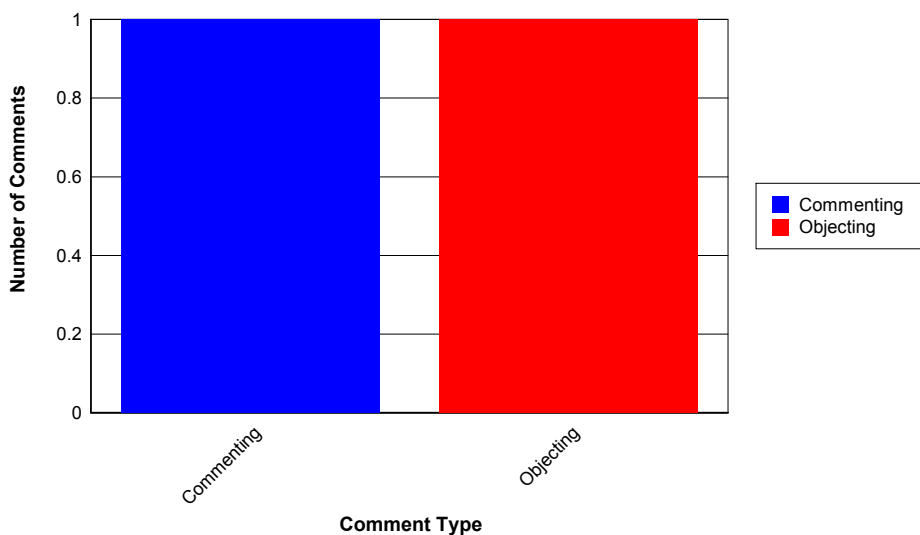
We acknowledge the importance of relocating the South Circular to the wider environmental enhancements proposed for the town centre. However, given the complexities of this project it is important that it is not fundamental to the Area Action Plan so as to avoid any unnecessary delays to other projects proposed.

Respondent ID	Organisation	Nature of comment
NiFi9 LoW1U 1HL	St Modwen Developments Limited	Objecting

Comment

At paragraph 3.5 we note the proposed redevelopment of Plassey Road site seeks improved shopping facilities. This redevelopment should not be brought forward prior to the Catford Shopping Centre proposals as this would dilute tenant demand and thereby affect the viability of the core shopping area redevelopment.

Summary of Comments



Section 4.0

Respondent ID
AIFa9t15LoSW1P 4RR

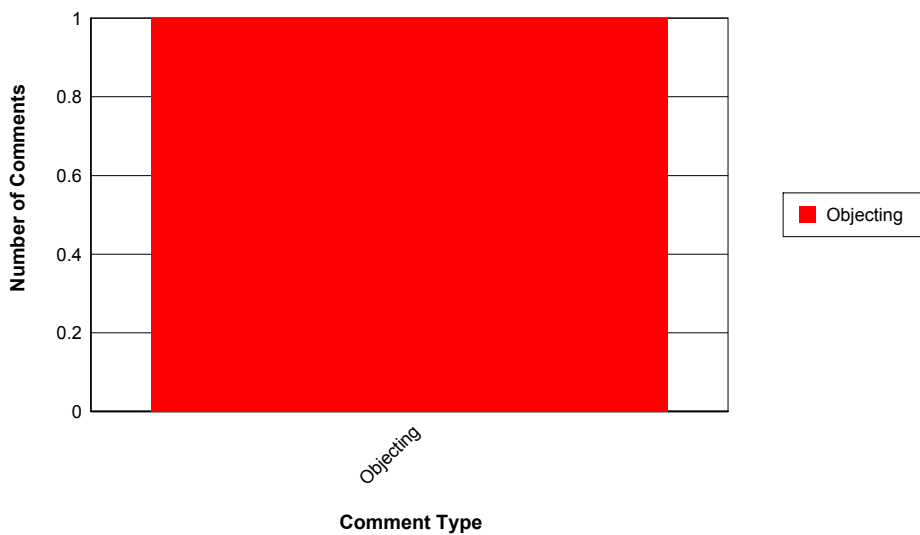
Organisation
Government Office For London

Nature of comment
Objecting

Comment

Section 4 deals with key development issues. Within this section are a range of thematic issues and policies to address them. It would be interesting to know why you did not continue the more spatial approach set out in the four themes in section 3. These policies appear to be more like general development control policies rather than relating directly to Catford town centre, indeed some of which seem to repeat policies contained within your draft Development Control DPD, for example CAAP25 (Energy efficiency and renewables for major developments) and CAAP26 (Stand alone and roof mounted renewable energy). Furthermore, they are not generic in their nature but cover rather specific issues. Examples of which include CAAP5 (Evening economy uses), CAAP6 (Hot food takeaways), CAAP8 (Public houses), and CAAP9 (Mini cab or taxi offices). Some policies are also rather long, which can be construed as them being compounded in order to reduce the overall number of policies, for example CAAP12 (Urban design principles). Under the tests of Soundness this relates to test (vii).

Summary of Comments



Section 4.1

Respondent ID
NiFi9 LoW1U 1HL

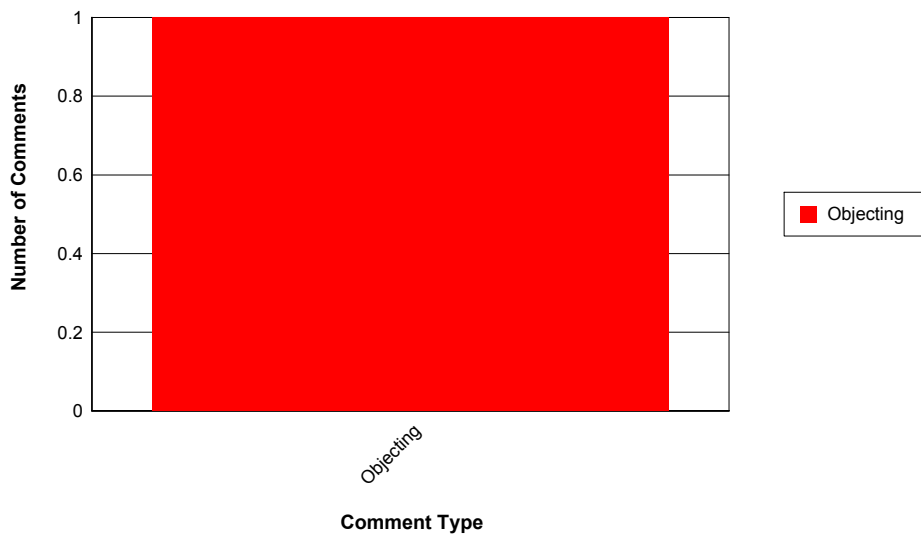
Organisation
St Modwen Developments Limited

Nature of comment
Objecting

Comment

At paragraph 4.1 the additions to the town centre boundary do not seem necessary and could in fact undermine its coherence. The addition of development sites 2, 3 and 4 act as stand alone dense mixed use urban development sites and are not core to the retail, civic and service function of the town centre. It is right that they should be included in the Catford Town Centre AAP but not the definition of the town centre which has key PPS6 implications. These areas are separate from the existing Town Centre and do not help the expansion of its retail and service offer in a logical manner.

Summary of Comments



Section 4.1.1

Respondent ID
AIFa9t15LoSW1P 4RR

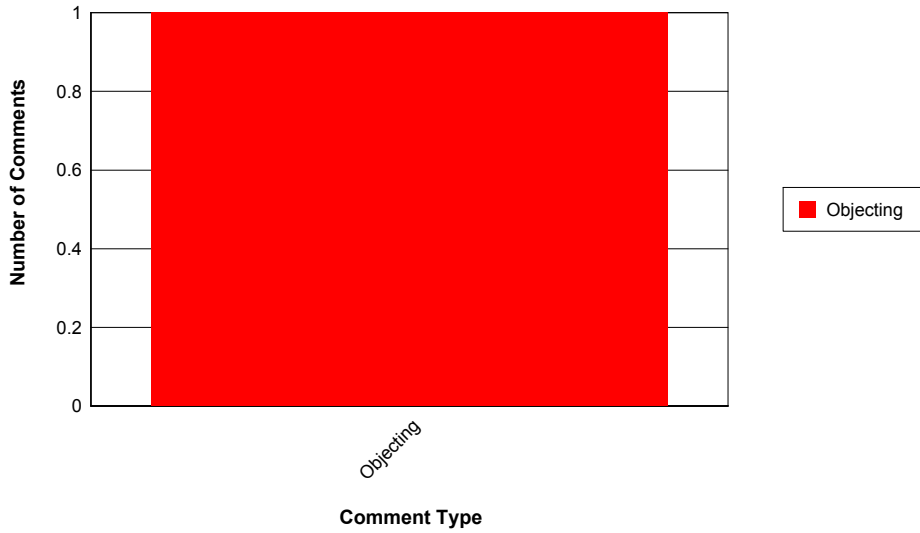
Organisation
Government Office For London

Nature of comment
Objecting

Comment

At the end of each section you provide a reasoned justification which considers national, regional and the Community Strategy. This is helpful as far as it goes but it often lacks detail, does not refer to other local strategies, and it is not always clear as to which ' draft policy it applies to. An example of this can be seen in the reasoned justification after policies CAAP14 (Development and accessibility) - CAAP23 (Walking and cycling).

Summary of Comments



Section 4.4

Respondent ID

GeCoCIVaReBeRG1 8DB

Organisation

Thames Water Property Services

Nature of comment

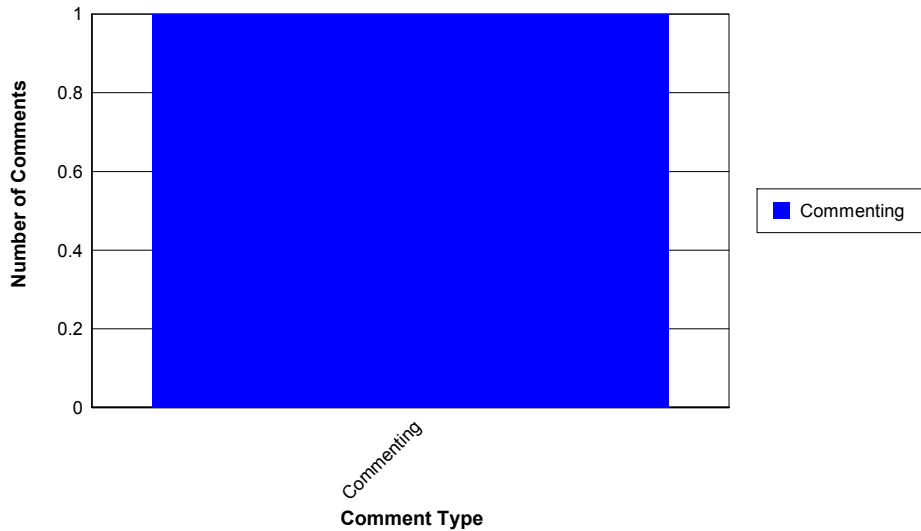
Commenting

Comment

Tree Strategy and Planting –

Thames Water recognises the environmental benefits of trees and encourages the planting of them. However, the indiscriminate planting of trees and shrubs can cause serious damage to the public sewerage system and water supply infrastructure. In order for the public sewers and water supply network to operate satisfactorily, trees, and shrubs should not be planted over the route of the sewers or water pipes.

Summary of Comments



Section 4.5

Respondent ID	Organisation	Nature of comment
GeCoCIVaReBeRG1 8DB	Thames Water Property Services	Commenting

Comment

Access –

Thames Water will require 24 hour vehicular access to any pedestrianised area to undertake emergency works. Access to the sewerage and water supply infrastructure must not be impeded by street furniture. This will enable Thames Water to operate the network with as little interruption to the service as is possible.

Respondent ID	Organisation	Nature of comment
PaBl1BLoDoRH4 1SZ	Highways Agency	Commenting

Comment

1.Thank you for inviting the Highways Agency (HA) to comment on Lewisham's Local Development Framework Preferred Options Consultation.

2.The HA, on behalf of the Secretary of State for Transport, is responsible for managing and operating a safe and efficient Strategic Road Network (SRN) {i.e. the Trunk Road and Motorway network) in England as laid down in Department for Transport (DfT) Circular 02/2007 (Planning and the Strategic Road Network). I have attached a link to the new circular for your convenience.

<http://www.dft.gov.uk/consultations/aboutria/ria/revisedcircularplanningandsrn>

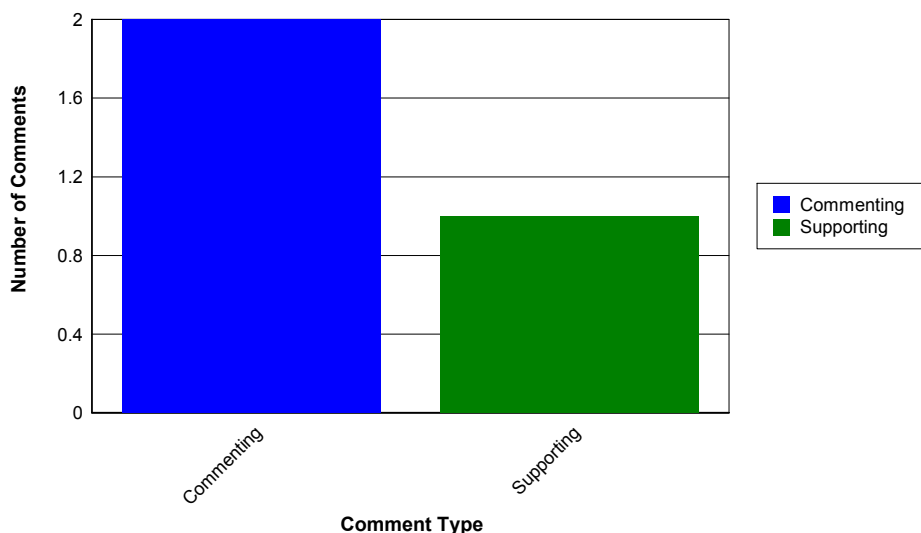
3.The HA do not wish to comment on the Preferred Options.

Respondent ID	Organisation	Nature of comment
GiDoCiThLoSE1 2AA	Greater London Authority	Supporting

Comment

Overall TfL considers both AAPs to be extremely positive in transport terms. Both AAPs seek to encourage more sustainable forms of transport, particularly walking and cycling. Car parking standards conform with the London Plan and the documents show that joint working exists between the borough and TfL, which is welcomed. The documents would benefit from some minor changes where references could be made to TfL's cycling and walking plans as well as TfL's Best Practice Guidance on Transport Assessments. TfL will continue to work with the borough to assist in delivering the transport improvements necessary to meet the identified development and regeneration needs. TfL expects the borough to maximise car free developments and seek Section 106 contributions to mitigate their impacts upon the public transport network.

Summary of Comments



Section 4.6

Respondent ID
GeCoCIVaReBeRG1 8DB

Organisation
Thames Water Property Services

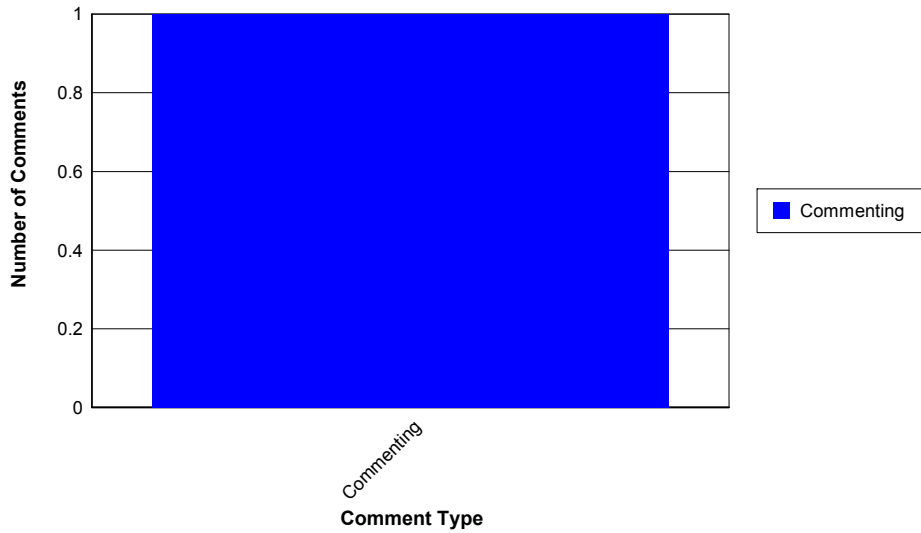
Nature of comment
Commenting

Comment

Catering Establishments -

Thames Water would like Grease Traps to be installed in all catering establishments. These Traps must be regularly cleaned and maintained. Failure to enforce the effective use of grease traps will result in the build up of food deposits in sewers and drains. This can cause blockages and flooding resulting in emergency cleaning. These food deposits may also encourage the migration of rodents into the sewerage system and encourage their proliferation.

Summary of Comments



Section 5.0

Respondent ID

J Pa5 CuCaLoSE6 2LE

Organisation**Nature of comment**

Commenting

Comment

The overall plan lists additional retail outlets on all 5 development sites. I am hoping that this will not mean that Catford will become a 'uniformity town' - where one finds the same shops on every High Street. The possible expansion of a supermarket also fills me with dread!

Respondent ID

AlFa9t15LoSW1P 4RR

Organisation

Government Office For London

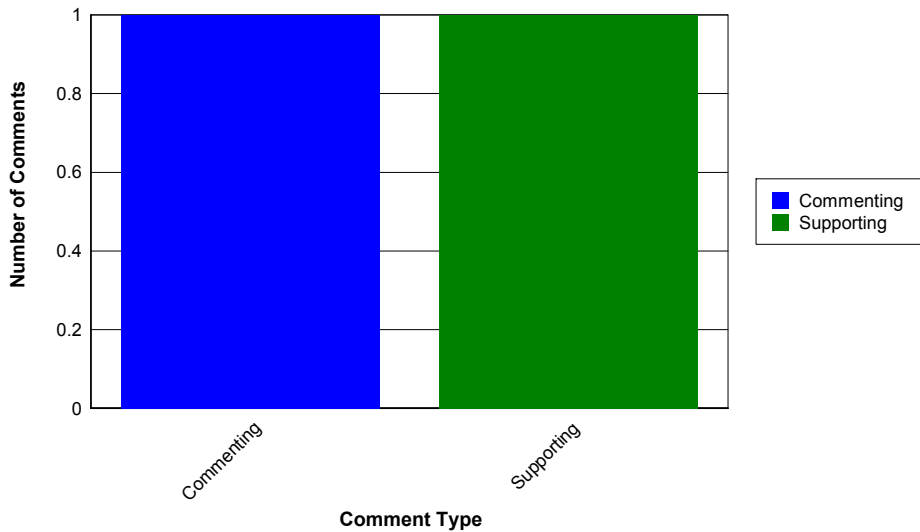
Nature of comment

Supporting

Comment

Your proposals for the 5 key sites you wish to take forward within this document are set out in section 5. You provide a description of each site, along with potential opportunities and constraints and key design considerations, which is helpful in setting the scene and hopefully will result in more meaningful responses from this consultation. Your aims for redeveloping each site is set out in draft policy.

Summary of Comments



Section 6.0

Respondent ID
AIFa9t15LoSW1P 4RR

Organisation
Government Office For London

Nature of comment
Objecting

Comment

Section 6 provides details in general terms on the monitoring and implementation you are looking to put in place to aid the delivery of policies to bring forward these sites. This is useful as far as it goes but I consider that the following issues have not been adequately addressed:

-Have you secured funding to take forward the redevelopment of the five sites in both the short and long term?

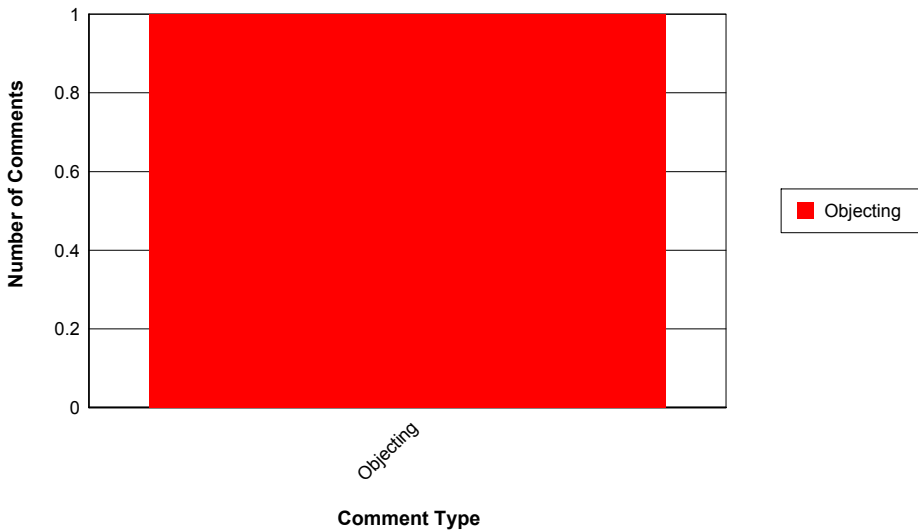
-How will these proposals be phased?

-Do you have the co-operation from all of the local owner/occupiers? If not will this prevent the regeneration of a site/sites should you not be able to use compulsory purchase powers?

-You indicate that you are in negotiations with Transport for London and other transport partners regarding the realignment of the South Circular. What options do you have for taking forward the redevelopment of the Civic Quarter and South Circular site if this does not go ahead?

- To deliver the redevelopment of the site you say that you will encourage partnership working with a range of groups including, the Lewisham Strategic Partnership, public organisations and agencies, local residents/community groups/businesses. Has work on this started, how will you get all of these partners to work together and agree to your proposals and what options do you have in place should you not get buy-in from all of the interested stakeholders? Under the tests of Soundness this relates to test (viii).

Summary of Comments



Section 6.1

Respondent ID	Organisation	Nature of comment
ChAmEa30LoSE1 7TL	Environment Agency	Commenting

Comment

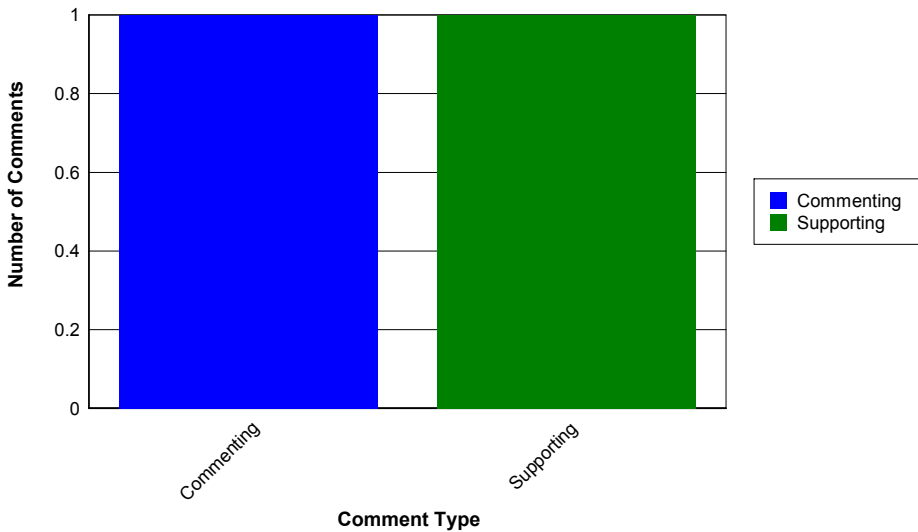
We welcome the inclusion of the Environment Agency as one of the key delivery partners. By continuing to work closely together at all stages we can ensure new development addresses environmental issues and achieves environmental protection and enhancement. The AAPs offers the opportunity to produce development with the highest environmental standards. We would like to work with you on the best ways to manage and improve the green infrastructure and on achieving significantly improved water and energy efficiency.

Respondent ID	Organisation	Nature of comment
FrRo30HiOrKeBR6 0NN	St Dunstans College Educational Foundation	Supporting

Comment

The School supports the implementation framework strategy set out in Section 6 in order to bring about the necessary investment in the area and the desired environmental improvements as quickly as possible. The School would welcome the opportunity to be a working partner for the purposes of implementation and to be included in the list in Section 6.1. The School is confident that given the opportunity to do so it can contribute effectively to the provision of enhanced community infrastructure in this part of Catford.

Summary of Comments



Section 6.4

Respondent ID	Organisation	Nature of comment
MaRoMo26LoEC1A 2AT	Metropolitan Police Authority	Commenting

Comment

The MPA are mindful that PPS1 states that Councils should prepare development plans which promote inclusive, healthy, safe and crime free communities. Also Circular 05/05 paragraph B9 advises developers may be expected to pay for or contribute to the cost of all, or that part of additional infrastructure provision, which would not have been necessary, but for their development.

The MPA are mindful that significant additional development is likely to come forward in the 5 Development Areas over the coming years, through the introduction of new uses and the intensification of employment and housing activity. The scale of development will significantly increase demands on police resources, and the MPA believe it is reasonable for planning contributions to be sought for policing needs through Section 106 agreements where these are consistent with the policy tests in Circular 05/05.

Having regard to the above the MPA request that the Property Services Department of the Metropolitan Police Authority are formally consulted when any significant planning applications are submitted to the Council within the Catford Town Centre Area Action Plan area. Consultation should be forwarded to:

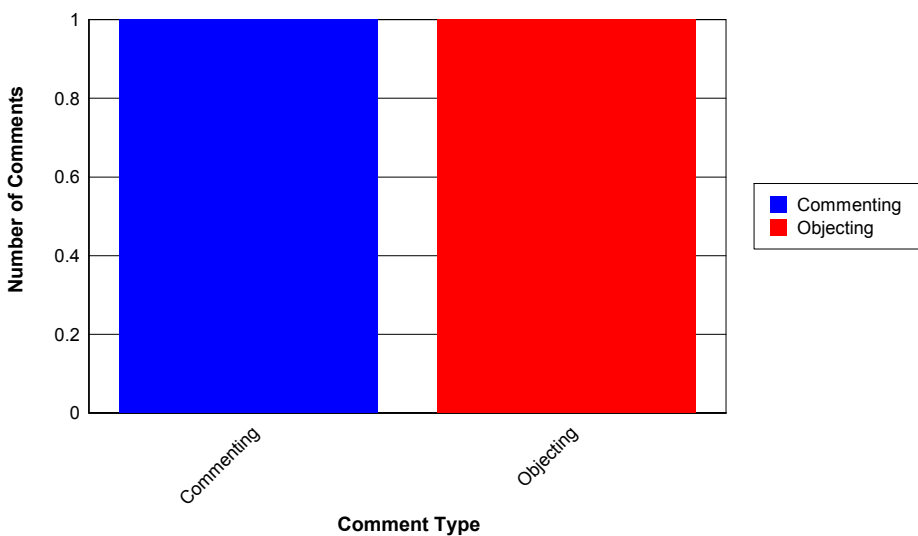
Metropolitan Police Service
Director of Asset Management
Property Services
12th Floor, Empress State Building
Empress Approach
Lillie Road
London SW6 1TR

Respondent ID	Organisation	Nature of comment
NiFi9 LoW1U 1HL	St Modwen Developments Limited	Objecting

Comment

Section 6.4 regards the use of Compulsory Purchase Powers. We do not believe that CPO powers will be necessary in terms of the Catford Shopping Centre and Milford Towers and this is not the appropriate way to proceed. It would only be appropriate if issues with other owners could not be resolved and this threatened a comprehensive development.

Summary of Comments



Section 6.5

Respondent ID
GiDoCiThLoSE1 2AA

Organisation
Greater London Authority

Nature of comment
Commenting

Comment

Comment: In accordance with London Plan Policy 6A.4 priority interventions should also include provision or contribution towards childcare. This will assist with removing barriers to employment for local people.

Respondent ID
NiFi9 LoW1U 1HL

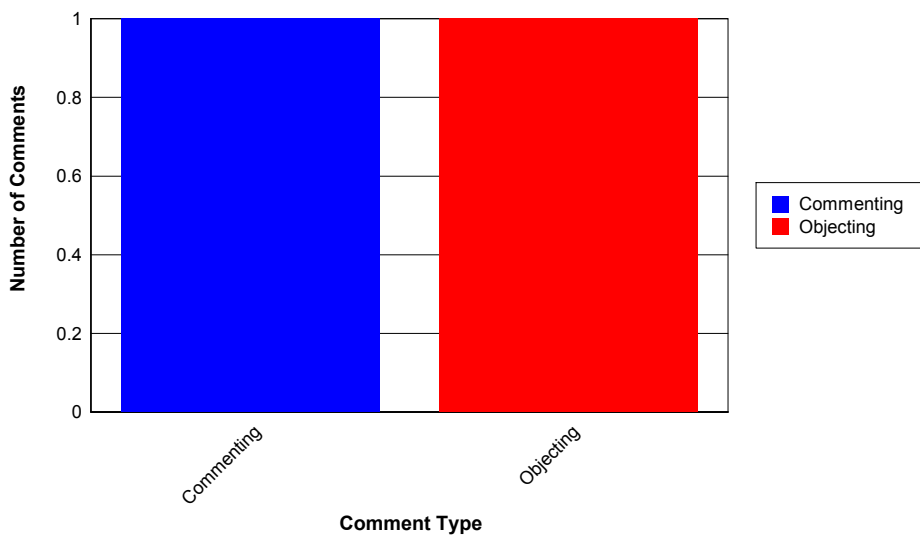
Organisation
St Modwen Developments Limited

Nature of comment
Objecting

Comment

Section 6.5 regards developer contributions via section 106. S106 contributions should be ring-fenced for Catford AAP related improvements and those that relate to a specific development, not added to a single pool.

Summary of Comments



Section A3.3

Respondent ID
FrRo30HiOrKeBR6 0NN

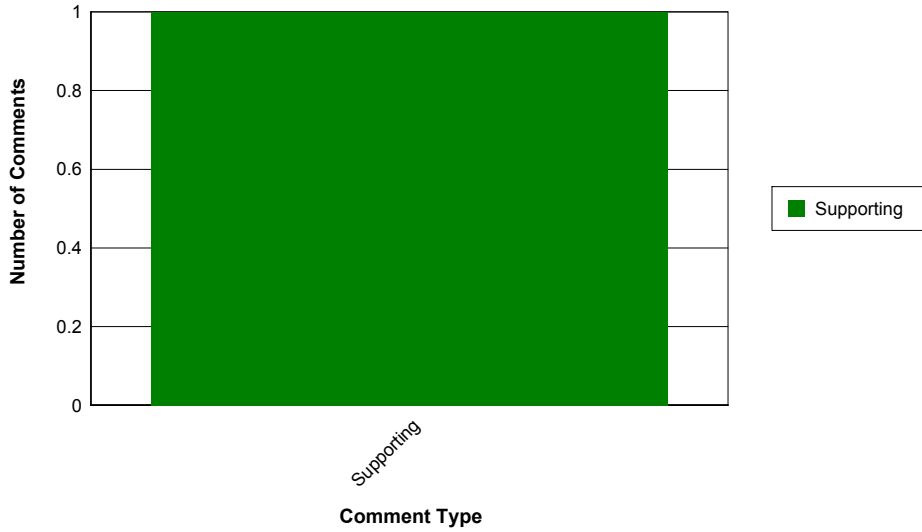
Organisation
St Dunstons College Educational Foundation

Nature of comment
Supporting

Comment

The School supports the analysis set out in paragraph A3.3 in relation to the poor quality of the existing public transport facilities.

Summary of Comments



Section A3.5

Respondent ID
FrRo30HiOrKeBR6 0NN

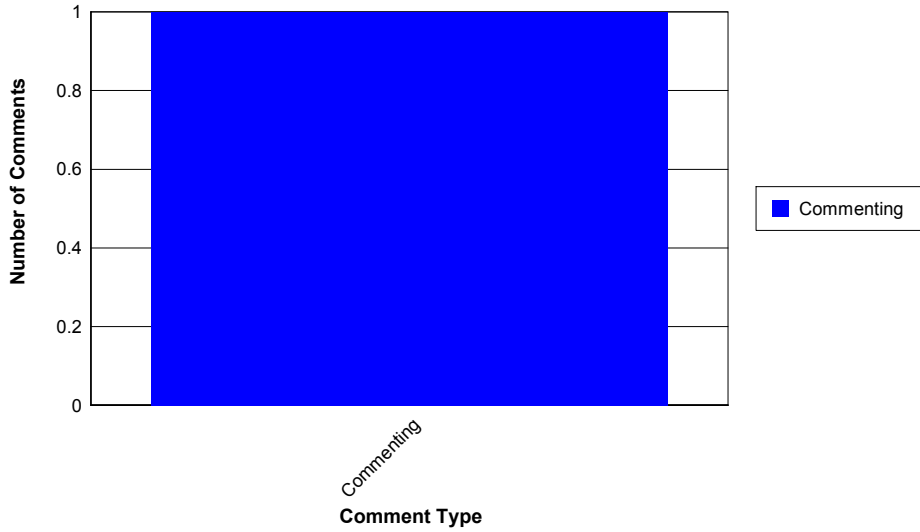
Organisation
St Dunstons College Educational Foundation

Nature of comment
Commenting

Comment

Again the School should be recognised in the list set out in paragraph A3.5 as being a civic, cultural and leisure facility serving this part of the town centre.

Summary of Comments



Comments relating to Pages

Respondent ID
GiDoCiThLoSE1 2AA

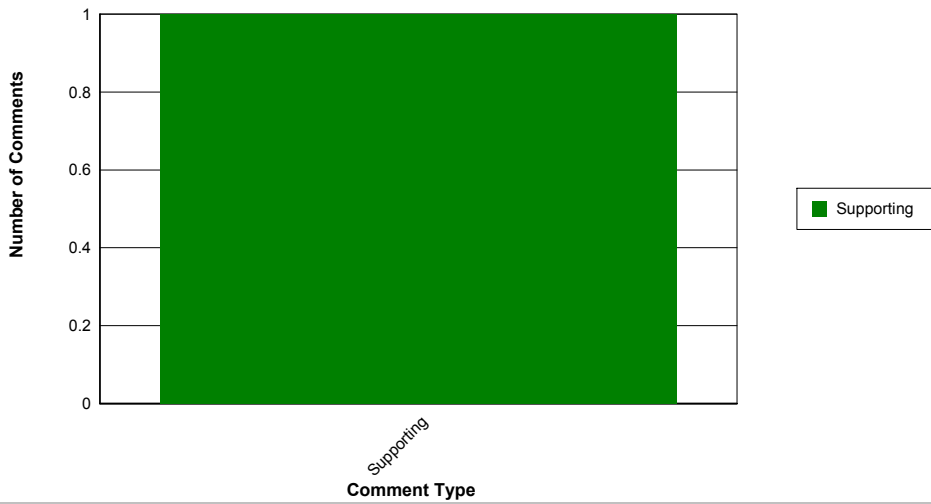
Organisation
Greater London Authority

Nature of comment
Supporting

Comment

The draft Development Plan Documents are largely supported.
A number of strategic issues are raised in the AAPs, particularly the borough wide affordable housing target, and the relaxed approach taken to employment land. It is acknowledged that GLA officers and the Council are in discussions regarding these issues, and it is hoped that a successful resolution can be reached. In addition, concern is raised regarding the need to secure decentralised energy at the town centre level.

Summary of Comments



Comments sorted by Respondent

Chapter	Section	Page	Policy	Nature of comment
4	4.4	20	CAAP12	Commenting

Comment

Thank you for consulting the Commission for Architecture and the Built Environment (CABE).

Unfortunately, due to limited resources, we are unable to comment on this document. However we would like to make some general comments which you should consider.

1.Design is now well established in planning policy at national and regional levels, and LDFs offer an opportunity to secure high-quality development, of the right type, in the right place, at the right time.

2.Robust design policies should be included within all LDF documents and the Community Strategy, embedding design as a priority from strategic frameworks to site-specific scales.

3.To take aspiration to implementation, local planning authorities' officers and members should champion good design.

4.Treat design as a cross-cutting issue - consider how other policy areas relate to urban design, open space management, architectural quality, roads and highways, social infrastructure and the public realm.

5.Design should reflect understanding of local context, character and aspirations.

6.You should include adequate wording or 'hooks' within your policies that enable you to develop and use other design tools and mechanisms, such as design guides, site briefs, and design codes.

You might also find the following CABE Guidance helpful.

- "Making design policy work: How to deliver good design through your local development framework"
- "Protecting Design Quality in Planning"
- "Design at a glance: A quick reference wall chart guide to national design policy"

These, and other publications, are available from our website www.cabe.org.uk

Catford Timber Company

Chapter	Section	Page	Policy	Nature of comment
5	5.2	45	Development Opportunity Site 2	Commenting

Comment

The future of Catford Town Centre has always been related to the traffic problems inherent;the South Circular Road crosses the main London/Coast Road

In the past plans have been raised for a solution to this, the main problem faced,that is to separate people from traffic.

Local people are not unaware of the high number of pedestrian deaths within the Catford Gyratory scheme An underpass was ruled out because of a large number of springs in the area.

It would be interesting to see the exact route and traffic flow of the proposed re-alignment of Catford Road to the south of Laurence House,and what,if any, assistance would be given to relieve the volume of through traffic passing into the centre.

It would be better to prioritise a safe traffic scheme before increasing residential volumes, that is: to make the area safe.

Church Commissioners

Chapter	Section	Page	Policy	Nature of comment
5	5.3	49	Development Opportunity Site 3	Objecting

Comment

On behalf of the Church Commissioners for England, King Sturge are instructed to object to draft Policy 5.3.7 and related Figure 9 of the above Area Action Plan.

In brief, it is felt that the safeguarding of two alternative road schemes is unreasonable, and blights future redevelopment opportunities through uncertainty. Furthermore, the plan does not show how development may be phased, given the variety of different land ownerships to the north of the retail park. It is also unclear as to what Community and Leisure Uses the Council are referring to in Paragraph 5.3.7(e) of the document.

Chapter	Section	Page	Policy	Nature of comment
5	5.3	49	Development Opportunity Site 3	Supporting

Comment

The site is identified as "Plassy Road Island, Development Opportunity Site 3" in the Preferred Options Area Action Plan for Catford. The Church Commissioners welcome a site specific designation for the site, and the recognition that the retail park is an under-utilised opportunity site, where a greater intensification of uses is appropriate.

Nevertheless, the draft policy and related diagram have raised a number of concerns which need further consideration if the Church Commissioners are to support the document.

The main areas of contention are as follows:

- Uncertainty over road scheme and unrealistic safeguarding of two options.
- No reference to land assembly constraints.
- Ambiguity over the Community and Leisure uses that Policy 5.3.7(e) seeks to protect.

Chapter	Section	Page	Policy	Nature of comment
5	5.3	49	Development Opportunity Site 3	Objecting

Comment

Uncertainty over the Road Scheme

There are currently two alternate road schemes being considered by Transport for London and Lewisham Council to widen the A 205 South Circular Road.

The widening of Sangley Road has been a longstanding option, safeguarded in various plans since 1982. Frustratingly, no scheme has been delivered to date. Nonetheless, the current safeguarded route set out in the adopted UDP does not impinge upon the eastern Plassy Road side of the retail park. However, the draft LDF now involves the introduction of a landscaped strip to "allow for the option of road widening". If implemented, this option would necessitate the loss of both McDonalds and Mecca Bingo, reducing the amount of land available for a redevelopment scheme without any further land being made available to the south.

Adding this further safeguarded option blights additional land from development. At the present time there is no approved road scheme to justify such an approach.

The practical problems of safeguarding two options are as follows:

- Potential tenants will be put off by the uncertainty over how close they might be located to a possible road scheme in the future {noise, construction works etc).
- It is unlikely to be commercially viable to deliver a development with a significantly reduced development footprint at the retail park.

King Sturge believes that it is unreasonable to safeguard land for two different options when a decision has yet to be taken on which road scheme will be pursued.

Furthermore, in safeguarding both options for the longer term, the plan proposes a significant landscaped strip along the perimeter of the site. This approach is flawed.

Active frontages need strong visual prominence. Given the site's position off the South Circular, one of the key elements in attracting tenants is the ability to market to passing bus passengers and motorists. The rationalisation of available land due to the protection of two road schemes means that it will not be viable to create sufficient set back for pedestrian circulation behind the landscaping.

The Church Commissioners also question how separate accesses to residential and retail uses can be created with a reduced site area.

Solution: Remove Plassy Road Landscape Strip which protects alternative road option.

Chapter	Section	Page	Policy	Nature of comment
5	5.3	49	Development Opportunity Site 3	Objecting

Comment

Land Assembly and Phasing

Understandably, the Council has looked at Plassy Road Island as a single development site. However, it is highly unlikely that the regeneration of the entire opportunity site can be achieved in a single tranche of development; especially as this will involve assembling a number of separate land ownerships.

As there is a danger that development could be gridlocked by differing commercial interests and timescales, consideration should be given to how the land can be phased.

Whilst the Church has been actively exploring opportunities to acquire other land ownerships, it would be unsound to assume that it is readily achievable. Furthermore, it would be unviable for the Church to acquire more land (and more risk) when there are numerous disparate ownerships to acquire and uncertainty over the road proposals remain.

Without allowing component parts to be developed separately, there is a risk that no scheme will be able to be delivered during the LDF period.

Solution: Identify a scheme of phasing and component parts within the masterplan approach.

Chapter	Section	Page	Policy	Nature of comment
5	5.3	49	Development Opportunity Site 3	Objecting

Comment

Ambiguity over the Community and Leisure uses Policy 5.3.7(e) seeks to protect

Criteria 'e' of Draft Policy 5.3.7 states that there should be "no net loss of community or leisure facilities".

The Church is unclear as to the community facilities the Council are referring to. These should be explicitly stated. For the avoidance of all possible doubt, the Church Commissioners do not consider the Mecca Bingo hall to be a community use but rather a commercial venture operated for profit.

Having dismissed the idea that the Bingo Hall is a community facility, it is also queried whether the unit has any intrinsic value as a leisure use. Although the Use Class Order considers Bingo Halls to fall under class D2 (Assembly and Leisure), the activities taking place on site are comparable to a betting office (A2) or Casino (Sui Generis). Therefore the Church Commissioners strongly dispute the need to afford the unit protection.

In terms of benefit to the community, housing and improved retail offer would help regenerate the island better than a re-provision of this D2 use.

It should also be noted that The Church Commissioners are not permitted to profit from gambling activities. It is untenable that a redevelopment of the retail park could take place if a policy were to remain that could potentially protect (or require a re-provision of) the Bingo Hall.

Solution: Remove Paragraph (e) or explicitly state the community uses that should be protected. This should not include Mecca Bingo.

Chapter	Section	Page	Policy	Nature of comment
5	5.3	49	Development Opportunity Site 3	Supporting

Comment

The Church Commissioners support the Council's view that the Plassy Road site is underutilised, and opportunities for intensification exist. Following Lewisham's informal advice the Church are considering a mix of uses on the site, including housing. Introducing a mix of uses on to the site will be challenging (for example, division of access and car possible parking), but is also supported by the Church Commissioners.

Integrating the site into the town centre is also an aim shared by both parties. This will increase activity in the area, and "open up" the site for other activities.

Chapter	Section	Page	Policy	Nature of comment
5	5.3	49	Development Opportunity Site 3	Objecting

Comment

The Church Commissioners are enthusiastic about redeveloping the site, and wish to work with Lewisham to regenerate this area of Catford Town Centre. The objective of intensifying uses and improving links with the town centre is strongly supported. Notwithstanding this, the draft policy and diagram included in the Action Plan needs refining.

The Church Commissioners object to the marginalisation of the development footprint through the safeguarding of two possible road options. The prospect of introducing temporary landscaping along Plassy Road until this is resolved is flawed as this would conflict with the creation of active frontages.

Given the complex nature of the site and the various land ownerships outside the retail park, the document should also make reference to phasing and how development is to be brought forward.

Finally the reference to community and leisure uses is ambiguous. The Church strongly advises that this element of the policy is deleted.

English Heritage

Chapter	Section	Page	Policy	Nature of comment
1	0	2	GENERAL	Commenting

Comment

Thank you for your letters dated 17 August 2007 consulting English Heritage on the above document.

Owing to the volume of work that is being generated by the introduction of the new planning arrangements and Strategic Environmental Assessment, we are finding it necessary to prioritise which consultations we are able to respond to.

In broad terms, we are endeavouring to respond to consultations where we consider that there are likely to be significant implications for the historic environment. In our assessment the Lewisham has local historic environments of significance by virtue of the conservation areas and archaeological areas throughout the borough. The council's in-house conservation and archaeological advisers should be involved in discussion on the impacts of the plan's policies on these areas.

Although we have not been able to provide a response at this stage, I must stress that this does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the document which is the subject of the consultation, and which may, despite the sustainability appraisal, have adverse effects on the historic environment.

English Partnerships, Countryside Properties & HHA

Chapter	Section	Page	Policy	Nature of comment
5	5.4	53	Development Opportunity Site 4	Objecting

Comment

With our development partners Hyde Housing Association and Countryside Properties, we are in the final stages of preparing a planning application for the comprehensive redevelopment of our land holding at the former Catford Greyhound Stadium and Station Gateway to provide for a high quality residentially-led mixed use scheme. We have reviewed the draft Catford Town Centre Area Action Plan (CAAP) and support the inclusion of our site within it. However, there are aspects of the document that we consider require amendment and we have therefore set out below our objections following the paragraph and text references found in the CAAP.

The first point to note is that there appears to be a typing error in the document. On page 36 (Introduction to the Development Opportunity Sites (DOS)), our site is identified as Development Opportunity Site 3; however, further into the document, Site 3 refers to Plassey Road and our site is Development Site 4. We ask that this be clarified in any subsequent drafts of the CAAP.

Chapter	Section	Page	Policy	Nature of comment
5	5.4	53	Development Opportunity Site 4	Supporting

Comment

We generally welcome the Council's continued support for redevelopment of this site and its consideration that development will act as a catalyst for improving the image of Catford Town Centre. We are also pleased that the Council through its CAAP continues to see that a residentially-led mixed use scheme incorporating small scale community and retail/commercial is the most appropriate development/use for the site. However, notwithstanding this we do have the following comments to make.

Chapter	Section	Page	Policy	Nature of comment
5	5.4	53	Development Opportunity Site 4	Objecting

Comment

A key aspiration of the CAAP is to deliver a high quality public space between the Catford and Catford Bridge railway stations, provide for a new Catford station ticket hall building, improve linkages to Catford Town Centre and to improve and naturalise the River Ravensbourne. This investment is required because the Council's considers this site crucial in delivering improved environmental quality and permeability to Catford Town Centre that will positively enhance the character of the area as a whole. EP shares this view and is prepared to contribute, as far as is reasonably possible, towards the significant costs involved in these works, as part of its developer contributions should planning permission be granted.

However, we believe the improvements in the area will be of benefit to Catford as a whole, including the other DOS. Despite this, we note that the other DOS are not obliged to contribute to the Gateway improvements, the implications being that the entire cost of the improvements should fall on our site. We do not consider this to be reasonable as it will place an overbearing cost onto EP as the first developer/investor to kick-start the regeneration of Catford Town Centre and we must therefore object. We believe that there should be a mechanism for the other DOS to contribute to the Station Gateway improvements in recognition of the fact that they will impact upon this area and benefit from any enhancement of it and the positive knock on effect this will have on Catford as a whole.

Chapter	Section	Page	Policy	Nature of comment
5	5.4	53	Development Opportunity Site 4	Objecting

Comment

5.4.3, 5.4.5 and 5.4.7 Draft policy

All 3 paragraphs make reference to the constraints of the site recognising the main sewer line running its entire length as well as the railway lines, the park and the road acting as constraint barriers. Of particular concern are the statements in Paragraph 5.4.5 which states that "the sewer line should not dictate the site layout" and paragraph 5.4.7 a) which states " A layout that provides for open space and is not dictated by the sewer line". The CAAP does not acknowledge that with each constraint, an easement exists where no building works are permitted. The sewer pipe requires a five metre easement either side of it whilst the Environment Agency have set an eight metre easement either side of the River Ravensbourne. In addition, Network Rail have insisted a two metre easement must exist adjacent to the boundary of the retained railway lines.

These constraints can not be moved or ignored through the redevelopment process and it demonstrates a lack of understanding of the magnitude of the issues they present to suggest that they should not dictate site layout. They do dictate where development can and can not be located so inevitably, they have a large bearing on the design of the development proposed. However, our client team has spent nearly two years working on a masterplan for the site in full co-operation with Lewisham's Planning Officers to deliver a proposal that tackles both the constraints and opportunities of the site in a comprehensive, high quality and sustainable manner. Therefore, we object to the current wording of the draft CAAP on this matter and ask that it be amended to realistically represent the challenges presented by the immovable constraints on site.

Chapter	Section	Page	Policy	Nature of comment
5	5.4	56	Development Opportunity Site 4	Objecting

Comment

Figure 11

We believe our forthcoming planning application responds positively to all the challenges set down within this plan. However, the proposed cycle link (Point C) will be incorporated within the new footbridge to be constructed in position T on the diagram. The new footbridge at the centre of the site will provide a direct linkage into the town centre and will adequately serve the needs of the surrounding residents where there is currently no crossing. A second access at Point C would add little to the permeability of the area and we consider is both unnecessary and unviable, bearing mind the likely cost of construction. We therefore object to the requirement for a crossing at Point C.

Chapter	Section	Page	Policy	Nature of comment
5	5.4	56	Development Opportunity Site 4	Objecting

Comment

Figure 11

With regards to a second station entrance for Catford station (Point K), this option has been rejected by Network Rail on operational grounds. On this basis, there is no realistic prospect of it materialising and we consider this option should be removed from the draft CMP. In terms of Points Q and R, the draft CAAP implies that the improvements to the junction with Catford Road will be undertaken by us as part of our development. This is not the case as the works required are the responsibility of TfL. We therefore object to the current notation ask that it be amended accordingly.

Chapter	Section	Page	Policy	Nature of comment
5	5.4	56	Development Opportunity Site 4	Objecting

Comment

Figure 12

We wish to object to the use of this image in this document. Any reader may expect this to be what is going to be delivered on the site yet we have never been consulted on its use and it does not reflect any discussion we have had with regard to the site. It is impractical to provide crossings D and E and equally, the image shows that the River Ravensbourne sits level with the road when it is in fact set much lower down. We would be happy to provide you with alternative more accurate images that have been prepared as part of our impending application, but in the meantime, object to the use of the images shown.

Environment Agency

Chapter	Section	Page	Policy	Nature of comment
1	0	2	GENERAL	Commenting

Comment

The Environment Agency is pleased to see that most of the key environmental issues have been addressed. A key message emerging from PPS1 is that development can (indeed should) be seen as a tool of environmental enhancement rather than as a source of environmental degradation, as in the past. Paragraph 19 suggests that adverse environmental impacts should be avoided if possible, mitigated against, if unavoidable, and/or compensated for (possibly elsewhere) if mitigation measures are only partially successful.

The Environment Agency considers new development in urban areas an opportunity to create enhancements and opportunities for biodiversity. The AAP provides an ideal opportunity for enhancement of low value conservation sites and create and enhance ecological networks and ecologically resilient and varied landscapes, to support a range of species

Improving and linking green spaces to local residents and wider population and visitors is very crucial and we welcome proposals for the improvement and enhancement of the public realm. In particular we see development as an opportunity for the green spaces to become a major educational and community resource. Providing new and attractive green grid style development, improving entrance ways and knowledge of parks, enhancing and possible extension of the existing green spaces, would be welcome development.

We would recommend increased environmental recreation in and around river corridors e.g. increased access to fishing and environmental education. A more informal / softer landscape that connects to the water edge would add a quality of life value for visitor enjoyment and could be an environmental and economic benefit to new development in the area.

Ecological value of the green spaces would be improved by removing hard concrete edges along river corridors and replacing with natural planting and "soft" banks. The Environment Agency would be keen to be involved in enhancements to the green spaces. We can provide examples of enhanced previously "concrete edge" urban lakes and park areas to use as good practice.

The council should require development proposals to include landscaping and other ecological features that contribute towards protecting, managing and enhancing local biodiversity. Information on these measures must be submitted with an application

Applicants proposing major Developments should appoint a suitably qualified ecologist to prepare appraisal of the proposals and, if appropriate a biodiversity action plan for the site.

Chapter	Section	Page	Policy	Nature of comment
4	4.6	27	CAAP27	Supporting

Comment

We support this draft policy. The AAP should ensure that a significant proportion of the energy supply of substantial new development is gained on-site and renewably, and/or from decentralised, renewable or low carbon energy supply and support the use of renewables, CHP and bio fuels. It should promote the use of recycled building materials and materials that have low embodied energy and also promote retrofitting existing buildings to make them more energy efficient

The policy performance would be monitored by comparing - total electricity and gas use, electricity generated from renewable energy sources and CHP located in the area, embodied energy in new buildings and percentage of new homes conforming to recognised codes for sustainable buildings. This information would be obtained from the following sources: -

- Audit Commission Area Profiles-household and individual energy use, by local authority
- Department of trade and Industry(Currently Department for Business and Enterprise)- energy trends
- Environment Change Institute-emissions from buildings, appliances Renewable Energy Statistics Database-renewable energy

Chapter	Section	Page	Policy	Nature of comment
4	4.6	27	CAAP24	Commenting

Comment

Design quality is fundamental to how places work. This may include public spaces that are safe and attractive and buildings that are at appropriate scale and density to support local services. Places that respect their context, using it as a starting point to enhance local character, and so connect, physically and socially, to the surrounding built environment and landscape, are more likely to have a strong, positive identity. A well-designed neighbourhood should also be sustainable socially, economically and environmentally.

Places that are sustainable, functional and distinctive are consequently more attractive to investors and home-buyers alike. Design for environmental performance should be the key. Building Regulations may require new homes to be 'zero carbon' by 2016. The AAP should consider whether existing buildings remain fit for purpose under new climatic conditions.

Quality design should create landscapes that are multi-functional and provide opportunities for water and energy saving. It should also create neighbourhoods where it is convenient and safe to walk or cycle to shops, schools and access to public transport. Well designed places should create mixed neighbourhoods where a range of types and tenures of houses and flats are available for all, where people can move to another home locally when their circumstances change

The AAP should show how the needs of the disabled or older people would be met. It should make the developers understand the access needs of different users and make sure the design allows for inclusive access. Uses open to the public, such as shops, hospitals or hotels, must be accessible to everyone, and homes must be accessible for all visitors. The Disability Rights Commission has produced guidance on access statements. This explains how access should be considered from the start of the design process through to the building and final use and maintenance of building or space.

Chapter	Section	Page	Policy	Nature of comment
4	4.6	28	CAAP28	Commenting

Comment

Greening New Development

We would encourage the council to incorporate green roofs in new developments.

Benefits:

Water: Once installed, an average of 75% of rain falling onto extensive green roofs can be retained in the short term. Green roofs can therefore be useful components of SUDS (Sustainable Urban Drainage Systems) schemes and rainwater harvesting schemes.

Air: Vegetation filters particulates from the air and absorbs gaseous pollutants. Roof space is under-utilised and green roofs covering a large enough area could play a role in improving air quality.

Climate change: The presence of vegetation on a roof instead of a flat, bright reflective roof reduces the 'urban heat island'. Research at Trent University has found that on a typical day with a temperature of 18.4oC a normal roof surface temperature was 32oC while that of a green roof was 15oC. In an increasingly warmer climate it is vital to reduce ambient air temperatures where possible.

Biodiversity: Green roofs are good for wildlife, if designed with this in mind. They can help achieve Biodiversity Action Plan targets and can support protected species: roofs in the UK are known to support skylarks, Black Redstarts, plovers, terns, invertebrates, reptiles and even rare orchids.

Landscape: Green roofs create attractive open spaces to look at or screen less pleasant areas such as equipment areas. They provide an additional area of green space and contribute towards the implementation of green infrastructure strategies.

Social: Contact with green space and nature offers real social and health benefits. In a densely urban area, green roofs can play a role in access to nature, for example, by acting as outdoor classrooms.

Energy and Sustainable construction: Protecting the roof from sunlight and temperature fluctuations means a longer life for the roof and reduced energy costs such as heating and air conditioning. Research carried out recently has shown that green roofs can reduce energy usage in buildings by 25%.

Waste: Recycled materials can be used on green roofs such as crushed brick and aggregates from the site itself, reducing the amount taken to landfill.

Chapter	Section	Page	Policy	Nature of comment
4	4.6	28	CAAP30	Commenting

Comment

Planning for SUDS early in a project's design is essential to enable integration of the system into the overall site concept and layout, and agreement on adoption, maintenance and operation of the systems. For good practice, this draft policy should be informed by the following:

Apartments

- In high-density developments there is likely to be insufficient space for balance ponds or infiltration basins. The most suitable approach may be to use modular cellular storm water tanks that provide large holding capacities for infiltration. These can be located under parking courts, service areas or landscaping and combined with permeable hard surfaces

- Roof water run off can also be mitigated by use of rainwater harvesting (which can be stored for uses such as w.c. flushing and irrigation), and by the use of green roofs which can reduce run off by 50% or more

Medium Sized Housing

- Water butts installed on rainwater down pipes provide a simple contribution towards reducing storm water run off.

- Where ground conditions are appropriate, surplus water can be directed to soakaways.

- Community SUDS schemes, with run off collected from a number of houses and directed to a basin or balanced pond (discharge to a water course or mains drain via a hydrobrake) can provide an attractive landscape and wildlife feature

- Permeable paving for driveways, access roads and parking areas

Large Housing

- Water butts should be installed on rain water down pipes

- In lower density developments there is likely to be more space available for some SUDS features, such as soakaways, swales and infiltration basins

- Large driveways and parking areas should be surfaced with permeable paving, or constructed to drain to adjoining soft surfaces. Using permeable paving will benefit the future growth of mature trees by maximising the area of soil moisture recharge

Chapter	Section	Page	Policy	Nature of comment
4	4.6	28	CAAP29	Commenting

Comment

Flooding has implications for the Borough not only in terms of the constraint it places on the location of new development but also as an issue which sits with other 'climate change' related matters. For this reason it is preferable to have both strategic and detailed policies. A detailed policy on flooding is placed within this AAP because of its significant spatial implications in the Opportunity Areas. This proposed Policy will deal with a wide range of actions to reduce flood risk and is intentionally presented in a comprehensive manner to most clearly convey the Environment Agency and the Council's approach.

A significant area of both Lewisham and Catford Town centres lies in the floodplains of the River Ravensbourne and its tributaries. The Environment Agency Thames Catchment Flood Management Plan (Thames CFMP) (September 2006) confirms the above and sets out some main messages:-

- a) Flood defences cannot be built to protect everything.
- b) Localised defences might be developed.
- c) The ongoing cycle of development and urban regeneration is a crucial opportunity to manage flood risk.
- d) Land for future flood risk management will be identified and protected by authorities.

The Environment Agency is not objecting to the redevelopment of Lewisham town centre and is satisfied that development will not cause an increase in flood risk. A comprehensive approach to dealing with flooding and its risks has been followed to avoid adding to the risks to people and property and to seek to reduce the extent of flooding. A refined modeling submitted by the council and developers has removed a number of instabilities within the previous River Ravensbourne model which has improved its accuracy. This includes aspects such as a better demonstration of the way culverts respond to flood flows. Under the proposed scheme, the model shows that there is no raising or backing up of 1 in 100 year flood levels including a 20% allowance in peak river flows for climate change in the River Ravensbourne. There is a slight increase in water levels under the same scenario in the River Quaggy. However, there is sufficient freeboard (safety factor) from peak water levels to surrounding ground levels for us to be confident that flood risk is not increased as a result of the proposals.

Removing the existing flood risk from people and property by relocating development is not always a realistic option because of the enormous costs and lack of alternative land outside the flood risk area. A sequential approach of ensuring new development is only in areas not at flood risk would on its own fail to deal with the risks faced by those already living or having businesses in flood risk areas. A pragmatic application of sequential approach to new development would realise the opportunity identified in the Thames CFMP and PPS25 to use development as a way to help manage and reduce flood risk. It would ensure that the continued role of the Town Centres in particular, as a sustainable and accessible location for many facilities including as major shopping centres, could be fully maintained to meet the needs of local residents.

The proposed policy also seeks to ensure the capacity of the flood plain is both preserved, and, where possible, through appropriate development, increased and impendance to the flow of floodwater is, if possible, reduced. Redevelopment of existing developed sites in flood risk areas for less vulnerable uses will be supported where they achieve reductions in flood risk through increased flood storage capacity and reduced impendance to flood water flow. Account is taken in the policy of the impact of climate change by highly vulnerable uses not being permitted in the 1 in 1000 (Zone 2) flood area and development in this area otherwise being required to be flood resistant/resilient. More stringent controls on development are made in the 1 in 20 flood risk area (Zone 3b) (referred to in PPS25 as 'functional flood plain') These are areas of generally fast flowing floodwater in major flood events where there are particular risks to people and property.

All applications covered by the provisions of the policy will require an appropriate Flood Risk Assessment. This includes sites over 0.5ha, or 10 dwellings or more or over 1000 m2 of non-residential development outside the 1;1000 flood risk area in Zone 1 because surface water flooding into the flood plain from outside it can contribute to flood risk. The extent of the 1 in 20 (Zone 3b), 1 in 100 (Zone 3a) and 1 in 1000/ (100+20% for climate change) (Zone 2) where the SFRA will indicate.

Chapter	Section	Page	Policy	Nature of comment
4	4.6	28	CAAP29	Objecting

Comment

Proposed Policy – Flooding

The Council will seek to reduce flood risk and its adverse effects on people and property in Lewisham and Catford Town Centres by:

- a) appropriate comprehensive flood risk management measures within or affecting the Town Centres which are agreed by the Environment Agency,
- b) reducing the risk of flooding from surface water and its contribution to fluvial flooding by requiring all developments of one or more dwellings and all other development over 500m² of floor space in the Town Centres to have appropriate sustainable drainage schemes, Floor levels for the buildings will be set at a minimum level of the 1 in 100 year flood level plus climate change allowance with an additional 300mm 'freeboard' added to that level.
- c) maintaining flood storage capacity within flood Zone 3 by refusing any form of development on undeveloped sites which reduces flood storage capacity or impedes the flow of flood water
- d) maintaining the effectiveness of the more frequently flooded area (Zone 3b) of the flood plain to both store water and allow the movement of fast flowing water by not permitting any additional development including extensions,
- e) not permitting residential development or change of use or other 'more vulnerable' uses within Zone 3a or 'highly vulnerable uses' within Zone 2 where flood risks cannot be overcome.
- f) supporting the redevelopment of existing developed sites in the Town Centre in Zones 3a and 3b for 'less vulnerable' uses where:
 - i. a minimum increase of flood storage capacity of 20% can be secured (all flood storage areas to be effective at all times throughout the life time of the structure/use and do not create unacceptable risks to people in times of flood)
 - ii. reduces impedance to the flow of flood water where there would be flowing flood water
 - iii. appropriate access for the maintenance of water courses is maintained
 - iv. no adverse impact on the integrity and effectiveness of flood defence structures
- g) requiring any development in Zones 2, 3a and 3b to be designed to be flood resilient/resistant.
- h) requiring all development proposals within Zones 2, 3a and 3b, and development outside this area (Zone 1) on sites of 0.5ha or of 10 dwellings or 1000 m² of non-residential development or more, to be supported by an appropriate Flood Risk Assessment.

Existing riverside access will be maintained and opportunities will be sought to improve access in conjunction with developments in riverside locations.

Chapter	Section	Page	Policy	Nature of comment
4	4.6	28	CAAP28	Commenting

Comment

River Ravensbourne and its Tributaries

Catford and Lewisham have the River Ravensbourne and its tributaries running through them and is a significant local and regional amenity. This proposed Policy aims to ensure that the setting of the rivers is protected and enhanced. This involves protection of landscape features that contribute to the setting and protecting and enhancing views of the river. Particular care will be needed in assessing the visual impact of development proposals in locations that form part of the setting of the river to ensure that the setting is not damaged and that new development makes a positive contribution to the riverside environment.

Proposed Policy: Recreational use of the River Ravensbourne

Facilities which support the recreational use of the River Ravensbourne will be safeguarded and promoted by:

- a) refusing development which involves the loss of facilities unless it can be demonstrated they are no longer required.
- b) supporting the maintenance and provision of visitor facilities, including those for access to the water.

Proposed Policy: River Ravensbourne and its Tributaries

The Council will seek to maintain and look for opportunities to enhance the setting of and increase space for the River Ravensbourne and its tributaries. In considering development proposals it will:

- a) Ensure the protection of landscape features that contribute to the setting of the rivers
- b) Seek to protect and enhance existing views of the rivers
- c) Pay special attention to the design of development located in riverside settings to ensure that it respects and makes a positive contribution to the setting of the rivers
- d) Ensure that the quality of the water environment is maintained
- e) Seek opportunities to improve public access to and alongside the rivers and ensure that existing public access is maintained

Chapter	Section	Page	Policy	Nature of comment
4	4.6	28	CAAP29	Commenting

Comment

Flood Alleviation Scheme

The Environment Agency and other key delivery partners are currently progressing a plan on a major capital scheme to reduce flood risk in Lewisham. This involves the development of a "River Corridor Improvement Plan" for a reach of the Ravensbourne from Ladywell Fields to the confluence of the River Thames. This improvement plan will help ensure the principles of 'making space for water' are maximised and proposed future developments (regeneration) fit into a spatial improvement plan. We propose that this Plan be owned and branded by the London Borough of Lewisham. This river corridor improvement plan shall be put together in conjunction with a professional land agent to address the land ownership issues and the London Borough of Lewisham to address proposed development sites and issues. It is envisaged that there will also be consultation with developers, river user groups and environmental pressure groups to help ensure the benefits of consultation are maximised as well as identify opportunities for collaborative working.

This Plan will tie-in with the proposed EU Interreg IVb Urban Rivers for Urban Renewal Project and will serve as the foundation for implementing (constructing) the Ravensbourne at Deptford Flood Alleviation Scheme. This flood alleviation scheme is proposed to reduce the risks of flooding to 500+ properties within Lewisham and is also the proposed match funding for the EU Interreg IVb project bid.

Chapter	Section	Page	Policy	Nature of comment
6	6.1	65	GENERAL	Commenting

Comment

We welcome the inclusion of the Environment Agency as one of the key delivery partners. By continuing to work closely together at all stages we can ensure new development addresses environmental issues and achieves environmental protection and enhancement. The AAPs offers the opportunity to produce development with the highest environmental standards. We would like to work with you on the best ways to manage and improve the green infrastructure and on achieving significantly improved water and energy efficiency.

Government Office For London

Chapter	Section	Page	Policy	Nature of comment
1	1.3	2	GENERAL	Supporting

Comment

The first section of this document sets out the context for Catford town centre in relation to the rest of the borough and South East London and the City of London (Figure 1), which is welcomed. This section also sets out the background to the Area Action Plan. However, I could not see any reference here, or in the rest of the document, to your Council's draft Core Strategy and the relationship between the two documents.

Chapter	Section	Page	Policy	Nature of comment
3	3.1	6	GENERAL	Supporting

Comment

We welcome the section detailing the spatial development strategy for Catford's town centre. This is broken down into land use and activities, creating new public spaces, transport improvements and the regeneration of key development sites. It would have been helpful to the reader if you had shown how all of these issues link together in forming the overall strategy for the area. However, you do include a useful map (Figure 3) which does show the five key regeneration areas the document focuses on and how these relate to each other.

Chapter	Section	Page	Policy	Nature of comment
1	0	2	GENERAL	Objecting

Comment

You have taken the approach within this Preferred Options document of only putting forward one preferred option in draft policy format within each policy area. With this approach you will need to show through the evidence base that there is only one realistic option for each policy remaining at this stage; details of those options being rejected and the reasoning for this; and that you have not closed off other possible options which would have benefited from further consultation. In paragraph 1.2 of the Planning Inspectorate's Local Development Frameworks: Lessons Learnt Examining Development Plan Documents it says that "LPAs should be clear that they are not presenting a "draft plan" at preferred options stage".

Chapter	Section	Page	Policy	Nature of comment
3	3.1	6	GENERAL	Objecting

Comment

5. Throughout this document you make no reference to the evidence base in your Sustainability Appraisal. This is particularly noticeable in the justification of each preferred option and in the dismissal of others. There is also little reference to the responses received following the issues and Options consultation stage - this is covered when you consider the town centre boundary only. You do list the options considered during the Issues and Options consultation stage of this document, which helps puts things into context. This is then followed by your choice of preferred options. However, as these are not always on the same page and are referred to by number only, it can be quite confusing and difficult to read across. An example of this can be seen before policies CAAP1 (Core shopping areas) - CAAP9 (Mini cab or taxi offices).

Chapter	Section	Page	Policy	Nature of comment
4	4.0	11	GENERAL	Objecting

Comment

Section 4 deals with key development issues. Within this section are a range of thematic issues and policies to address them. It would be interesting to know why you did not continue the more spatial approach set out in the four themes in section 3. These policies appear to be more like general development control policies rather than relating directly to Catford town centre, indeed some of which seem to repeat policies contained within your draft Development Control DPD, for example CAAP25 (Energy efficiency and renewables for major developments) and CAAP26 (Stand alone and roof mounted renewable energy). Furthermore, they are not generic in their nature but cover rather specific issues. Examples of which include CAAP5 (Evening economy uses), CAAP6 (Hot food takeaways), CAAP8 (Public houses), and CAAP9 (Mini cab or taxi offices). Some policies are also rather long, which can be construed as them being compounded in order to reduce the overall number of policies, for example CAAP12 (Urban design principles). Under the tests of Soundness this relates to test (vii).

Chapter	Section	Page	Policy	Nature of comment
4	4.1.1	11	GENERAL	Objecting

Comment

At the end of each section you provide a reasoned justification which considers national, regional and the Community Strategy. This is helpful as far as it goes but it often lacks detail, does not refer to other local strategies, and it is not always clear as to which ' draft policy it applies to. An example of this can be seen in the reasoned justification after policies CAAP14 (Development and accessibility) - CAAP23 (Walking and cycling).

Chapter	Section	Page	Policy	Nature of comment
5	5.0	36	GENERAL	Supporting

Comment

Your proposals for the 5 key sites you wish to take forward within this document are set out in section 5. You provide a description of each site, along with potential opportunities and constraints and key design considerations, which is helpful in setting the scene and hopefully will result in more meaningful responses from this consultation. Your aims for redeveloping each site is set out in draft policy.

Chapter	Section	Page	Policy	Nature of comment
6	6.0	64	GENERAL	Objecting

Comment

Section 6 provides details in general terms on the monitoring and implementation you are looking to put in place to aid the delivery of policies to bring forward these sites. This is useful as far as it goes but I consider that the following issues have not been adequately addressed:

-Have you secured funding to take forward the redevelopment of the five sites in both the short and long term?

-How will these proposals be phased?

-Do you have the co-operation from all of the local owner/occupiers? If not will this prevent the regeneration of a site/sites should you not be able to use compulsory purchase powers?

-You indicate that you are in negotiations with Transport for London and other transport partners regarding the realignment of the South Circular. What options do you have for taking forward the redevelopment of the Civic Quarter and South Circular site if this does not go ahead?

- To deliver the redevelopment of the site you say that you will encourage partnership working with a range of groups including, the Lewisham Strategic Partnership, public organisations and agencies, local residents/community groups/businesses. Has work on this started, how will you get all of these partners to work together and agree to your proposals and what options do you have in place should you not get buy-in from all of the interested stakeholders? Under the tests of Soundness this relates to test (viii).

Chapter	Section	Page	Policy	Nature of comment
1	0	2	GENERAL	Commenting

Comment

You have produced a Sustainability Appraisal and Strategic Environmental Assessment report for your Core Strategy. I understand that you are liaising with the Environment Agency regarding undertaking a Strategic Flood Risk Assessment. Will this be completed in time to feed into your evidence base before you proceed to submission? Under the tests of Soundness this relates to test (iii).

Greater London Authority

Chapter 3	Section 3.0	Page 6	Policy GENERAL	Nature of comment Supporting
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Comment

Support: The four main elements listed as driving the spatial development strategy for Catford are supported.

Chapter 4	Section 4.2	Page 14	Policy CAAP1	Nature of comment Supporting
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Comment
Supported.

Chapter 4	Section 4.2	Page 14	Policy CAAP2	Nature of comment Supporting
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Comment
Supported.

Chapter 4	Section 4.2	Page 14	Policy CAAP3	Nature of comment Supporting
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Comment
Supported.

Chapter 4	Section 4.2	Page 15	Policy CAAP5	Nature of comment Supporting
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Comment

Support: The principle of the policy is supported. However, the requirement for developers to make acceptable arrangements for the impact of restaurants and cafes is not reflected in section 2 on pubs and clubs. The list a - d under section 1 should be included in section 2.

In addition, it would be useful to make reference to the Mayor's Best Practice Guidance on the Night Time Economy.

Chapter 4	Section 4.2	Page 16	Policy CAAP7	Nature of comment Supporting
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Comment
Supported.

Chapter 4	Section 4.2	Page 16	Policy CAAP8	Nature of comment Supporting
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Comment
Supported.

Chapter 4	Section 4.3	Page 19	Policy CAAP10	Nature of comment Supporting
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Comment
Supported.

Chapter 4	Section 4.3	Page 19	Policy CAAP11	Nature of comment Supporting
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Comment
Supported.

Chapter	Section	Page	Policy	Nature of comment
4	4.4	21	CAAP12	Objecting

Comment

Object: Whilst the design principles established are sound and supported, there is no requirement for inclusive design principles be met. A new criteria should be added which promotes inclusive design in both build developments and public realm/open space improvements in accordance with London Plan Policy 4B.5.

Chapter	Section	Page	Policy	Nature of comment
4	4.4	21	CAAP13	Objecting

Comment

Object/omission: The requirement for public realm improvements, and new areas of public space, is supported. However, there should be positive promotion of children's play space within these areas, and specifically in new housing developments.

Chapter	Section	Page	Policy	Nature of comment
4	4.4	25	CAAP14	Supporting

Comment

Support: TfL strongly supports this policy and welcomes its inclusion into this document. TfL considers that all development proposals contained within the Area Action Plan boundary which are large enough to be referable to the Mayor should be accompanied by a comprehensive transport assessment, taking into account planned and committed developments. The transport assessment should be formulated in line with TfL's Transport Assessment Best Practice Guidance (2006). A reference to this guidance in this policy would be helpful. The borough may also wish to consider seeking transport assessments for smaller developments in addition.

Chapter	Section	Page	Policy	Nature of comment
4	4.5	25	CAAP15	Supporting

Comment

Support: TfL strongly supports this policy and welcomes its inclusion into this document.

Chapter	Section	Page	Policy	Nature of comment
4	4.5	25	CAAP16	Supporting

Comment

Support: TfL will continue to work with the borough to develop proposals to realign the A205 South Circular to the south of Lawrence House. TfL suggest that contributions should also be sought towards the re-alignment of the South Circular.

Chapter	Section	Page	Policy	Nature of comment
4	4.5	25	CAAP17	Supporting

Comment

Support: TfL strongly supports the proposed car parking standards, which conform with the London Plan. It is noted that cycle parking provision is outlined according to the borough's UDP.

Chapter	Section	Page	Policy	Nature of comment
4	4.5	25	CAAP18	Supporting

Comment

Support: TfL strongly supports this positive policy and welcomes its inclusion in this document.

Chapter	Section	Page	Policy	Nature of comment
4	4.5	25	CAAP19	Supporting

Comment

Support: TfL strongly supports this positive policy and welcomes its inclusion in this document.

Chapter	Section	Page	Policy	Nature of comment
4	4.5	26	CAAP20	Supporting

Comment

Support: TfL strongly supports this positive policy and welcomes its inclusion in this document.

Chapter	Section	Page	Policy	Nature of comment
4	4.5	26	CAAP21	Supporting

Comment

Support: TfL strongly supports this positive policy and welcomes its inclusion in this document.

Chapter	Section	Page	Policy	Nature of comment
4	4.5	26	CAAP22	Supporting

Comment

Support: TfL strongly supports this positive policy and welcomes its inclusion in this document, particularly in relation to improving links and the public realm in the area around Catford and Catford Bridge stations. For information, Network Rail have a plan to develop the Catford Station building on the east side, including a lift and a ramped bridge to the west side to achieve DDA.

Chapter	Section	Page	Policy	Nature of comment
4	4.5	26	CAAP23	Supporting

Comment

Support: TfL strongly support the positive policies and statements contained within this document, which relate to the promotion of cycling and walking, including improving connectivity and permeability, and enhancing existing links. It would further enhance the document if reference to TfL's Walking and Cycling Plans could be made.

It is further noted and supported that new at-grade pedestrian crossings will be introduced. TfL would expect these to comply with BV 165 standards. It is stated that redevelopment would need to analyse the movement of people in order to provide logical pedestrian and cycle links, which is supported. TfL would recommend that the following be utilised to assist in this which could be referred to in this document:

- A Pedestrian Environment Review System audit;
- Pedestrian and cycle counts; and
- Fruin Level of Service to ensure that pedestrian facilities are providing adequate capacity for pedestrian numbers (particularly as it is stated that pavements become crowded at peak times).

TfL would welcome further discussions on this and further information can be obtained from TfL's Best Practice Guidance on Transport Assessments.

Chapter	Section	Page	Policy	Nature of comment
4	4.6	27	CAAP24	Supporting

Comment

Support: The Council should also ensure that all developers follow the principles in the Mayor's Sustainable Design and Construction Supplementary Planning Guidance. Reference could usefully be made to this document.

Chapter	Section	Page	Policy	Nature of comment
4	4.5	27	CAAP25	Supporting

Comment

Support: The principle of this policy is supported, and the requirement for 20% carbon dioxide savings from renewables is welcomed. This exceeds current London Plan policy, and recognises the draft Further Alterations to the London Plan.

Chapter	Section	Page	Policy	Nature of comment
4	4.6	27	CAAP25	Objecting

Comment

Omission: Although the document sets high standards in energy efficiency and renewable energy on individual developments, which is in line with the Council's development policies preferred options, there is strategic concern about the lack of a specific town centre wide policy approach to energy delivery. The draft Further Alterations to the London Plan prioritises district heating at the town centre level, led by combined heat and power to serve proposed and existing development. The AAP should maximise the opportunities to link developments through a district network

Chapter	Section	Page	Policy	Nature of comment
4	4.6	27	CAAP26	Commenting

Comment

Comment: The policy should take a more positive and proactive approach to wind turbines as an important part of current renewable energy solutions. For example, the requirement to protect the visual amenity from public viewpoints is not supported – there is no definition of public viewpoints, and no indication how or why wind turbines would negatively effect visual amenity. Whilst it is acknowledged that wind turbines are not suitable in every location, policy should be supporting their inclusion apart from in very special circumstances.

Chapter	Section	Page	Policy	Nature of comment
4	4.6	27	CAAP27	Supporting

Comment
Supported.

Chapter	Section	Page	Policy	Nature of comment
4	4.6	28	CAAP28	Commenting

Comment

Comment: The principle of this policy is supported and welcomed. The policy should seek to promote the use of water meters in new development as a method of minimising mains water use. This is a Mayor's Essential Standard in the Sustainable Design and Construction SPG. The policy could usefully refer to the draft FALP 4A.11 policy, which establishes a maximum water use target of 40m³ per bedspace per year for residential development.

Chapter	Section	Page	Policy	Nature of comment
4	4.6	28	CAAP29	Commenting

Comment

The areas around the river Ravensbourne include flood zone 3. Development within these areas will require a Flood Risk Assessment in line with PPS25. It may be advisable to include proposals that will generate an increase in the flood plain to improve the ability to store flood water and thereby actively reduce flood risk in other parts of the borough.

Chapter	Section	Page	Policy	Nature of comment
4	4.6	28	CAAP30	Commenting

Comment

Comment: The emphasis on SUDs is supported although the draft Further Alterations to the London Plan introduce the sustainable drainage hierarchy policy 4A.5vii, which should be reflected in the AAP.

Chapter	Section	Page	Policy	Nature of comment
4	4.6	28	CAAP31	Supporting

Comment
Supported.

Chapter	Section	Page	Policy	Nature of comment
4	4.6	28	CAAP33	Objecting

Comment

Object: The policy needs to be expanded to be in conformity with LP 4A.14 policy on noise – in particular, requiring noise sensitive development to be separated from major sources of noise wherever practicable. "Attenuation measures" does not adequately address this. (CAAP33 compounds the problem of non-conformity in the proposed Core Strategy and Development Control Policies highlighted previously).

Chapter	Section	Page	Policy	Nature of comment
4	4.6	28	CAAP34	Commenting

Comment

Comment: The principle of the development is supported. However, the Council should proactively seek the use of energy efficient lighting. This is a Mayor's Essential Standard in the Sustainable Design and Construction SPG.

Chapter	Section	Page	Policy	Nature of comment
4	4.6	29	CAAP35	Supporting

Comment

Support: This draft policy is in Line with New Policy 5 in the London Plan and with Proposal 19 of the Mayor's Draft Business Waste Strategy.

The requirement for developers to produce site waste management plans (SWMPs) as a means of promoting sustainable construction is supported. Lewisham should however take the opportunity to establish best practice and encourage SWMP's for all development (including those valued under 1000m2, or ten dwellings). The level of detail required by the SWMP however should differ based on the size and value of the project. SWMP's should identify quantities and types of construction waste, demonstrate how off site proposal of waste will be managed, identify better segregation for recovery of construction waste that is hazardous and reduce the amount of waste sent to landfill. Lewisham should ensure that where appropriate the same sustainability principles are used to assess planning applications.

Chapter	Section	Page	Policy	Nature of comment
4	4.6	29	CAAP36	Supporting

Comment
Supported

Chapter	Section	Page	Policy	Nature of comment
4	4.6	29	CAAP37	Supporting

Comment

Support: Policy 4A.2 of the London Plan requires the provision of suitable waste and recycling storage facilities in all new developments (including residential developments). This policy could be usefully expanded with more information.

All storage areas should be demarcated and clearly signed. Waste and recycling areas should be encased and if necessary, screened from view while remaining easily accessible. Access to recycling facilities should be as easy as to waste facilities. Storage capacity should be capable of meeting and exceeding the London Plan household recycling targets of 30% recycling by 2010 and 33% by 2015. The design of new developments also needs to ensure waste storage areas are adaptable so that they are capable of meeting future higher recycling standards.

Storage requirements include storage bins in kitchens and in local shared recycling facilities at a rate of one site per 500 persons as well as facilities for kerbside collection. For blocks of flats or apartments, recycling storage facilities should be provided on each floor. Where possible designs for properties with gardens or landscaped spaces, should include storage space for composting facilities.

The location of waste storage and recycling facilities in new developments should allow consideration of vehicular access to the site for waste collection vehicles and its potential noise impact.

Chapter	Section	Page	Policy	Nature of comment
4	4.6	29	CAAP38	Supporting

Comment

Support: Policy 4A.2 of the London Plan requires the provision of suitable waste and recycling storage facilities in all new developments (including commercial and large scale developments). As above, this policy could be usefully expanded with similar information to guide future developers.

Chapter	Section	Page	Policy	Nature of comment
4	4.7	32	CAAP39	Supporting

Comment
Supported

Chapter	Section	Page	Policy	Nature of comment
4	4.7	32	CAAP40	Commenting

Comment

Comment: This policy could usefully be expanded to promote inclusive design, as well as design. In addition, developers should be encouraged to use innovative ways to include children's play space in residential developments.

Chapter	Section	Page	Policy	Nature of comment
4	4.7	32	CAAP41	Supporting

Comment
Supported.

Chapter	Section	Page	Policy	Nature of comment
4	4.7	32	CAAP42	Objecting

Comment

Object: As raised previously with the Council, the borough-wide target of 35% affordable housing is not acceptable. It is acknowledged that discussions on this issue are ongoing.

Chapter	Section	Page	Policy	Nature of comment
4	4.7	32	CAAP43	Supporting

Comment
Supported.

Chapter	Section	Page	Policy	Nature of comment
4	4.8	35	CAAP45	Supporting

Comment
Supported.

Chapter	Section	Page	Policy	Nature of comment
4	4.8	35	CAAP46	Supporting

Comment
Supported.

Chapter	Section	Page	Policy	Nature of comment
4	4.8	35	CAAP47	Commenting

Comment

Comment: The principle of the policy is supported. In accordance with London Plan Policy 6A.4 employment and training schemes should also include provision or contribution towards childcare. This will assist with removing barriers to employment for local people.

Chapter	Section	Page	Policy	Nature of comment
4	4.8	35	CAAP48	Supporting

Comment
Supported.

Chapter	Section	Page	Policy	Nature of comment
5	5.1	40	Development Opportunity Site 1	Commenting

Comment

Comment: As discussed in response to preferred policy CAAP25, large sites coming forward within the town centre should be supporting the principles of decentralised energy. This approach should seek to connect as much built development to gain the maximum efficiencies and be subject to a sperate policy, but could also be usefully included here as a specific requirement.

Chapter	Section	Page	Policy	Nature of comment
5	5.2	45	Development Opportunity Site 2	Commenting

Comment

Comment: This policy is supported in principle. As above, this could usefully include the promotion of decentralised energy. In addition, the reference to the street market should include a statement of protection, to make the importance of its continuation explicit.

Chapter	Section	Page	Policy	Nature of comment
5	5.3	49	Development Opportunity Site 3	Supporting

Comment

Support: The importance given to the connectivity of this site is supported. As above, the need for a town centre approach to energy provision should be promoted.

Chapter	Section	Page	Policy	Nature of comment
5	5.4	55	Development Opportunity Site 4	Objecting

Comment

Object: The reference to a 'focus on key worker housing' is not appropriate in policy. It is acknowledged that English Partnerships are bringing this site forward as part of their London Wide Initiative programme, however any negotiations on tenure split need to be agreed on a site-by-site basis. It is more appropriate to state that the site will 'involve residential units, maximising levels of affordable housing'.

Chapter	Section	Page	Policy	Nature of comment
5	5.4	55	Development Opportunity Site 4	Commenting

Comment

Comment: It is important to note that there is potentially an issue with construction access via the A205/Ravensbourne Park for this development. TfL is currently in discussions with the developers to resolve the concerns. Figure 11 shows as item "K" that there is potential for a second station access. Whilst this is supported by TfL in principle, this may be difficult to achieve given the levels changes and station security issues, and this aspiration would be wholly dependent on the development to fund it.

Chapter	Section	Page	Policy	Nature of comment
5	5.4	55	Development Opportunity Site 4	Supporting

Comment

Support: The promotion of the redevelopment around the restoration of the river corridor, and the reference to the importance of Ladywell Fields SINC is supported. In addition, the design principles are supported, particularly the need for development to not be dictated by the sewer, the importance of connectivity, and for open space within the development.

Chapter	Section	Page	Policy	Nature of comment
5	5.5	61	Development Opportunity Site 5	Supporting

Comment

Support: The promotion of the redevelopment around the restoration of the river corridor is supported.

Chapter	Section	Page	Policy	Nature of comment
6	6.5	66	GENERAL	Commenting

Comment

Comment: In accordance with London Plan Policy 6A.4 priority interventions should also include provision or contribution towards childcare. This will assist with removing barriers to employment for local people.

Chapter	Section	Page	Policy	Nature of comment
1	0	2	GENERAL	Supporting

Comment

Both Area Action Plans (AAPs) are supported in principle. Lewisham Town Centre AAP is a particularly successful response to the new planning systems promotion of spatial planning. The two documents are however very different in style and content, which may create an awkward family of documents when finished. The Catford Town Centre AAP is largely policy based, with detailed policies on housing and sustainability, for example, which in some respects mirrors the Development Policies and Core Strategy policies. However, Lewisham AAP takes a design led approach, and does not include the same policy detail. Both documents are largely successful, but it may be beneficial to introduce some standardisation across the pair.

Chapter	Section	Page	Policy	Nature of comment
4	4.7	32	CAAP42	Objecting

Comment

Both AAPs mirror the Development Policies approach to affordable housing, and include a 35% affordable housing target. As stated by the Mayor previously this approach is not supported and is considered not in general conformity. It is acknowledged however that discussions are ongoing between GLA officers and the Council regarding this matter, and it is hoped that a successful conclusion can be met.

Chapter	Section	Page	Policy	Nature of comment
4	4.6	27	CAAP24	Objecting

Comment

On balance, the sustainability, and particularly the energy policies, within the Development Polices document are supported. These are repeated in the Catford AAP. However neither AAP address the need to actively promote and secure district heating at the town centre level, led by combined heat and power to serve proposed and existing developments. This is a key component of the draft Further Alterations to the London Plan, as amended by documents submitted to the recent Examination in Public . The AAP documents are the appropriate method with which to establish policy support for this approach. The current documents therefore raise serious strategic concern in this regard and GLA officers would be keen to follow this up in detail with Lewisham Council.

Chapter	Section	Page	Policy	Nature of comment
4	4.4	21	CAAP13	Objecting

Comment

Neither AAPs is proactive enough in promoting inclusive design of both individual developments and in public realm improvements. When establishing urban design criteria, as both AAPs do, it is vital that the need to ensure equal access for all is included. In addition, neither AAP supports a shopmobility scheme for the town centres. This is a vital facility, which should be secured through development, for example through s.106 agreements.

Chapter	Section	Page	Policy	Nature of comment
4	4.7	32	CAAP41	Objecting

Comment

The Catford AAP explicitly requires that all residential development be built to Lifetime Homes standards, and that 10% be wheelchair accessible, or easily adaptable. Lewisham AAP does not include this requirement. It is acknowledged that the Development Policies DPD includes the requirement for Lifetime Homes and wheelchair homes, in accordance with London Plan Policy, however this differing approach may cause confusion. This issue is also raised with regard to renewable energy and sustainability. The GLA would welcome further discussion with the Council regarding this issue.

Chapter	Section	Page	Policy	Nature of comment
4	4.5	24	GENERAL	Supporting

Comment

Overall TfL considers both AAPs to be extremely positive in transport terms. Both AAPs seek to encourage more sustainable forms of transport, particularly walking and cycling. Car parking standards conform with the London Plan and the documents show that joint working exists between the borough and TfL, which is welcomed. The documents would benefit from some minor changes where references could be made to TfL's cycling and walking plans as well as TfL's Best Practice Guidance on Transport Assessments. TfL will continue to work with the borough to assist in delivering the transport improvements necessary to meet the identified development and regeneration needs. TfL expects the borough to maximise car free developments and seek Section 106 contributions to mitigate their impacts upon the public transport network.

Chapter	Section	Page	Policy	Nature of comment
4	4.3	19	CAAP10	Objecting

Comment

The LDA objects to the relaxed approach to employment land and seeks a more restrictive policy response. The requirement to deliver employment and training initiatives is supported, however this should be expanded to include methods to overcome barriers to work, for example childcare.

Chapter	Section	Page	Policy	Nature of comment
1		2	GENERAL	Supporting

Comment

The draft Development Plan Documents are largely supported.

A number of strategic issues are raised in the AAPs, particularly the borough wide affordable housing target, and the relaxed approach taken to employment land. It is acknowledged that GLA officers and the Council are in discussions regarding these issues, and it is hoped that a successful resolution can be reached. In addition, concern is raised regarding the need to secure decentralised energy at the town centre level.

Highways Agency

Chapter	Section	Page	Policy	Nature of comment
4	4.5	24	GENERAL	Commenting

Comment

1.Thank you for inviting the Highways Agency (HA) to comment on Lewisham's Local Development Framework Preferred Options Consultation.

2.The HA, on behalf of the Secretary of State for Transport, is responsible for managing and operating a safe and efficient Strategic Road Network (SRN) {i.e. the Trunk Road and Motorway network) in England as laid down in Department for Transport (DfT) Circular 02/2007 (Planning and the Strategic Road Network). I have attached a link to the new circular for your convenience.

<http://www.dft.gov.uk/consultations/aboutria/ria/revisedcircularpianningandsrn>

3.The HA do not wish to comment on the Preferred Options.

Hyde Housing Association

Chapter	Section	Page	Policy	Nature of comment
5	5.3	49	Development Opportunity Site 3	Objecting

Comment

We act on behalf of Hyde Housing Association who own 2 – 36 Plassy Road, Catford. We have reviewed the Catford Area Action Plan (AAP): Preferred Options Report and note that whilst Hyde's site falls within the area covered by the AAP it is not afforded any special designation or identified as a development opportunity site. Accordingly, our client wishes to object to the omission of the Plassy Road site from the emerging AAP. The basis of this objection is set out within the following paragraphs.

It is considered that the Plassy Road site, which is located within both the designated town centre and sustainable living area within the Adopted UDP, is a key 'gateway' site at the entrance to Catford. It currently comprises a series of terraces containing 18 Victorian houses which are not overly attractive nor create a sense of arrival or place when entering Catford town centre on the A205.

Chapter	Section	Page	Policy	Nature of comment
5	5.3	49	Development Opportunity Site 3	Objecting

Comment

Over the last 8 months Hyde and their design team have been in extensive discussions with senior officers at the Council on the proposed redevelopment of the site to provide a new high quality residential scheme of approximately 60 – 70 new residential units. In order to make best use of the site, it is proposed to provide a front block on to Plassy Road together with a row of mews houses to the rear which will assist in bridging the transition between the two storey houses to the east of the site and the higher density development within Catford town centre. Given the sustainable location of the site it is proposed that any development proposals that came forward on the site would be car free.

In view of the above, senior officers at the Council are fully aware of Hyde's intentions to redevelop the site and the general design principles and parameters agreed during the discussions held.

The issue of the potential opportunities to undertake localised road widening along the length of Plassy Road has been discussed at length with Transport for London and the emerging scheme for the site provides a 3 m strip of land along the site frontage to be retained for any potential future road widening. The retention of this strip of land has been discussed and agreed with officers in principle and will form an integral part of any scheme brought forward on site.

Chapter	Section	Page	Policy	Nature of comment
5	5.3	49	Development Opportunity Site 3	Objecting

Comment

The emerging Catford AAP allocates the site immediately to the west of the Plassy Road site as 'Development Opportunity Site 3 – Plassy Road'. A mix of uses are proposed for this development opportunity site comprising retail, residential and leisure uses. Accordingly, the proposed residential uses on the Plassy Road site would be compatible with the prospective uses on the Island site and achieve the parallel aim of intensifying development in an accessible location. The inclusion of the site in the opportunity area or the stand alone allocation of the Plassy Road site would create opportunities to bring forward the redevelopment of this key gateway location in a holistic manner.

A key design objective identified within the AAP is the prospect of utilising the Island site as a new gateway feature when approaching the town from the east. We consider that the provision of a high quality building on Plassy Road opposite the Island site would enhance this area and achieve the stated aim of improving the arrival experience from this direction.

Furthermore, the emerging development proposals for Hyde's site also include extensive landscaping to soften the street scene and lessen the impact of any buildings. Such measures have been identified within the AAP as important considerations which will enable the potential road widening scheme and soften the development edges.

A further key design objective in developing out the Island site is considered to be the potential for the improvement of the relationship of the site to the residential area to the east and the town centre to the west. The proposal on Plassy Road, and its scale in particular (indicatively shown as the provision of four storeys along Plassy Road scaling down to two storeys adjacent to the dwellings to the rear) would serve to improve the interface between both land uses.

Chapter	Section	Page	Policy	Nature of comment
5	5.3	49	Development Opportunity Site 3	Objecting

Comment

In view of the foregoing, we consider that the Plassy Road site should be identified as a stand alone development opportunity site in the Catford Area Action Plan as it would deliver the regeneration of one side of Plassy Road which is a key gateway location to Catford town centre. It will also provide a range of new housing, including family accommodation, in a sustainable location and it will allow provision to be made for any future road widening to Plassy Road in accordance with the aspirations of Transport for London. Furthermore, it will assist in providing a transition between the predominantly suburban development to the east and the higher density development to the west. It is also a wholly deliverable scheme which could be realised in the next 1 – 2 years.

An alternative option would be for Hyde's site to be identified within the wider Plassy Road Island site designation, although careful consideration would need to be given to the deliverability of this designation to ensure that Hyde's proposals are not held back.

Jeffrey, Mr Nick

Chapter	Section	Page	Policy	Nature of comment
5	5.2	45	Development Opportunity Site 2	Objecting

Comment

The proposals to re-align the South Circular behind the Town Hall are excellent and necessary but not sufficient. The A21 northbound traffic needs to be taken out of the proposed civic square area in order to allow a full vibrant pedestrian square, traversed by busses and cycles, and defined by cafes and shops and the pub on the east side of Rushey Green.

This is the one point mentioned above on which the whole Plan is unclear. In the past such a re-routing was an option, and the considerations of that option have gone missing. The commercial, environmental and design effects of continued northbound traffic through the square are not considered. Northbound traffic could be rerouted around the Plassy Road site, alongside the present southbound lanes. I think it likely that land lost from the Plassy Road site would be more than compensated for by the increased value of the remaining land, and that would be due to the higher expectations of quality of space in the new Catford Square. That is what could enhance the value of the whole Plassy Road site and further the Council's overall objectives. Lessons should be learned from past decisions to allow such low quality development on the Plassy Road site. Those decisions lowered the commercial potential and value of Catford Centre overall.

The A21 has been rerouted around new civic spaces in Lewisham and notably in Bromley with great success. Transport for London and the Mayor of London should be convinced that the aims of re-routing of the A21 and of the south circular are primarily for reasons of creating the new square as well as enhancing the flow of busses, cycles, and pedestrians. This will not solve the problems of traffic capacity along the South Circular, but that should not be the immediate criteria for investment.

The Catford Town Centre Area Action Plan, Preferred Options Report proposes to "embrace the highest standards in architecture and urban design and raise the image and profiles of the area"

When I was a member of the Mayor's Commission for a Spatial Development Strategy for a New London Plan, we recommended the creation of a hundred new squares to be made a priority. Inspired by Barcelona and other places, these were to be serving Londoners all across the city, and certainly places like Catford and Deptford were foremost in that vision.

I believe that residents of surrounding areas would rally behind the Council in really promoting a new square and a truly renewed Catford as a vibrant multi-cultural focus.

Chapter	Section	Page	Policy	Nature of comment
5	5.2	45	Development Opportunity Site 2	Commenting

Comment

The proposed South Circular 'Boulevard' could be an excellent solution to the challenging boundary situation. Priority should go to a good pedestrian crossing with islands at Bromley Road, and there should be a good crossing with lights at Canadian Avenue. A solution needs to be found for west and northbound cyclists needing to turn right off Catford road near the stations.

Chapter	Section	Page	Policy	Nature of comment
5	5.4	55	Development Opportunity Site 4	Commenting

Comment

The Greyhound Stadium site has the potential to house key workers, especially younger workers in smaller units and with minimal dependence on car ownership. It also has significant further environmental potential. Again, on the Mayor's Commission for a Spatial Development Strategy for London, we urged the Mayor to consider the BEDZED development, the pioneering high-density estate aiming for zero carbon emissions in Beddington, Sutton. The Mayor adopted a policy to have a ZED in each of the 32 boroughs, and I submit to you again that this site could host the 'CATZED'. Lewisham could in doing so return to its pioneering work with Architype in environmentally and socially sustainable architecture.

Your proposals for the area between the stations are very promising and I hope that a cycle route will be designed into that area.

Metropolitan Police Authority

Chapter	Section	Page	Policy	Nature of comment
4	4.2	14	CAAP1	Objecting

Comment

Policies CAAP1 - Core Shopping Areas and CAAP2 Non-Core Shopping Areas both restrict change of use of units from Class A1 to other uses. A key part of the MPA's estate review is to introduce police 'shops' into locations with good accessibility. The purpose of police 'shops' is to provide direct public interface facilities with the police, The Borough's town centres are ideally located to accommodate these facilities.

Therefore the MPA recommend the Council's policies allow the introduction of police 'shops' in the main shopping frontages of the town centres.

In addition, the MPA are in the process of introducing Safer Neighbourhood Teams into every ward across the Borough. These teams require office accommodation from which police officers can patrol local areas on bike or foot. Such office accommodation could be sited in local shopping centres and parades either in isolation or with police 'shops'.

The MPA request the Council's policies recognise the potential need for the introduction of these police facilities with the local shopping centres and parades.

Chapter	Section	Page	Policy	Nature of comment
4	4.2	14	CAAP2	Objecting

Comment

Policies CAAP1 - Core Shopping Areas and CAAP2 Non-Core Shopping Areas both restrict change of use of units from Class A1 to other uses. A key part of the MPA's estate review is to introduce police 'shops' into locations with good accessibility. The purpose of police 'shops' is to provide direct public interface facilities with the police, The Borough's town centres are ideally located to accommodate these facilities.

Therefore the MPA recommend the Council's policies allow the introduction of police 'shops' in the main shopping frontages of the town centres.

In addition, the MPA are in the process of introducing Safer Neighbourhood Teams into every ward across the Borough. These teams require office accommodation from which police officers can patrol local areas on bike or foot. Such office accommodation could be sited in local shopping centres and parades either in isolation or with police 'shops'.

The MPA request the Council's policies recognise the potential need for the introduction of these police facilities with the local shopping centres and parades.

Chapter	Section	Page	Policy	Nature of comment
4	4.4	21	CAAP12	Supporting

Comment

Policy CAAP12 Urban Design Principles, states that development will be required to address a number of criteria including crime prevention. It states, Secured-by-design principles are to be considered in the design of new development in order to create spaces that minimise crime and make people feel safe.

The MPA support the inclusion of this policy and recognise and welcome the fact that prior representations have been taken on board.

Chapter	Section	Page	Policy	Nature of comment
4	4.8	35	CAAP46	Objecting

Comment

Section 4.8 Community, relates to the provision of community facilities and infrastructure in Catford Town Centre. The section does not specifically refer to policing, but refers to a number of relevant policies including CAAP46. Policy CAAP46 refers to new Community Uses and states "the Council will work in partnership with appropriate community service providers to ensure the health, education and community service needs arising from a development are provided for. The use of planning obligations and conditions on planning permissions may be used in pursuit of this policy."

The provision of effective policing is of crucial importance across London to ensure safe environments are created consistent with national planning policy guidance in Planning Policy Statement 1 (PPS1). Paragraph 16 of PPS1 states that development plans should promote development that creates socially inclusive communities. It specifically states plan policies should ensure:

- a) the impact of development on the social fabric of communities is considered and taken into account;
- b) safe, healthy and attractive places to live are delivered.

At a strategic level, paragraph 3.76 of the London Plan recognises the importance of initiatives relating to policing and community safety and crime reduction in improving the quality of life of many Londoners.

Given the policy content above, it is important to recognise the role of the police within the provision of community infrastructure and this should be reflected within relevant planning policy documentation.

Suggested Alteration

Policy CAAP46 -New Community Uses, should be altered to read:-

'The Council will work in partnership with appropriate community service providers to ensure that health, education, policing and community services needs arising from a development are provided for.

'The use of planning obligations and conditions permissions may be used in pursuit of this policy'.

Chapter	Section	Page	Policy	Nature of comment
6	6.4	66	GENERAL	Commenting

Comment

The MPA are mindful that PPS1 states that Councils should prepare development plans which promote inclusive, healthy, safe and crime free communities. Also Circular 05/05 paragraph B9 advises developers may be expected to pay for or contribute to the cost of all, or that part of additional infrastructure provision, which would not have been necessary, but for their development.

The MPA are mindful that significant additional development is likely to come forward in the 5 Development Areas over the coming years, through the introduction of new uses and the intensification of employment and housing activity. The scale of development will significantly increase demands on police resources, and the MPA believe it is reasonable for planning contributions to be sought for policing needs through Section 106 agreements where these are consistent with the policy tests in Circular 05/05.

Having regard to the above the MPA request that the Property Services Department of the Metropolitan Police Authority are formally consulted when any significant planning applications are submitted to the Council within the Catford Town Centre Area Action Plan area. Consultation should be forwarded to:

Metropolitan Police Service
Director of Asset Management
Property Services
12th Floor, Empress State Building
Empress Approach
Lillie Road
London SW6 1TR

Natural England

Chapter	Section	Page	Policy	Nature of comment
1	0	2	GENERAL	Supporting

Comment

RELATES TO SUSTAINABILITY APPRAISAL

The Non - Technical Summary provides a list of the eighteen objectives for the Plan, as listed on page 2 and Natural England is broadly supportive of these objectives as listed, especially the following:

To maintain and enhance open space, biodiversity, flora and fauna.

However, given the aegis of PPS 9 Biodiversity and key principle fii) the Council should have regard to increasing biodiversity as well as

maintaining and enhancing it, for example:

"Plan policies and planning decisions should aim to maintain, and enhance, restore and add to biodiversity and geological conservation interests. In taking decisions, local planning authorities should ensure that appropriate weight is attached to designated sites of international, national and local importance; protected species; and to biodiversity and geological interests within the wider environment".

The Council should give consideration to amending this objective to include increasing Biodiversity.

Objective 7

To reduce car travel and improve accessibility by sustainable modes of transport.

Objective 8

To mitigate, and adapt to, the impact of climate change.

Figure 2 provides a list of Key Issues identified including Nature Conservation, Biodiversity, Open Space and Recreation all of which are welcomed for their inclusion, as are the bullet points identified with them:

- Protect and enhance biodiversity in Catford Town Centre
- Consider the Ravensbourne River for its Biodiversity assets
- Consider for new/improved wildlife habitats
- Adequacy and quality of Open Space provided (distribution) in and around Catford Town Centre, including Waterway link
- Protection of Open Space and Biodiversity from development and enhancement where possible.

The Appraisal Methodology proposed is acceptable and in line with those undertaken by other Borough's.

Background

Paragraph 3.2 (Page 13) provides a list of Objectives for the Catford Area Action Plan, including Objective 6 which relates to improved accessibility through improved pedestrian, cycle and public transport links and interchanges which is supported.

Objective 7 which relates to improved sustainable access to local open spaces which is also supported.

However, there appears to be no objectives relating to Biodiversity or the environment, these objectives as listed under Figure 1 - Objective 5 appear to predominately relate to economic issues, with some social and leisure objectives,

Chapter	Section	Page	Policy	Nature of comment
1	0	2	GENERAL	Commenting

Comment

RELATES TO SUSTAINABILITY APPRAISAL

Sustainability Objectives, Baseline and Context

Figure 4 - Sustainability Objectives (page 18) is similar to Figure 1 in the Non Technical Summary mentioned above, in that appears to be predominately economic. The document has otherwise identified and referenced appropriate policies, plans and programmes and the areas covered are those that Natural England would wish to see considered.

Chapter
4

Section
4.4

Page
21

Policy
CAAP12

Nature of comment
Commenting

Comment

When providing new public spaces the Council should ensure that, where practical, consideration is given to green and or open spaces not just hard landscaped areas.

Network Rail

Chapter	Section	Page	Policy	Nature of comment
5	5.4	55	Development Opportunity Site 4	Supporting

Comment

Network Rail strongly supports the enhancement of station facilities in relation to Development Site 4 and looks forward to continuing to work with the Council and the developer to achieve this goal.

Palumbo, Mrs J M

Chapter	Section	Page	Policy	Nature of comment
5	5.2	45	Development Opportunity Site 2	Objecting

Comment

Although the building is not shown on the maps, I live in the retirement apartment block on Sangley Road which overlooks the A205- The noise and dirt from the traffic means that residents cannot open doors and windows unless they are subjected to this overpowering nuisance. On hot summer days last year and similar conditions in April this year, it meant that the heat was intolerable unless a window/door was opened and then the noise and pollution was insufferable.

Opposite this block exists an ample green area where the A205 could be realigned to the north, along the stretch from the junction of Plassy and Sangley Roads to the A21 (Figure 2 page 7). This would allow for a wider tree-lined 'boulevard style' pavement on the south side of Sangley Road where most people walk and enable the A205 to be directly in line with the proposed realignment south of Laurence House.

It is a fact the current A205 traffic is often caught on the hatched road area when trying to cross the A21 that causes congestion affecting both the Catford gyratory system and the A21 from Bromley. A direct crossing of these roads should eliminate this.

Chapter	Section	Page	Policy	Nature of comment
5	5.1	41	Development Opportunity Site 1	Objecting

Comment

re: Figure 6 page 41. I am dismayed at the 'pedestrian priority' between the Civic Centre and Laurence house (north side) and consider this a missed opportunity for bus only lanes. Buses could be segregated from through traffic on the A205 making it much safer for all pedestrians to travel and shop. We are already being encouraged to use public transport and discouraged from using cars.

The bus waiting area 'K' in Rushey Green (northwards to Lewisham) is sited on a busy corner with Catford .Broadway. The frontage comprises a bank with two ATM's, Building Society also with ATM and shops to Winslade Way. There is a bus stop for routes 75 and 185- This pavement is always busy during daytime and I believe it would be a danger to pedestrians and traffic alike if more buses were scheduled to stop at this venue. At least 6 other bus routes currently stop outside the Theatre where there is more room.

Chapter	Section	Page	Policy	Nature of comment
5	5.2	45	Development Opportunity Site 2	Objecting

Comment

Lorry Park. X cannot find any provision in the Area Action Plan for an alternative site for the parking of lorries if the A205 is realigned.

When I spoke to drivers of the many lorries parked they were unaware of any threat to their parking site and were also surprised that they or their employers had not been consulted. They told me that the Catford lorry park is the only one now left for them to stay overnight after leaving the M25.

Many delivered to the wider SE London area and this site was a haven in order to comply with transport regulations. The loss of this site would be a bitter blow and it seems their needs have been ignored.

The lorry drivers do not at the moment pay for parking although they used to and would be prepared to pay again. When they can be accommodated this would be a source of income for the Council.

Chapter	Section	Page	Policy	Nature of comment
5	5.0	36	GENERAL	Commenting

Comment

The overall plan lists additional retail outlets on all 5 development sites. I am hoping that this will not mean that Catford will become a 'uniformity town' - where one finds the same shops on every High Street. The possible expansion of a supermarket also fills me with dread!

St Dunstans College Educational Foundation

Chapter	Section	Page	Policy	Nature of comment
4	4.5	25	CAAP16	Supporting

Comment

5. Many of the pupils and staff travel to the School by public transport but more could be encouraged to do so if the accessibility by public transport, including rail and bus services, was improved to provide easy, safe and attractive routes to the School for staff and pupils, particularly from the two nearby railway stations, Catford and Catford Bridge. The implementation of the Catford Town Centre Area Action Plan could promote the necessary upgrading which the School would welcome. The College, therefore, welcomes and supports the Council's approach.

Whilst generally supportive of the proposals set out in the document the School would like to see some specific reference to the importance of the College site to the proposals set out in the Area Action Plan and particularly in respect of providing additional justification for the implementation of the proposed environmental improvements around the School and between the School and the railway stations.

Chapter	Section	Page	Policy	Nature of comment
4	4.5	26	CAAP22	Supporting

Comment

It follows that in Section 4.5 Transport, options 1A, 1B, 3A and 3B are strongly supported. Additionally, draft policies CAAP22 (Improvement to Transport Interchanges) and CAAP23 (Promotion of Walking and Cycling) should be pursued. Such objectives are certainly in the interests of promoting the accessibility of the School by non car-based modes.

Chapter	Section	Page	Policy	Nature of comment
4	4.5	26	CAAP23	Supporting

Comment

It follows that in Section 4.5 Transport, options 1A, 1B, 3A and 3B are strongly supported. Additionally, draft policies CAAP22 (Improvement to Transport Interchanges) and CAAP23 (Promotion of Walking and Cycling) should be pursued. Such objectives are certainly in the interests of promoting the accessibility of the School by non car-based modes.

Chapter	Section	Page	Policy	Nature of comment
5	5.4	55	Development Opportunity Site 4	Supporting

Comment

The School also wishes to generally support the proposals relating to Development Opportunity Sites no.4 (the Greyhound Stadium area) and no.5 (the Wickes site). In respect of the former, the School supports the preferred option of making the redevelopment of the Stadium area based primarily on residential provision. The content of paragraphs 5.4.5, 5.4.7 and the associated draft policy proposed are therefore supported.

Chapter	Section	Page	Policy	Nature of comment
5	5.5	61	Development Opportunity Site 5	Supporting

Comment

The School also wishes to generally support the proposals relating to Development Opportunity Sites no.4 (the Greyhound Stadium area) and no.5 (the Wickes site). In respect of the former, the School supports the preferred option of making the redevelopment of the Stadium area based primarily on residential provision. The content of paragraphs 5.4.5, 5.4.7 and the associated draft policy proposed are therefore supported.

In relation to the Wickes site, the School supports the preferred options listed in paragraph 5.5.5 and the draft policy set out in 5.5.7. The School is in considerable need of additional space to expand its built facilities and in particular to find a site for a new junior school in close proximity to the main site. The Council should, therefore, consider adding to the draft policy an allocation for part of the site to be used for educational purposes. Otherwise the School would support the use of the site for mixed use development particularly including a sizeable residential element,

Chapter	Section	Page	Policy	Nature of comment
6	6.1	65	GENERAL	Supporting

Comment

The School supports the implementation framework strategy set out in Section 6 in order to bring about the necessary investment in the area and the desired environmental improvements as quickly as possible. The School would welcome the opportunity to be a working partner for the purposes of implementation and to be included in the list in Section 6.1. The School is confident that given the opportunity to do so it can contribute effectively to the provision of enhanced community infrastructure in this part of Catford.

Chapter	Section	Page	Policy	Nature of comment
0	A3.3	76	GENERAL	Supporting

Comment

The School supports the analysis set out in paragraph A3.3 in relation to the poor quality of the existing public transport facilities.

Chapter	Section	Page	Policy	Nature of comment
0	A3.5	78	GENERAL	Commenting

Comment

Again the School should be recognised in the list set out in paragraph A3.5 as being a civic, cultural and leisure facility serving this part of the town centre.

St Modwen Developments Limited

Chapter	Section	Page	Policy	Nature of comment
5	5.1	40	Development Opportunity Site 1	Supporting

Comment

We welcome the inclusion of Catford Shopping Centre and Milford Towers as Development site 1:

“a strengthened core retail area, anchored by a supermarket, creating an opportunity to provide improved shopping and leisure facilities; residential and office uses; new public space; improved pedestrian connections to Rushey Green and Catford Broadway; and improved environment to the surrounding residential areas”.

Whilst we agree that new street frontages to Holbeach Road could be introduced to enhance the existing residential environment, we are concerned that a similar policy could be applied to Thomas Lane. Any proposal to prescribe active frontages to Thomas Lane would impose a major development constraint. The feasibility of removing service vehicles from the existing first floor deck, and redeveloping the multi storey car park, would be severely hampered.

Chapter	Section	Page	Policy	Nature of comment
5	5.1	38	Development Opportunity Site 1	Supporting

Comment

We welcome the reference to discussions undertaken to date with St Modwen and the need to focus on the expansion options for Tesco. The opportunities identified are supported, but the provision of additional uses whether office or commercial development need to be supported by market demand. On this basis we support the reference at Appendix A3.7 paragraph 2 that there is not necessarily a general market demand for new office accommodation unless a specific large occupier demand is identified.

It will be important to work with the existing retail/commercial tenants to ensure that their needs are met and that proposals seek to maintain a continuation of retail trade throughout the phases of redevelopment. This will ensure that Catford Town Centre maintains vitality and viability during this process.

It is important to retain Tesco as a significant anchor store for the centre and in doing so support their expansion needs.

Chapter	Section	Page	Policy	Nature of comment
5	5.1	38	Development Opportunity Site 1	Supporting

Comment

We welcome the intention to proceed with redevelopment of available sites pending the relocation of the South Circular Road. The complexity of this project which may take a considerable time to resolve does not need to delay redevelopment of the shopping centre, which is not dependant on these wider improvements.

Chapter	Section	Page	Policy	Nature of comment
5	5.1	38	Development Opportunity Site 1	Objecting

Comment

At paragraph 5.1.3 regarding the constraints for redevelopment, the mention of water capacity should be further expanded. The need to bring Milford Towers up to 2010 decent home standards through refurbishment or complete redevelopment is an opportunity and should not be listed here as a constraint.

Chapter	Section	Page	Policy	Nature of comment
5	5.1	40	Development Opportunity Site 1	Supporting

Comment

At draft policy 5.1.6 we acknowledge the need for a comprehensive master plan for the redevelopment of Catford Shopping Centre and Milford Tower Site. While that masterplan should be considered in the context of the other town centre development sites, delays in the promotion of these schemes should not hold back progress elsewhere. We welcome the creation of improved access through improved links to Rushey Green, Holbeach Road and Catford Broadway.

Chapter	Section	Page	Policy	Nature of comment
5	5.1	40	Development Opportunity Site 1	Supporting

Comment

We support point e) that supports the inclusion of a redeveloped supermarket; however we do not believe that basement car parking should be prescribed at this stage. An appropriate level of car parking will be provided within the new scheme. The exact format in which car parking is provided will need to be determined taking into account a number of factors including the particular requirements of proposed retail, leisure and office occupiers. The cost of constructing the new parking facilities will be a significant factor, and we believe that prescribing underground parking at this stage could in the future render an otherwise viable scheme unfeasible.

Chapter	Section	Page	Policy	Nature of comment
5	5.1	40	Development Opportunity Site 1	Objecting

Comment

1.9 At point h) there is major concern that animated frontages are sought to the rear of the scheme fronting Thomas Lane and Holbeach Road. Rear servicing and storage areas need to be accommodated within the scheme and the destination is well served by the other access points. Thomas Lane in particular does not need this treatment as it is akin to a service road with only the rear gardens of Nelgarde Road fronting the site. Thomas Lane offers the best alternative as a route for service vehicles and the car park traffic. Requiring active frontage along Thomas Lane will severely constrain the development options, additionally, the illustrated plan shows an access route to Thomas Lane which is not required in order to achieve any of the schemes objectives. Pedestrians approaching the centre from Catford Road will be highly unlikely to divert up Thomas Lane rather than entering the centre from the Catford Broadway, whilst pedestrians approaching from Holbeach Road will be almost certain to use the new Holbeach Road entrance. A pedestrian route from the centre of the scheme to Thomas lane would draw insufficient footfall to attract retailers or to ensure a sense of security for those choosing to use it.

Chapter	Section	Page	Policy	Nature of comment
5	5.5	59	Development Opportunity Site 5	Objecting

Comment

The introduction of small convenience retail uses in the development areas around the station should be suitably limited in size to ensure that the centre doesn't become further elongated to the detriment of its core. The redevelopment of the Wickes site should likewise not expand the range of retail types traded and remain a bulky goods destination to augment the town centre.

Chapter	Section	Page	Policy	Nature of comment
3	3.5	9	GENERAL	Objecting

Comment

At paragraph 3.5 we note the proposed redevelopment of Plassey Road site seeks improved shopping facilities. This redevelopment should not be brought forward prior to the Catford Shopping Centre proposals as this would dilute tenant demand and thereby affect the viability of the core shopping area redevelopment.

Chapter	Section	Page	Policy	Nature of comment
4	4.1	11	GENERAL	Objecting

Comment

At paragraph 4.1 the additions to the town centre boundary do not seem necessary and could in fact undermine its coherence. The addition of development sites 2, 3 and 4 act as stand alone dense mixed use urban development sites and are not core to the retail, civic and service function of the town centre. It is right that they should be included in the Catford Town Centre AAP but not the definition of the town centre which has key PPS6 implications. These areas are separate from the existing Town Centre and do not help the expansion of its retail and service offer in a logical manner.

Chapter	Section	Page	Policy	Nature of comment
4	4.2	14	CAAP4	Objecting

Comment

4.1 At policy CAAP4 the loss of larger retail units of over 250 sq m should also be considered in the context of wider benefits offered by a scheme. This is particularly so in respect of the comprehensive redevelopment of Catford Shopping Centre. At Policy CAAP8 regarding loss of public houses, the reference to community uses at point b) should only apply when a function room or similar facility is included within the public house and not when it operates akin to a standard retail unit.

Chapter	Section	Page	Policy	Nature of comment
4	4.3	19	CAAP10	Commenting

Comment

Policy CAAP10 regarding Employment Space states at point B) that [the council will seek] for large scale developments to provide suitable employment space as part of any mixed-use proposal. This provides a general approach and it is important that it incorporates the full employment benefits of a development, such as those in retail and services and that any specific B class space is supported by market data.

Chapter	Section	Page	Policy	Nature of comment
4	4.4	21	CAAP12	Objecting

Comment

At policy CAAP12 'Urban Design Principles' the support for mixed use is welcomed with residential above ground floor retail. In terms of redevelopment and footprint it is not appropriate that historic street patterns are re-imposed on the Catford Shopping Centre as this could unduly affect the viability of its rejuvenation. While it is likely that the current single structure will be replaced by a more organic pattern it is important that it is not broken up to such an extent that the chance to optimise other benefits and maximise development is lost. This is especially relevant in light of the need to attract anchor retailers requiring larger store footprints to the centre, both to ensure higher visitor numbers generally and to draw greater footfall to those parts of the site located furthest from the prime frontages of Rushey Green and Catford Broadway.

Chapter	Section	Page	Policy	Nature of comment
5	5.2	45	Development Opportunity Site 2	Supporting

Comment

We welcome the proposal to relocate the South Circular to create a better pedestrian and town centre user environment, but this should not hold up other development schemes proceeding.

Chapter	Section	Page	Policy	Nature of comment
4	4.5	25	CAAP16	Objecting

Comment

In terms of policy CAAP16 & CAAP22 and transport infrastructure the existing size and capacity of Catford Shopping Centre and Milford Towers should be considered when contributions for improvements such as Catford stations are considered which should be centrally funded by the rail operators and only in some cases by development that increase on existing development levels. Likewise at policy CAAP16 contribution towards centrally planned improvements such as TfL's new South Circular road should be assessed in the context of the overall viability and development cost of a proposal. The impact that onerous contribution could have on other benefits such as affordable housing levels should be considered.

Chapter	Section	Page	Policy	Nature of comment
4	4.5	26	CAAP22	Objecting

Comment

In terms of policy CAAP16 & CAAP22 and transport infrastructure the existing size and capacity of Catford Shopping Centre and Milford Towers should be considered when contributions for improvements such as Catford stations are considered which should be centrally funded by the rail operators and only in some cases by development that increase on existing development levels. Likewise at policy CAAP16 contribution towards centrally planned improvements such as TfL's new South Circular road should be assessed in the context of the overall viability and development cost of a proposal. The impact that onerous contribution could have on other benefits such as affordable housing levels should be considered.

Chapter	Section	Page	Policy	Nature of comment
4	5	25	CAAP19	Supporting

Comment

At policy CAAP19 and Appendix 4 the parking is in line with the London Plan parking standards. The flexibility implicit in London Plan policy 3C.23 (Parking in Town Centres), needs to be re-affirmed, as higher levels of parking may be necessary to assist the town centre regeneration and retain and attract the anchor tenants needed.

Chapter	Section	Page	Policy	Nature of comment
4	4.6	27	CAAP25	Objecting

Comment

Policy CAAP25 requires that on site renewable equipment is incorporated to reduce predicted CO2 emissions by at least 20%. This policy is too prescriptive for an Area Action Plan and a broader approach to reducing the carbon impact of the development should be taken. The reduction of CO2 emissions from the building need not be through on site generation at the level proposed as this may not be the most efficient means to achieve carbon savings which is the objective. This policy fails to take into account the energy reduction which can be achieved through design and that other locations may generate renewable energy more efficiently. Draft Planning Policy Statement 1 Planning & Climate Change supports a 10% on site renewable requirement until the feasibility of alternatives is tested through the LDF process. The wider planning policy framework including the London Plan does not currently support a higher target figure. Considerable debate on the merits of Merton Rule policies are expected in the near future.

Chapter	Section	Page	Policy	Nature of comment
4	4.6	28	CAAP29	Commenting

Comment

Catford Shopping Centre falls partly within a defined flood risk area and under the terms of Policy CAAP29, in tandem with the Environment Agency, flood risk assessment and mitigation measures will be required. This however should not put inequitable burden on the redevelopment of a sequentially preferable site which has an existing dense form of development, in order to fund flood prevention measure that should be funded from wider sources

Chapter	Section	Page	Policy	Nature of comment
4	4.6	28	CAAP30	Objecting

Comment

Policy CAAP30 is overly onerous in seeking that less water run off should result post redevelopment of a site. While reduction may result from more sustainable construction methods and the use of green roofs, a development may change the run off patterns in such a way that reduction is not possible.

Chapter	Section	Page	Policy	Nature of comment
4	4.7	32	CAAP39	Commenting

Comment

We support the need to introduce a range of tenures in housing development, the support for taller buildings and increasing residential provision when sites are redeveloped. At Policy CAAP39 further consideration should be given to whether larger family units are appropriate in the densest mixed use town centre developments. We would suggest that they are not when amenity and general space is limited and there are high levels of communal activity at ground floor from the evening economy and the servicing of businesses.

Chapter	Section	Page	Policy	Nature of comment
4	4.7	32	CAAP43	Objecting

Comment

Policy CAAP43 regarding tenure mix should not be contrary to draft Policy H5 of the Development Policies LDF document that seeks to achieve balanced and mixed communities in areas with an existing high concentration of social rented, through the introduction of flexible tenures and shared ownership.

Chapter	Section	Page	Policy	Nature of comment
4	4.8	35	CAAP45	Objecting

Comment

Policy CAAP45 regarding the need to retain community uses/services where there is a demand, should not extend to properties where this use has ceased and the property is vacant.

Chapter	Section	Page	Policy	Nature of comment
6	6.4	66	GENERAL	Objecting

Comment

Section 6.4 regards the use of Compulsory Purchase Powers. We do not believe that CPO powers will be necessary in terms of the Catford Shopping Centre and Milford Towers and this is not the appropriate way to proceed. It would only be appropriate if issues with other owners could not be resolved and this threatened a comprehensive development.

Chapter	Section	Page	Policy	Nature of comment
6	6.5	66	GENERAL	Objecting

Comment

Section 6.5 regards developer contributions via section 106. S106 contributions should be ring-fenced for Catford AAP related improvements and those that relate to a specific development, not added to a single pool.

Chapter	Section	Page	Policy	Nature of comment
2	2.2	4	GENERAL	Commenting

Comment

St Modwen are keen to see a redevelopment of this site brought forward, and will be prepared to work in close cooperation or in partnership with London Borough of Lewisham in their capacity as another major stakeholder in the scheme. St Modwen share the Councils vision for a new town centre which provides an enhanced public domain, improved scheme 'edges', better permeability, and user friendly car parking in addition to a significantly enhanced mix of retail, leisure and other uses. However, it is critical that the AAP is not over-prescriptive in its design criteria, particularly in relationship the format in which of new car parking facilities are provided. It is essential that the AAP does not impede development either by restricting the developer from responding to occupier demand or by increasing development costs to a level that investment can not be justified.

Chapter	Section	Page	Policy	Nature of comment
5	5.1	40	Development Opportunity Site 1	Commenting

Comment

A key element of the scheme will be the redevelopment of Milford Towers and their replacement with a new residential scheme. It is vital that this provides a more sustainable mix of private, affordable, part-ownership and social-rented accommodation. An early decision on the future of the Milford Towers will assist in bringing forward a redevelopment of the overall scheme.

Chapter	Section	Page	Policy	Nature of comment
5	5.2	45	Development Opportunity Site 2	Commenting

Comment

It is recognised that the proposed diversion of the A205 South Circular Road will bring benefits to the town centre, and that the redevelopment of the Town Hall and Lawrence House site will offer significant opportunities which could be successfully linked with the shopping centre scheme. It is, however, essential that these wider aspirations do not delay the long awaited redevelopment of the shopping centre which can proceed independently but in a manner complimentary to the development proposed for the neighbouring sites.

Tesco Stores Ltd

Chapter	Section	Page	Policy	Nature of comment
3	3.5	9	GENERAL	Commenting

Comment

In recent years Catford Town Centre has faced increased competition from rival retail destinations throughout London. If Catford is to continue to fulfil its role in the retail hierarchy and successfully serve its catchment it is important that the Council help facilitate enhancements to the centre's retail offer.

Tesco have long had aspirations to improve their offer within Catford and have previously met with the Council to discuss different opportunities for achieving this. More recently Tesco have been co-ordinating with St Modwens, the owners of the centre, to review the potential to enhance their existing store as part of wider improvements to the Catford Centre.

In this context we welcome the Council's aim to stimulate development interest in order to improve and regenerate Catford Town Centre. We also welcome the Council's recognition of the importance of the Catford Centre and the importance of its redevelopment to the perception of Catford. Central to this will be the retail offer introduced through future redevelopment of the centre. An enhanced Tesco store will act as a key anchor for Catford, increasing footfall through the centre, vital to the future viability of the vision set out in the Area Action Plan. It is important that the Council do not prejudice the future of the centre by setting parameters for its redevelopment ahead of detailed design work and viability testing.

We acknowledge the importance of relocating the South Circular to the wider environmental enhancements proposed for the town centre. However, given the complexities of this project it is important that it is not fundamental to the Area Action Plan so as to avoid any unnecessary delays to other projects proposed.

Chapter	Section	Page	Policy	Nature of comment
5	5.1	38	Development Opportunity Site 1	Supporting

Comment

We support designation of the Catford Shopping Centre and Milford Towers as a 'critically important' development opportunity within Catford Town Centre. We also agree that the site offers a prime opportunity to create a more appealing shopping environment and as such is central to the regeneration of the town centre. In order to allow all development options for the site to be fully considered it is important the policy

Chapter	Section	Page	Policy	Nature of comment
5	5.1	40	Development Opportunity Site 1	Commenting

Comment

Tesco welcome inclusion within Policy 5.1.6 of the need to include a redeveloped supermarket within any redevelopment of the Catford Centre. However, ahead of detailed design work and viability testing we consider the parameters to development unnecessarily prescriptive. Tesco's preference is for ground floor retailing. However, basement parking is generally highly expensive, to the extent that it often prejudices the viability of development projects. Equally, it is Tesco's experience that customers prefer ground floor parking with open ventilation where possible. This will be an important consideration when seeking to enhance Catford's appeal relative to competing retail destinations. On this basis policy should simply acknowledge a need for complimentary parking allowing the Council to assess any future scheme on its merits once the developers are confident the proposals are deliverable.

Chapter	Section	Page	Policy	Nature of comment
5	5.1	40	Development Opportunity Site 1	Commenting

Comment

Having regard to the block plan of how the site might be redeveloped, included at page 41, the Council should make clear that this is indicative so as not to prejudice future design evolution. We agree with the underlying principles and support the need to create animated shop frontages and strong pedestrian flows through the site. However, we are unsure of both the need for any significant entrance from the development to the north and for active frontages along Holbeach Road, to the north and Thomas Lane, to the east.

It is important that any development is fully integrated with surrounding uses and that any development is sensitive to the visual amenity of the surrounding residential areas. Equally the development needs to design in natural surveillance and encourage strong pedestrian movements. However, this needs to be balanced against the need to safeguard the character of the residential areas and the commercial requirements of operators in the Catford Centre. The term 'active frontages' suggests the need for shop frontages which commercially are very difficult to provide off the prime thoroughfares. Equally, whilst it will need to be handled carefully there will be a need to service a new supermarket along one of these frontages. In this instance we suggest that policy highlight the need to treat the surrounding residential amenity sensitively allowing flexibility for the development team to review development options which can then be assessed on their merits.

Thames Water Property Services

Chapter
4

Section
4.6

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28

Policy
CAAP28

Nature of comment
Objecting

Comment

Further to previous representations we are pleased to see that the draft AAP does make specific reference to Water Resources in Policy CAAP28. However, it is considered that this policy requires further clarification and that reference also needs to be made to sewerage infrastructure.

Paragraphs B3 to B8 of PPS12 place specific emphasis on the need to take account of infrastructure such as water supply and sewerage in preparing Local Development Documents. Paragraph B3 in particular states: "The provision of infrastructure is important in all major new developments. The capacity of existing infrastructure and the need for additional facilities should be taken into account in the preparation of all local development documents. Infrastructure here includes water supply and sewers, waste facilities...."

It is essential that the AAP makes reference to both the provision of adequate water and sewerage infrastructure to service development to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems.

It is also essential that the AAP makes adequate reference to water and sewerage infrastructure capacity to meet the test of "soundness" as set out in PPS 12. In December 2005 The Planning Inspectorate published "Development Plans Examination – A Guide to the Process of Assessing the Soundness of Development Plan Documents". The Guide sets out a series of 'key questions and evidence requirements' at section 1.4 which aim to provide a framework for the assessment of soundness of DPDs.

The most relevant key question under Conformity Test iv (a) is:

"Key Question - Has adequate account been taken of the relationship between the proposals in the DPD and other requirements, such as those of utility companies and agencies providing services in the area including their future plans or strategy and any requirements for land and premises, which should be prepared in parallel?" A key source of evidence which is identified in answering this question is: "Evidence - Of particular significance, will be representations from bodies that consider that the DPD either does or does not have sufficient regard to other relevant strategies for which they are responsible".

There are also a couple of relevant key sources of evidence identified in answering Coherence Test number (vii).

The sources of evidence are:

"If the DPD is a Core Strategy, the following documents, amongst other evidence, may be relevant:

.....infrastructure providers' investment programmes and strategies; environmental programmes etc."

"If the DPD is an Area Action Plan, evidence may includeassessments of infrastructure."

Therefore, if the AAP is to meet the "soundness" test, then it should include the following policies and sub-text:

"PROPOSED POLICY - WATER AND SEWERAGE INFRASTRUCTURE CAPACITY:

Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where:

1. sufficient capacity already exists or
2. extra capacity can be provided in time to serve the development which will ensure that the environment and the amenities of local residents are not adversely affected.

When there is a capacity problem and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the developer funds appropriate improvements which will be completed prior to occupation of the development."

Text along the following lines should be added to the Core Strategy to support the above proposed Policy :

"PROPOSED SUPPORTING TEXT - The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is a capacity problem and no improvements are programmed by Thames Water, the Council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development."

It is considered that the above policy/text accords with the guidance referred to above in PPS12 and the following:

Policy 4A.13 of The London Plan, February 2004, relates specifically to water and sewerage infrastructure and states: "The Mayor expects developers and LPAs to work together with water supply and sewerage companies to enable the inspection, repair and replacement of water supply and sewerage infrastructure, if required, during the

construction of development. The Mayor will work with Thames Water, the Environment Agency and other relevant organisations to ensure that London's drainage and sewerage infrastructure is sustainable."

Policy 4A.11 of the London Plan relates to water supplies and states: ".....In determining planning applications, the Mayor will and boroughs should have proper regard to the impact of these proposals on water demand and existing capacity."

Chapter	Section	Page	Policy	Nature of comment
4	4.6	28	CAAP30	Objecting

Comment

With regard to surface water drainage, it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding and this should be clearly stated in the AAP.

Thames Water recognises the environmental and economic benefits of surface water source control, and encourages its appropriate application, where it is to the overall benefit of our customers. However, it should be clearly recognised in the AAP that SUDS are not appropriate in all circumstances e.g. soakaways will not be appropriate in non free draining areas.

In the disposal of surface water, Thames Water will,

- a) Seek to ensure that new connections to the public sewerage system do not pose an unacceptable threat of surcharge, flooding or pollution;
- b) Check the proposals are in line with Government advice which encourages, wherever practicable, disposal 'on site' without recourse to the public sewerage system; for example in the form of soakaways or infiltration areas on free draining soils; and
- c) Require the separation of foul and surface water sewerage on all new developments.

Chapter	Section	Page	Policy	Nature of comment
4	4.4	20	GENERAL	Commenting

Comment

Tree Strategy and Planting –

Thames Water recognises the environmental benefits of trees and encourages the planting of them. However, the indiscriminate planting of trees and shrubs can cause serious damage to the public sewerage system and water supply infrastructure. In order for the public sewers and water supply network to operate satisfactorily, trees, and shrubs should not be planted over the route of the sewers or water pipes.

Chapter	Section	Page	Policy	Nature of comment
4	4.5	24	GENERAL	Commenting

Comment

Access –

Thames Water will require 24 hour vehicular access to any pedestrianised area to undertake emergency works. Access to the sewerage and water supply infrastructure must not be impeded by street furniture. This will enable Thames Water to operate the network with as little interruption to the service as is possible.

Chapter	Section	Page	Policy	Nature of comment
4	4.6	27	GENERAL	Commenting

Comment

Catering Establishments -

Thames Water would like Grease Traps to be installed in all catering establishments. These Traps must be regularly cleaned and maintained. Failure to enforce the effective use of grease traps will result in the build up of food deposits in sewers and drains. This can cause blockages and flooding resulting in emergency cleaning. These food deposits may also encourage the migration of rodents into the sewerage system and encourage their proliferation.

The Theatres Trust

Chapter	Section	Page	Policy	Nature of comment
5	5.2.7	45	Development Opportunity Site 2	Supporting

Comment

We welcome the proposed new setting for the Broadway Theatre which will provide solid support for an improved evening economy. Theatres are important anchors in the cultural and creative industries, providing jobs, skills, learning and educational opportunities, and vital secondary spend to tourism, retail and leisure sectors. They make a major contribution to the vitality of town centres and are significant elements of any district's cultural infrastructure. Audiences coming to an event will enliven the surrounding area in the evening and provide regular custom for local bars and restaurants outside normal working and shopping hours.

Our only concern is that there are adequate parking facilities. The economics of evening entertainment venues are reliant upon audiences being able to get to the venue by public transport or car, being able to park their cars and bikes, and being able to get home safely. Controlled Parking Zones in central locations can have serious implications on the economic viability of such venues. We would strongly urge any planning policies concerned with parking provision to consider the presence of such evening leisure facilities in the locality. These attract families, young people, disabled patrons, and older people who can be discouraged to attend if the costs of travelling and parking make the price tag of the evening out too high. By arrangement, and if available, supermarket car parks are a useful source of additional evening parking in town centres.

We look forward to being consulted on future documents when they become available, especially Development Control Policies and Planning Obligations.

Wickes

Chapter	Section	Page	Policy	Nature of comment
5	5.5	61	Development Opportunity Site 5	Commenting

Comment

My client, Wickes, have simply not had the time to review the AAP in order to pass comment on the document's aspirations. Please could you keep my details on your records and provide me with any updates, or later iterations of the AAP as they emerge.

Thank you