

GREATER LONDON AUTHORITY

Brian Regan
Planning Service
London Borough of Lewisham
3rd Floor Laurence House
1 Catford Road
London
SE6 4RU

Our ref: D&P/LDF23/
LDD05/HS01
Date: 9 October 2013

Dear Mr Regan,

Lewisham Council Local Development Framework: Proposed submission of Catford Town Centre Local Plan

Statement of general conformity with the London Plan (Planning and Compulsory Act 2004, Section 24 (4) a)

Thank you for consulting me on the above document and requesting an opinion on general conformity. As you will be aware, all development plan documents must be in general conformity with the London Plan under section 24 (1) (b) of the Planning and Compulsory Purchase Act 2004. This report constitutes my formal representations to the proposed submission consultation. Please note that this includes representations relating to general conformity with the London Plan as well as other representations to clarify or improve policy.

On 28 March 2013 my officers provided initial comments, reference LDF23LDD05/LB/01 on the draft document. The Council has responded to a number of matters raised as part of that process. However, it is my opinion that the proposed submission document is not in general conformity with my London Plan in respect of affordable housing.

I set out below my reasons and also other representations to clarify or improved other policy areas subject to this review.

- **Affordable housing**

Affordable rent has not been included as a form of affordable housing in the justification text of CLP Policy 9 - Providing new homes. A reference to affordable rented housing as well as social rented should be added to the justification text to make sure that all delivery options are considered to ensure that affordable housing provision is maximised. Catford Local Plan should provide an opportunity for the Council to update its policies to be in line with the NPPF and the Revised Early Minor Alterations (REMA) to the London Plan.



- Office

Catford is not identified in Annex 2 of the London Plan as being a viable location for either speculative or mixed use office development. The Council office presence in the centre is supported but CLP Policy 11 refers to more general office development and the borough is advised to support this with local quantified evidence of demand. The policy should also include reference to management of surplus office capacity to other uses in line with London Plan Policy 4.2B.

- Transport


Transport for London has an interest in the document because the A21 and the A205 South Circular Road form part of the Transport for London Road Network. Please find attached TfL's detailed comments on the Catford local plan.

- Tall buildings

As suggested in the previous report, it would be helpful if Lewisham Council could include indicative height ranges for the areas identified as appropriate for tall buildings in the Catford Centre and Laurence House areas. The redevelopment of the Catford Town Centre is strongly supported and GLA officers would welcome a discussion to explore the possibility for an Opportunity Area Planning Framework (OAPF) in the area.

If you would like to discuss any of my representations in more detail prior to your Examination in Public, please contact Lucy Bird (020 7983 5826) who will be happy to discuss and arrange further meetings.

Yours sincerely,



Boris Johnson
Mayor of London

cc Len Duvall, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning and Housing Committee
Eric Pickles, Secretary of State
National Planning Casework Unit, DCLG
Alex Williams, TfL



To: Lucy Bird – GLA
From: Sean Peacock – TfL Borough Planning
Phone: 0203 054 7038
Date: 4 October 2013

Catford Town Centre Local Plan Proposed Submission Document – TfL comments

TfL has been consulted on the proposed submission document of the Catford Town Centre Local Plan and has the following comments to make.

TfL has an interest in the proposals as strategic transport authority and because the A21 (Lewisham High Street, Rushey Road, Catford Gyratory and Bromley Road) and the A205 South Circular Road (Brownhill Road, Plassey Road, Sangley Road, Catford Gyratory, Catford Road, Stanstead Road) form part of the Transport for London Road Network.

Traffic network, A21/A205 gyratory and A205 South Circular and related proposals

There have been discussions between LB Lewisham, the GLA and TfL over the past year or so regarding regeneration of the town centre and potential for improvements to the strategic road network to support this regeneration. More recently the Roads Task Force report has been published. This matter is to be discussed at a meeting on Monday (7 October) between Isabel Deding and the Executive Mayor and Deputy Mayor after which comments on this aspect of the Local Plan can be provided to reflect the outcome of this discussion.

Pedestrian routes and cycling

London Plan policy 6.10 states that development plan documents (DPDs) should promote the Legible London initiative to improve pedestrian wayfinding. TfL requests that policy CLP1 be amended to promote this initiative as a way of improving the walking and cycling environment within the town centre. Contributions towards Legible London signage can be sought from developers as part of a wider package of contributions.

Bus movements and bus journey times

The removal and relocation of some bus stops indicated in the document could lead to adverse effects on highway and public transport safety, capacity and operations. It is requested that further discussions take place with TfL on these proposals prior to the Local Plan being submitted.

Car parking

It is stated in this section that Catford town centre scores a Public Transport Accessibility Level (PTAL) of 6a. However there are some parts of the study area with a lower PTAL of 5. You may wish to amend the wording accordingly.

London Underground Bakerloo Line and Docklands Light Railway proposals

TfL would remind the borough that the Mayor did not pledge to extend the DLR to Bromley (p107), but rather made a manifesto pledge to investigate the feasibility of this extension. Amendments to the wording of section 5.1 are therefore requested.

Furthermore, TfL's previous comments dated 5 April on this matter, as part of the response to the Catford Town Centre Local Plan Further Options Report, still apply.

Taxis and PHVs

TfL are satisfied that the proposals now put forward for taxi and private hire vehicles have sufficiently addressed our previous concerns.

Summary

- TfL's comments on the road network and related proposals will be confirmed following the high level meeting between TfL/GLA and LB Lewisham on 7 October.
- Legible London should be supported as a wayfinding initiative
- TfL requests further discussions on the proposals to remove or relocate bus stops prior to the submission of the Local Plan.
- References to the PTAL of Catford town centre should be amended to reflect the lower PTAL of 5 found in some sites within the town centre
- TfL requests that the wording of section 5.1 (p107) be amended to reflect that the Mayor made a manifesto pledge to investigate the feasibility of extending the DLR to Bromley.

Sean Peacock
Assistant Planner, TfL Borough Planning

Email: SeanPeacock@tfl.gov.uk

cc:

Anne Crane
Andrew Hiley
Laura Stritch
Mike O'Callaghan
Tim Wells
Joanna Kesson
Debbie Canavan
Hermine Sanson – GLA