

Lewisham Local Development Framework Lewisham Town Centre Area Action Plan

issues and options report
draft

August 1 2005



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A. Background and Context

I. Introduction to AAP process

I.1 What is a Local Development Framework?

The Government has recently set an agenda to reform the planning system. New legislation (the Planning and Compulsory Purchase Act 2004) came into effect in September 2004 which stipulates that each local planning authority must produce a new set of planning policy documents called the Local Development Framework (LDF). This will replace the existing Unitary Development Plan (UDP), although the latter will be "saved" and will continue as the legal planning policy document until the LDF is introduced.

The LDF is a series of documents (local development documents) which set out comprehensively the policies which have been developed to meet the future social, economic and environmental needs of the community.

There are three tiers of documents within the LDF. Non policy and procedural documents will govern the involvement, appraisal and management of the process of LDF preparation. A series of Development Plan Documents (DPDs) will together form the statutory plans. Area Action Plans are one of those

DPDs. Supplementary Planning Documents are non statutory documents which will not contain planning policies, rather support and provide further detail, guidance and advice on how the planning process set out in DPDs is implemented.

The new legislation aims to make the planning system more responsive to changing circumstances. It will provide more opportunity for community involvement throughout the process and should ensure the process is speedier and more flexible.

With sustainable development at the heart of the new system, the Council will subject each development plan document and supplementary planning document to a rigorous sustainability appraisal. This aims to ensure that sustainability considerations are incorporated within all plans.

More information on the LDF process is available in the Guide to the New Planning System brochure which can be obtained from the Council's Planning Service and can be viewed and downloaded from the Council's website.

I.2 Lewisham Town Centre Area Action Plan

The Lewisham Town Centre Area Action Plan (AAP) will follow National Planning Policy guidance and be in general conformity with the London Plan. With

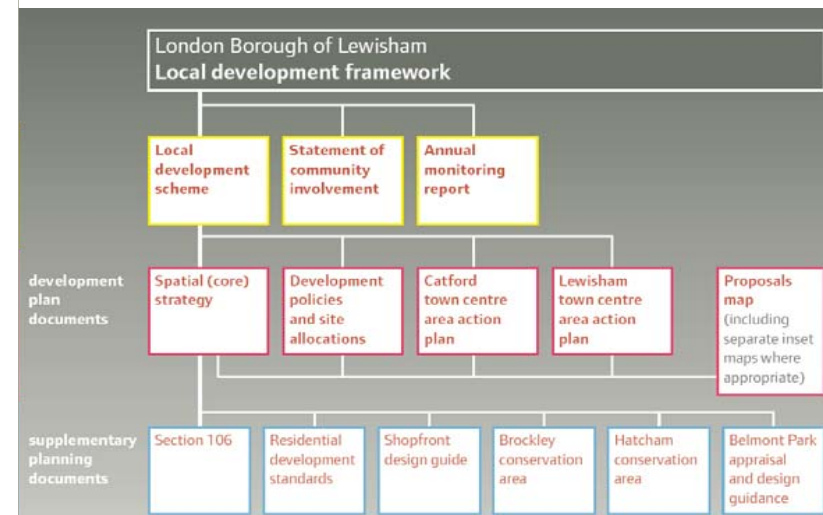


Figure 1: Lewisham LDF

respect to the other DPDs, the AAP will be consistent with the Spatial (Core) Strategy, and have regard to Development Policies and Site Allocations.

The Lewisham AAP will, in combination with the other LDF documents, replace the UDP and adopted SPGs including the Lewisham Gateway Planning Brief. The AAP will replace those policies within the existing UDP that specifically relate to Lewisham Town Centre.

Figure 1, illustrates the range of documents which make up the LDF, which include the Lewisham AAP.



1.3 Why is the Council preparing an Area Action Plan for Lewisham Town Centre?

The first two AAPs to be prepared cover Lewisham and Catford town centres. It is appropriate that AAPs are prepared for both these town centres as they are areas where rapid change is anticipated. Both areas have been defined within the UDP and the London Plan as "Major Centres". The AAPs will set out a comprehensive range of policies and proposals for development in these town centres. It will include major redevelopment opportunities, conservation and detailed development control policies, as well as changes relating to traffic and transport infrastructure.

The AAPs will aim to stimulate development interest and encourage regeneration projects whilst protecting those areas sensitive to change. They will have a strong implementation focus and will provide the framework for implementing regeneration initiatives.

1.4 What is the process for producing the Area Action Plan?

Government guidance sets out a clear process for producing a development plan document. The AAP must be prepared in accordance with the Local Development Scheme and in compliance with the Statement of Community Involvement. The Local Development Scheme (February 2005) is a project plan which sets out details on how and when the Council will prepare and implement the new planning framework in Lewisham. The Statement of Community Involvement will outline the standards which the

Council intends to achieve when involving the community in the plan making process.

The plan and its policies must have been subjected to a sustainability appraisal (see 1.4 below). In addition the AAP should be consistent with national planning policy and in general conformity with the London Plan. Proper regard should also be given to relevant plans, policies and strategies including the authority's community strategy.

The AAP should be coherent and consistent with the other development plan documents in the LDF (see figure 1, above). The AAP should represent the most appropriate in all circumstances, having considered the relevant alternatives, and be founded on a robust and credible evidence base. As such, the AAP will go through the following process (see figure 2, right). The evidence gathering stage of the AAP has been completed and is set out in the Lewisham AAP Scoping Report (May 2005).

1.5 How will we ensure that the AAP is sustainable?

Government guidance ensures that sustainability is integrated within the AAP process. This is achieved through the parallel process of Sustainability Appraisal. The purpose of Sustainability Appraisal (SA) is to examine the impact of policy and proposals and their assessment in terms of ensuring they result in or enable sustainable development.

The first stage of the AAP process was to produce a Sustainability Scoping Report which was undertaken in May 2005. The

Scoping Report includes a thorough review of the other plans, programmes and objectives relevant to the AAP, an overview of baseline information and trends, and the proposed Sustainability Appraisal Framework including sustainability objectives and indicators.

This report incorporates an Initial Sustainability Appraisal of the alternative options (see section 3). At the preferred options stage, a full Sustainability Appraisal will be undertaken, and prepared in a separate report.

1.6 The role of the community and stakeholders

A series of Issues & Options Papers have been prepared covering a wide range of matters which need to be reviewed by the Council. All are the subject of extensive consultation. In preparing this and other Issues & Options Papers, the Council is looking to the community and stakeholders to tell us the following:

- What you think of the options presented;
- What improvements could be made to the options;
- Which are your preferred options that you want the Council to take forward and
- Any options we haven't considered that you would like us to consider before identifying a preferred option(s).

In thinking about the options presented, it must be remembered that the preferred option may not be a single discrete option presented below, but rather may be a combination of a range of options taking the best parts of each.

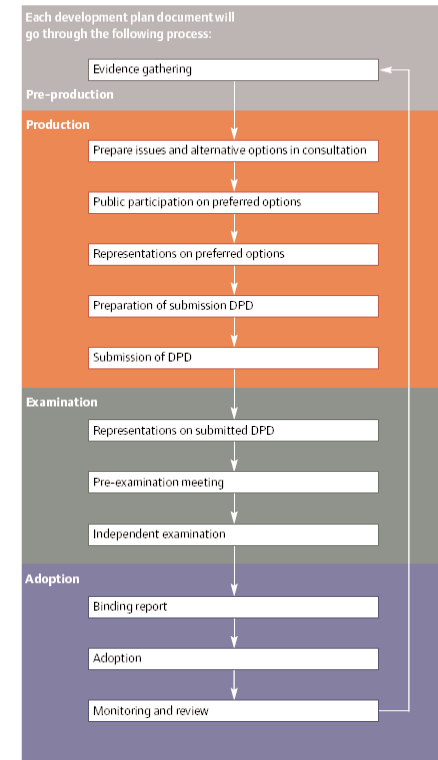


Figure 2: AAP process



2. Lewisham Town Centre context

2.1 Strategic context

Lewisham Town Centre has significant potential. It is in a dynamic and strategic location which is designated a Major Centre in the London Plan (2004). Lewisham Town Centre is especially well connected to central London by rail and DLR and has developed as an important retail and service centre, focusing on the vibrant street market, and the Riverdale shopping centre.

Lewisham Town Centre is situated within the London Thames Gateway, which is a major focus of the Government's Sustainable Communities Action Plan. The London Thames Gateway Development and Investment Framework (April 2004) sets out a vision for the Thames Gateway including "a well designed mixture of houses, a range of job opportunities, excellent social and cultural infrastructure and good transport connections".

The London Plan (2004) designates Lewisham as a 'Major Centre' and identifies the town centre as a strategic centre within the East London sub-region. In this context, the London Plan states that centres such as Lewisham "should be considered as opportunities for more intense development and boroughs should consider how their roles should be consolidated or enhanced to meet retail and other consumer needs and to increase capacity for mixed-use development including housing" (para. 5.89).

It is also noted that the town centre might have the potential to provide "more accessible and more sustainable alternative attractions to regional shopping centres outside London and to increase housing and viable employment capacity" (para. 5.89).

The recently published consultation draft of the East London Sub-Regional Development Framework (SRDF) supports the case for growth in Lewisham Town Centre with expenditure expected to increase by 40% by 2016 (para 128). The SRDF also states that it would be appropriate to review the role and function of this centre following completion of development in the town centre which reflects the Council's aspiration for Lewisham to become a Metropolitan town centre.

2.2 Town Centre Development Context

A number of initiatives are already underway in Lewisham town centre. The Urban Renaissance in Lewisham SRB programme is focused on bringing forward the comprehensive redevelopment of the roundabout site between Lewisham Station and Lewisham High Street. Lewisham Gateway is set to bring new shops, leisure facilities, residents and employment opportunities to Lewisham. The Council along with the London Development Agency, Transport for London and London Bus Services has appointed development partners (Lewisham Gateway Developments) for the Gateway development, and a planning application for the site is anticipated in 2005.

The Riverdale Centre has recently been purchased by Land Securities who are reviewing the aspirations for the shopping centre. There may be scope for the redevelopment of the centre, and the new owners are also reviewing a proposal to build a new department store as a northern extension to the existing centre instigated by the previous owners. The comprehensive redevelopment of the Sundermead Estate is progressing in parallel with work on Lewisham Gateway and represents a major step in delivering improvements in quality of life and the urban environment in the town centre.

2.3 Lewisham Town Centre Development Strategy

The Lewisham Town Centre Development Strategy was prepared by a consultant team led by Urban Practitioners on behalf of the London Borough of Lewisham, the London Development Agency and the Greater London Authority. The Strategy sets a new vision for Lewisham town centre, defining a context for investment and change over the next ten to fifteen years. This document is not a formal planning document and does not have statutory weight. However, extensive consultation was undertaken during the course of the project which has been reviewed in the Sustainability Scoping Report. The Strategy was used to inform the preparation of issues and options.



3. Area Action Plan vision and objectives

3.1 Vision

Lewisham Council and the Lewisham Strategic Partnership have adopted a vision for the borough as set out in the Community Strategy. This vision statement is:

'Together we will make Lewisham the best place in London to live, work and learn'.

A vision for Lewisham town centre was developed during the preparation of the Town Centre Development Strategy, as follows:

'Lewisham town centre will be a metropolitan destination of exceptional quality; a bustling urban centre and first class shopping and leisure destination. The town centre will benefit from sustainable and diverse new residential communities, attractive waterfront environments and a network of vibrant public parks, streets and open spaces.'

3.2 Themes

The challenge is how this vision is implemented through a spatial and land use planning framework. This framework will be developed using the following themes:

i Creating a first class environment

- To deliver the highest quality environment throughout the town centre for the benefit of all its users and to encourage new inward

investment; and

- To improve Lewisham river environments

ii Developing a prosperous economy

- To ensure that the town centre economy prospers and flourishes;
- To prioritise investment in existing town centre businesses, including the market and independent retailers;
- To make the centre a more attractive place to invest and to achieve Metropolitan status; and
- To develop a diverse, vibrant, high quality and well-managed evening economy.

iii Ensuring effective linkages and movement

- To improve public transport; pedestrian and vehicular networks in the town centre, and open up links between the town centre and the residential communities to the east and west.

iv Fostering sustainable, well-served communities

- To enhance amenity and improve quality of life, safety, perceptions of safety, and provide new community facilities;
- To create significant numbers of new homes in the town centre, creating new balanced and sustainable communities;
- To deliver the highest levels of social, environmental and economic sustainability, and encourage sustainable building technologies; and
- To improve sense of place identity and foster civic pride through the provision of a network of high quality streets and public spaces, and high quality new

development.

3.3 Area Action Plan Objectives

The following objectives have been derived utilising the results of the review of policy, programmes and objectives. The objectives have been organised by theme, to ensure that the AAP covers the full scope of issues and topics defined by statutory documents in the planning framework and contextual strategic documents.

Objective 1 - Housing:

To maximise the provision of high quality housing in the heart of Lewisham town centre, of a range of unit size and tenure type; and, in line with the London Plan (2004), to meet housing need, deliver an appropriate level of affordable housing, and implement sustainable patterns of housing development with highest densities focused at highly accessible public transport interchanges.

Objective 2 - Retail and town centre status:

To support and improve the vitality and viability of Lewisham town centre, with a view to achieving Metropolitan status.

Objective 3 - Urban Design:

To promote a design-led approach to new development in Lewisham town centre.

Objective 4 - Employment:

To support an appropriate supply of employment generating uses and sites within the town centre.

Objective 5 - Open space/recreation:

To maintain, protect and improve the supply of open space within the town centre, and to incorporate recreational and open space within new developments.

Objective 6 - Transport:

To encourage more sustainable patterns of transport development in Lewisham town centre.

Objective 7 - Environment:

To support the principle of environmentally sustainable development at the local scale.

Objective 8 - Leisure and community:

To support Lewisham town centre in becoming a more accessible and socially inclusive place with adequate provision of community and leisure facilities

Objective 9 - Implementing and monitoring the AAP:

To develop an AAP which responds to local and strategic context.



4. Incorporating Sustainability

In addition to undertaking an Initial Sustainability Appraisal of options (see page 51), it is vital that the process of identifying issues is undertaken in an integrated manner. The basis for this exercise is the Sustainability Scoping Report which sets out a series of social, environmental issues.

These have been generated using a systematic approach based on government guidance on undertaking Sustainability Appraisals (SA). The components of this methodology are briefly set out below:

Relevant Plans, Programmes and Objectives (Task A1):

A thorough review of all plans, programmes and related sustainability objectives that are relevant to the Lewisham AAP

Baseline information (Task A2):

Review of baseline information set out in plans, strategies and reports.

Emerging issues from consultation:

Review of issues emerging from consultation undertaken as part of the Lewisham Town Centre Development Strategy. Consultation was undertaken with key stakeholders through the following means: steering group meetings; Town Centre Walking Audit Event; two Town Centre Information Days; and stakeholder meetings with Councillors, landowners, street traders, the SRB board, the voluntary sector, and other key

local representatives.

Synthesis of key sustainability issues of the SA (Task A3):

Using the output of the three techniques described above, key sustainability issues were identified. This exercise formed the basis of the proposed Sustainability Appraisal Framework which has been used as a means for interrogating the integrity of the options identified in this report.

UDP and SPG cross-referencing:

Whilst the UDP and Gateway SPG do not set a context for the AAP, it is useful to review their scope, to ensure that the AAP covers the same range of policy themes and topics, regardless of whether the policy content is subject to change. This exercise was also undertaken within the Scoping Report (see Annex A).

AAP issues have been developed using the outputs of the five constituent elements of the scoping report above. This has ensured a thorough approach, situating sustainability considerations at the heart of the AAP process.



B. Issues and Options

Overview

Lewisham town centre is the Borough's most important commercial centre. It is the Borough's largest shopping centre and benefits from good levels of public transport accessibility. Whilst the centre does not currently benefit from a department store, a wide range of national retailers enjoy a High Street location including Marks and Spencer, Boots and Littlewoods. A thriving street market operates from the High Street providing for the everyday needs of the local community. Lewisham railway station benefits from good links to central London and since the extension of the Docklands Light Rail to Lewisham in 1999, the town has benefited from fast and direct access to Canary Wharf. A wide range of employers provide services from Lewisham with major employers including the Police (a divisional headquarters has recently opened in the town centre) and CitiBank who occupy the town's most prominent landmark, CitiBank tower.

The Lewisham Town Centre Area Action Plan will provide a comprehensive planning policy statement for the town, with policies covering all major planning policy issues including housing, shopping and transport. In light of the evidence base which is summarised in the Sustainability Appraisal Scoping Report, issues are identified under each of the

various policy themes for the town centre. Against these issues, options for how town centre policy might respond are suggested. Generally, in an attempt to make this document as open and accessible as possible, these issues and options have been posed as questions and answers respectively.

We want your views on the issues and options put forward in here. We'd like you to respond by identifying your preferred options for each of the issues raised. We would also like you to raise any additional issues together with views on how these additional issue might best be addressed in the emerging Area Action Plan for Lewisham town centre. In thinking about the options presented, it must be remembered that the preferred option may not be a single discrete option presented below, but rather may be a combination of a range of options taking the best parts of each .

I. Housing

Issues and scope of AAP

The Issues and Options of the AAP cover a range of housing issues, but not an exhaustive list of topics as defined by the current UDP. Generic policies and criteria will be covered to a large extent by the Spatial (Core) Strategy and Development Control Policies in the LDF. However, a review of housing objectives and baseline trends has identified a number of issues which are of specific importance to Lewisham town centre. These issues are:

LTC1

How much of the Borough's housing allocation should be accommodated in the town centre?

LTC2

Should a specific approach to affordable housing be taken in Lewisham town centre?

LTC3

In order to ensure the best use of land is being made, how can higher density development most effectively be encouraged?

LTC4

How can the housing needs of the travelling community best be met?

Other issues

Other housing issues may be relevant to the town centre, although the above were considered the most important housing issues specifically relevant to Lewisham town centre. Borough wide housing policy is the subject of a separate issues and options consultation paper. However, it is important to understand that the AAP will be a comprehensive policy document for the town centre which will replace the policies relevant to the town centre in the current UDP. It is therefore considered worth reviewing the scope of the current housing policy contained in the UDP. Chapter 5 of the UDP sets out the Borough's approach to housing policy. Existing policies which may be relevant to Lewisham town centre but not considered to represent key issues seek to achieve the following:

- Protect the loss of residential properties
- Enhance the character and amenity of residential areas
- Ensure a mix and balance of residential provision to meet full range of housing needs
- Encourage housing development on Previously Developed Land
- Improve and safeguard residential amenity
- Provision of sufficient housing sites

- Dwelling mix
- Standards and criteria relating to gardens, extensions and backland and in-fill development
- Conversion from/to residential property
- Density criteria
- Achieve greater self-containment in Houses in Multiple Occupation
- Provision of bed and breakfast accommodation
- Provision of special needs housing

The issues considered most relevant to Lewisham town centre are considered in the following section, together with options for how these issues might be addressed. We would welcome your comments on these issues and options. If you would like to raise additional housing issues and options, please take this opportunity to do so.



HOUSING

LTC1: THE BOROUGH HAS A TARGET OF 17,350 ADDITIONAL DWELLINGS (TO 2016). HOW CAN HOUSING NEED BEST BE MET IN THE TOWN CENTRE?

WHAT IS THE ISSUE?

The Council is required to maximise the re-use of previously developed land and the conversion and re-use of existing buildings. It is considered that Lewisham town centre has significant potential to contribute to meeting a significant proportion of the Borough's housing requirement as a number of the Borough's major redevelopment opportunities are now considered to be in Lewisham. Additional housing should vary in size to ensure that it meets the varying needs of the community.

WHAT DO OTHER PLANS AND PROGRAMMES SAY?

PPS6 (ODPM, 2005) implies that the following uses should be prevalent in town centres: retail; leisure and entertainment; offices; and arts, cultural and tourism (para 1.8). In addition, housing will also be an important element in most mixed-use, multi-storey development. (para 1.9). PPG3 emphasises the importance of planning to create more sustainable patterns of development, prioritising the re-use of previously developed land (PDL) for housing, meeting the needs of the community and encouraging high standards of design. With respect to town centres, PPG3 advocates conversion of upper floors and re-use of vacant commercial premises; the use of CPO powers to achieve site assembly; housing development around transport nodes; housing as part of mixed use development; and greater density in town centres and transport nodes.

In terms of existing allocations, the UDP lists the following sites:

- Ladywell Police Station, Ladywell Road for housing;
- Garages Site, Cressingham Road for housing;
- 102-120 Lee High Road for retail or mix of retail and residential;
- King of Lee site, 256-258 Lewisham High Street for BI employment or housing (since completed);
- Silver Road Depot, employment generating uses including a mix of BI, residential and hotel;
- 206-210 Lewisham High Street, and 'Model Market' for retail and residential above with refurbishment of market;

The current population of the Lewisham Central Ward is 13,190, which is approximately 5% of the Borough's total population which stands at 248,922 (Office of National Statistics, Census 2001).

OPTIONS

- LTC1A** Have policies seeking to increase the density of residential uses (see Issue LTC3).
- LTC1B** Have policies encouraging the redevelopment or conversion of existing sites with residential uses as part of a mix (e.g. employment/retail ground floor with residential above).
- LTC1C** Promote new development in the town centre including residential uses as part of a mix of uses. This could be achieved by the allocation of specific additional sites in the town centre to include some residential development of varying size and tenure.

CONSIDERATIONS AND IMPLICATIONS

Local Planning Authorities must take a positive approach to increasing the density of development in suitable locations. However, as the density of new development increases it is important to protect the existing amenities enjoyed by those who already reside or enjoy an area.



The national planning policy agenda is now fully supportive of the promotion of mixed use development in town centres. Mixed use development is defined in the Lewisham UDP as development that includes residential development. However, mixed use development presents a number of issues and challenges:

- Management issues: the development industry has tended to favour single use developments because they are easier to manage;
- Mixing of uses can have the effect of locking up sites for a relatively long period of time (e.g. in Catford above Tesco);
- Reduces site flexibility; and
- Design quality is critical.

Increasing the density of residential uses in the town centre might lead to the increasing scale (height and bulk) of development proposals. This could affect the character of the town centre.



HOUSING

LTC2: THE BOROUGH OF LEWISHAM REQUIRES 7,250 TO 12,950 AFFORDABLE DWELLINGS FROM 2000 TO 2008 TO MEET FUTURE HOUSING NEED. SHOULD THERE BE A SPECIFIC TOWN CENTRE AFFORDABLE HOUSING POLICY?

WHAT IS THE ISSUE?

Affordable housing provision is a strategic issue for the whole of London. The Mayor of London has defined a strong policy position on affordable housing which is premised on the policy objective that the housing needs of the whole community should be met. The Spatial (Core) Strategy will define a Borough wide affordable housing policy which has regard to the Mayor's London-wide target. This will replace a series of policies in the current UDP. The issue relating specifically to Lewisham town centre is whether there are reasons to take a particular approach to affordable housing which differs from the general approach taken elsewhere in the Borough.

WHAT DO OTHER PLANS AND PROGRAMMES SAY?

Policy direction from other plans and programmes relating to affordable housing is summarised in Part 2 of the Housing Issues and Options Paper. The existing UDP does include a policy whereby a different approach is taken in specific geographical areas. Where the proportion of socially rented accommodation is over 45% of existing stock, existing policy seeks to avoid further concentrations of affordable housing by encouraging appropriate levels of off site contribution

OPTIONS

- LTC2A** No specific affordable housing policy is required for Lewisham town centre, borough wide affordable housing policy should be adhered to.
- LTC2B** A policy which takes a more flexible approach to the provision of affordable housing in Lewisham town centre in terms of size, tenure, location and quantity of provision. This may result in the delivery of fewer affordable homes than option LTC2A.
- LTC2C** A policy approach which seeks to deliver a higher proportion of affordable housing in Lewisham town centre. This may result in the delivery of more affordable homes than option LTC2A.

CONSIDERATIONS AND IMPLICATIONS

A decision to take a different affordable housing policy approach would need to be clearly justified. Using figures from the 2001 Census, 32.9% of residents live in socially rented accommodation in Lewisham Central Ward. This would not justify the need for a specific policy approach in the town centre if the existing policy threshold of 45% was retained. However, other factors that might justify taking a different policy approach to the provision of affordable housing might include public transport accessibility and/or accessibility to shops and other services.

Taking a more relaxed approach to the provision of affordable housing in the town centre could assist in bringing key sites forward for redevelopment more quickly as it would reduce the overall development costs. It might be considered that such an approach has regenerative benefits for the town and the Borough. Seeking to deliver a higher proportion of affordable housing on town centre sites may assist in delivering mixed and balanced communities but such an approach may lead to fewer sites coming forward for redevelopment as the associated development costs would increase.



LTC3: HOW BEST CAN THE AAP PROCESS PROMOTE HIGHER RESIDENTIAL DENSITIES IN AREAS OF HIGH PUBLIC TRANSPORT ACCESSIBILITY?

WHAT IS THE ISSUE?

Local Planning Authorities have to seek to ensure that the best use is made of previously developed land. This issue seeks to explore whether a different approach should be taken to that set out in existing UDP policy.

WHAT DO OTHER PLANS AND PROGRAMMES SAY?

PPG3 (2002) emphasises the need to create more sustainable patterns of development by building in ways which 'exploit and deliver accessibility' by public transport to the full range of infrastructure and services, supporting greater density in town centres and transport nodes. This approach is mirrored in the UDP's current designation of Sustainable Living Areas (HSG13) in locations which are considered to have real potential for sustainable development and innovative forms of urban living on the basis of their accessibility to town centre services and public transport links. Within Sustainable Living Areas (SLAs) a more flexible approach to the application of on street parking, open space and other parking standards is permitted. Lewisham Town Centre is currently defined as an SLA.

OPTIONS

- LTC3A** Retain existing Sustainable Living Area approach (as defined in the existing UDP).
- LTC3B** Promote car-free housing.
- LTC3C** Consider removal of rights to a street parking permit for occupiers of new residential developments.

CONSIDERATIONS AND IMPLICATIONS

The principle of minimising residential car parking is supported by national and regional policy. However, it is vital that car free development is supported by a comprehensive and integrated approach to transport and accessibility. Lewisham Town Centre has excellent public transport links, but there is definite scope for improvements to the pedestrian environment which are vital if local residents living in minimum car developments are able to access services and amenities.



LTC4: HOW SHOULD THE AAP MAKE PROVISION FOR THE TRAVELLER COMMUNITY ?

WHAT IS THE ISSUE?

The Government defines gypsies and travellers as 'a person or persons who have a traditional cultural preference for living in caravans and who either pursue a nomadic habit of life or have pursued such a habit but have ceased travelling, whether permanently or temporarily, because of the education needs of their dependant children, ill-health, old age, or caring responsibilities (whether of themselves, their dependents living with them, or the widows and widowers of such dependents), but does not include members of an organised group of travelling show people or circus people, travelling together as such'.

Although it will be necessary for the Core Strategy to set out a Borough-wide policy relating to the use of land for travellers, the Borough's only existing serviced site is situated in Lewisham town centre, located in Thurston Road immediately adjacent to the railway station. The site is part of a £200 million regeneration plan which will improve access to transport interchange, improve the local environment and boost the local economy. The location of an alternative site on which to provide new and improved facilities is an issue faced by Lewisham.

WHAT DO OTHER PLANS AND PROGRAMMES SAY?

PPS3 seeks to ensure the housing needs of all in the community are met. In addition to this, the Government has a circular (1/94) specifically relating to this issue. The Government is currently consulting on a revision to Circular 1/94 which addresses Gypsy Sites and Planning. The draft revised circular would require that where a need is demonstrated, sites should be identified to meet it. It also outlines that regardless of whether there is a need, criteria based policies for assessing future applications for Gypsy and Travellers' sites is required. Consideration of the impact of mixed uses as part of a site is also required. The draft revised circular also reinforces the need for local housing needs assessments to consider the needs of Gypsies and Travellers.

The draft revised circular continues to outline that the following considerations should be made:

- The promotion of peaceful and integrated co-existence between the site and local community;
- Highways considerations;
- Noise and other disturbance from the movement of vehicles to and from the site;
- The stationing of vehicles on the site;
- On-site business activities.

The London Plan seeks to ensure that the needs of all in the community are met. The UDP currently contains Policy HSG20 Travellers Sites which identifies the criteria against which applications for sites will be assessed. These criteria include the site size and suitability, access to local services, highway considerations and the need for travellers sites.

OPTIONS

- LTC4A** Identify and allocate a traveller site within Lewisham town centre.
- LTC4B** Identify and allocate a traveller site outside Lewisham town centre.
- LTC4C** Include a criteria based policy in order to provide a framework to assess the suitability of new proposals.

CONSIDERATIONS AND IMPLICATIONS

Given that the existing traveller site on Thurston Road is not considered suitable by either the Council or the traveller community



who occupy the site, it is considered important to address this issue in the preparation of the Lewisham Town Centre Area Action Plan. However, with the emphasis on increasing densities and making best use of brownfield land, identifying a suitable site to accommodate the traveller community represents a significant challenge.



HOUSING

2. RETAIL AND TOWN CENTRE STATUS

Issues and scope of AAP

The Issues and the Options of the AAP cover a range of retail and town centre issues, but not an exhaustive list of topics as defined by the current UDP. Generic policies and criteria will be covered to a large extent by the Spatial (Core) Strategy and Development Control Policies in the LDF. However, a review of retail and town centre objectives and baseline trends has identified a number of issues which are of specific importance to Lewisham town centre. These issues are:

LTC5

How can Lewisham town centre best move towards Metropolitan Centre status?

LTC6

How can Lewisham town centre's vitality and viability best be supported?

LTC7

If implemented, Lewisham Gateway has the potential to bring wide ranging benefits to the town centre. How should the AAP address the issues associated with Lewisham Gateway?

LTC8

What approach should the AAP take to the designations of core and non-core shopping frontages?

LTC9

How should the town centre's potential for a more vibrant evening economy be managed?

LTC10

Should the town centre boundary be altered?

Other Issues

Other retail and town centre issues may be relevant to Lewisham town centre, although the above were considered the most important retail and town centre issues specifically relevant to Lewisham town centre. The AAP will be a comprehensive policy document for the town centre which will replace the policies relevant to the town in the current UDP. It is therefore considered worth reviewing the scope of the current retail and town centre policy contained in the UDP. Chapter 8 of the UDP sets out the Borough's approach to retail and town centre policy. It is envisaged that many areas of retail policy will not change significantly, however existing policies which may be relevant to Lewisham town centre but which are not considered necessary to represent key issues seek to achieve the following:

Location of new retail stores and cinemas: New retail provision and

cinemas are encouraged in town centre locations.

Prevent the loss of local shopping parades and corner shops: The Council aims to protect the character, vitality and viability of local shopping parades.

The issues considered most relevant to Lewisham town centre are considered in the following section, together with options for how these issues might be addressed. If you would like to raise additional retail and town centre issues and options, please take this opportunity to do so.

LTC5: HOW CAN LEWISHAM TOWN CENTRE BEST MOVE TOWARDS METROPOLITAN CENTRE STATUS?

WHAT IS THE ISSUE?

Lewisham town centre is the Borough's largest and most important retail centre. However, over recent years the centre has suffered as a result of the relative success of competing town and shopping centres such as Bromley and Bluewater. A major objective of the Area Action Plan will be to provide a framework to enable Lewisham to improve the quality of its retail offer.

WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THE ISSUE?

PPS6 sets out the government's vision for enhancing the vitality and viability of town centres, underpinned by retail, leisure and entertainment, office, and arts, cultural and tourism uses. PPS6 encourages a plan-led approach to growth in town centres, which respects the retail hierarchy. The London Plan (2004) identifies Lewisham as a 'Major Centre'. The London Plan includes policies on town centres promoting their suitability for a range of uses within which support is given to new retail and commercial development with policies promoting improved access to town centres and focussing development. It defines a threshold of 100,000 sqm of retail floorspace as a threshold for Metropolitan status in quantitative terms.

The Council supports the town centre's potential to expand upon its current designation in the London Plan as a Major Centre, to become a Metropolitan centre. The London Borough of Lewisham Retail Capacity Assessment and Site Allocation Study states that the centre has a total gross retail floorspace of 79,246 sqm. and 317 units within the centre boundary (GOAD, 2003). Paragraph 6.6 states that the quantitative and qualitative assessment of the potential capacity for new retail floorspace suggests that there may be significant scope for new retail development within Lewisham. This view is supported by draft East London Sub Regional Development Framework (SRDF) which states that expenditure in Lewisham is expected to increase by 40% by 2016 with the implementation of new development proposals in the centre. It is envisaged that it would be appropriate to review the role and function of the town centre following completion of development.

The existing Gateway SPG sets a context for developing new retail floorspace as part of a mix of uses on the Interchange site, which is viewed as the principal means by which retail floorspace can be increased in the town centre.

OPTIONS

- LTC5A** Rely on existing site allocations for new retail developments in the town and determine applications for additional retail developments on their merits.
- LTC5B** Allocate new sites for retail development with regard to the retail capacity study in order to plan for and accommodate identified retail capacity to help the town centre move toward the floorspace required to achieve Metropolitan Status (100,000m²).

CONSIDERATIONS AND IMPLICATIONS

Lewisham recently prepared Retail Capacity Assessment and Site Allocation Study identified several sites within the town centre considered suitable for retail development that would go towards meeting identified need. These include the Lewisham Gateway site, the Loampit Vale area (north and south), the former Hartwell Ford garage site on Lee High Road and the Phase 2 Lewisham Gateway site which abuts the northern end of the Lewisham Centre.

The Retail Capacity Study also recommends that the majority of new retail development in the Borough should be developed in and



around the Gateway area, i.e. the northern end of the shopping centre. If this approach is taken, the implications for the southern end of the High Street would need to be considered.

However, it is considered that the quality of the existing centre might be at risk if no additional retail floorspace is delivered. There is significant competition from other centres, and this would be supported by realising the potential for retail growth. Retail growth would also increase the viability of the centre for other town centre uses which will contribute to the sustainable development of Lewisham as a whole.

Additional retail development in Lewisham could generate traffic, which could have a negative impact on the local environment for residents and visitors. It could also result in increased demand for car parking spaces.

RETAIL AND TOWN CENTRE STATUS



LTC6: HOW CAN LEWISHAM TOWN CENTRE'S VITALITY AND VIABILITY BEST BE SUPPORTED?

WHAT IS THE ISSUE?

Vitality and viability are at the heart of the Government's approach to planning for town centres. Therefore, the need to ensure that the vitality and viability of Lewisham town centre is promoted and enhanced is important.

WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THIS ISSUE?

As explained in LTC5, PPS6 seeks to support the vitality and viability of town centres. In addition to the quantity of floorspace, it is also important to maintain and enhance the quality of the retail offer. Town centres are likely to incorporate retail, leisure and entertainment, office, and arts, cultural and tourism uses. The guidance emphasises the need for a planned approach to growth in the town centre. As noted above, there is a context for increasing town centre retail capacity in Lewisham. The issue of supporting vitality and viability is multi-faceted given the range of uses in the town centre. The following options are diverse and reflect the importance of a joined-up approach, balancing the need for supporting existing retail uses, and supporting the sustainable growth of the town centre.

The existing approach defined in the UDP designates Core Shopping Areas where change of use involving floor level class A1 is resisted, defining criteria for non-retail development or change of use. Designated non-core shopping areas are more flexible with respect to change of use from an A1 shop. Other shopping areas allow change of use from A1 under most circumstances.

The UDP also provides policies relating to uses other than A1 in the town centre such as the evening economy.

As noted in LTC5, the Gateway development presents the potential for supporting the vitality and viability of the town centre. A number of other sites are also coming forward which could support the vitality of the wider town centre.

Options for LTC6 cover a broad range of areas which relate to specific issues dealt with elsewhere in the issues and options report.

OPTIONS

- LTC6A** Public realm enhancements
- LTC6B** Encourage new development on the Lewisham Gateway site to raise profile of town centre as a whole.
- LTC6C** Support a greater mix of uses including cafes, bars and other evening economy uses to support vitality of retail offer
- LTC6D** Make Lewisham a safer place
- LTC6E** Support shopfront improvements and funding programmes.
- LTC6F** Allocate new sites for retail development.
- LTC6G** Encourage a greater mix of uses within the town centre including residential development (see LTC1)
- LTC6H** Re-development at key locations within the High Street to provide marker buildings with a mix of uses.

CONSIDERATIONS AND IMPLICATIONS

There will be no one option to protect and promote the town centre's vitality and viability. The options listed above are diverse and emphasise the holistic range of proposals which could support town centre vitality and viability. Vitality and viability are affected by a

RETAIL AND TOWN CENTRE STATUS



wide range of factors, and as such it is important that individual proposals, particularly those for additional retail space and residential growth are supported by sound urban design and community policies in particular.

RETAIL AND TOWN CENTRE STATUS



LTC7: IF IMPLEMENTED, LEWISHAM GATEWAY HAS THE POTENTIAL TO BRING WIDE-RANGING BENEFITS TO THE TOWN CENTRE. HOW SHOULD THE AAP ADDRESS THE ISSUES ASSOCIATED WITH LEWISHAM GATEWAY?

WHAT IS THE ISSUE?

The SRB supported Lewisham Gateway development on the site of the existing roundabout between Lewisham Station and Lewisham High Street will, if implemented, provide a very significant amount of commercial and residential development in the town centre with only a relatively small amount of existing accommodation being replaced. It is likely that the development will result in a shift in the centre of gravity for the town northwards towards the station. Lewisham Gateway is likely to deliver a significant amount of comparison retail floorspace which is likely to attract some national retail multiples.

In addition to planning for the benefits Lewisham Gateway will bring, an important issue for the future of the town will be management of the structural changes that are likely to result from the implementation of Lewisham Gateway. In particular, how will the southern end of the shopping centre and the area around the library be affected and what can the AAP do to assist in the management of this change?

WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THIS ISSUE?

National planning policy and the London Plan are generally supportive of focusing major traffic generating uses in town centres where levels of public transport accessibility are at their highest. PPS6 provides guidance on promoting growth and managing change in town centres. This guidance contained in paras 2.3 - 2.8 of PPS6 is directly relevant to Lewisham Gateway which will extend the primary shopping centre to the north towards the railway station. Also in this section of PPS6 is guidance on the management of parts of town centres which are undergoing change, suggesting that reviewing the role and function of the centre may be appropriate. Promoting and developing specialist or new roles, encouraging specific types of uses, consolidating centres and promoting more diversification of use are all offered as possible appropriate policy directions.

The draft Sub Regional Development Framework for East London (GLA, May 2005) identifies that a major comparison goods shopping development is in the pipeline and suggests that the status of the town centre in London's retail hierarchy may need to be reviewed in light of these proposals.

The Lewisham Gateway proposal is already supported and promoted by Lewisham Council through the adoption of the Lewisham Gateway planning brief, adopted in December 2002. The Lewisham Town Centre Development Strategy provides guidance on many of the town's key sites with the aim of seeking to ensure that the positive effects of Lewisham Gateway are felt across the centre as a whole.

OPTIONS

- LTC7A** Allocate the Lewisham Gateway site for high density mixed use development.
- LTC7B** Rely on existing development site allocations in the UDP to facilitate redevelopment of the roundabout site.
- LTC7C** Identify and allocate sites in the southern part of the centre for redevelopment in order to seek to address the change in the centre of gravity that is likely to result from the Lewisham Gateway development.
- LTC7D** Consider whether the southern part of the High Street and shopping centre could develop a new role to complement the prime retail. This role might be a focus for community activity, with the library representing an obvious stimulus for this type of activity. An alternative focus would evening economy uses.

RETAIL AND TOWN CENTRE STATUS



CONSIDERATIONS AND IMPLICATIONS

Where there is scope for retail centres to grow, PPS6 makes clear that this growth should ideally take place as an extension to the primary shopping area. Given that Lewisham Gateway is still at an early stage of implementation and does not yet benefit from planning permission, it is not possible formally to extend the designated primary shopping area. The option for allocating a site for Lewisham Gateway would be one way of facilitating the development.

There is little doubt that Lewisham Gateway will have a significant impact on the town centre as a whole. It is therefore considered important to ensure that a strategy and policy position is developed which is capable of dealing with the impacts such a major development will bring on the town centre as a whole. In seeking to address the concerns over a likely northerly shift in gravity of the centre, sites such as the Model Market are identified in the Site Overview, Section C, and redevelopment of this and other sites should help these less central areas of the town centre retain their vitality and viability.

RETAIL AND TOWN CENTRE STATUS



LTC8: WHAT APPROACH SHOULD THE AAP TAKE TO THE DESIGNATION OF CORE AND NON-CORE SHOPPING FRONTAGES?

WHAT IS THE ISSUE?

The preparation of the Area Action Plan raises the opportunity to review the approach taken in Lewisham town centre to the control of shopping uses. With there being quite discrete shopping character areas in the town, it is considered that the main issue is whether a new area based approach could be taken to the control of shopping uses.

WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THIS ISSUE?

PPS6 encourages Councils to define the extent of the primary retail frontage in town centres and also suggests that secondary frontages allow for a greater diversity of uses. The Amended Use Classes Order (2005) and Licensing Act (2003) also provide a context for the review of the traditional approach to frontages. The London Plan, under Policy 3D.1, states that Boroughs should designate core areas primarily for shopping uses and secondary areas for shopping and other uses.

The existing UDP designates core and non-core shopping areas under Policy STC4/5 (see also Issue LTC5):

Core areas:

The Lewisham Centre; and
70-212 Lewisham High Street.

Non-core areas:

85-229 and 236-252, 262-328 Lewisham High Street;
2-32 and 1-43 Lewis Grove;
33-83 Lewisham High Street; and
1-91 and 6-116 Lee High Road.

Other areas:

233-327 and 266-340 Lewisham High Street

OPTIONS

- LTC8A** Maintain current distinction between core and non-core frontages as currently shown on the proposals map.
- LTC8B** Review existing allocation of core and non-core frontages.
- LTC8C** Introduce a geographical basis for designating retail zones with scope for integrating a more diverse mix of uses including evening economy.
- LTC8D** Remove shopping frontage allocations and rely on town centre boundary.

CONSIDERATIONS AND IMPLICATIONS

The designation of primary and secondary shopping frontages provides a degree of certainty for developers and retailers. However, it could be said that such an approach is inflexible, not being able to respond to changes in retail trends. A zoned approach whereby



emphasis could be placed on encouraging specific town centre uses, may allow more flexibility for the town centre to respond and react positively to changing retail demands.

However, it should be noted that the London Plan specifies that Boroughs should include policies in their UDPs which designate core areas primarily for shopping uses and secondary shopping frontages.

RETAIL AND TOWN CENTRE STATUS



LTC9: HOW SHOULD THE TOWN CENTRE'S POTENTIAL FOR A MORE VIBRANT EVENING ECONOMY BE MANAGED?

WHAT IS THE ISSUE?

It is considered that there may be scope for the improvement and development of Lewisham evening economy. whilst there are several pubs located across the town centre, it is felt that it may be appropriate to devise a more co-ordinated approach. The London Borough of Lewisham has become the Licensing Authority under the Licensing Act 2003, which provides major opportunities for the proactive management and development of the evening economy.

WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THIS ISSUE?

PPS6 defines a strong context for delivering a sustainable evening economy, which represents a key issue for Lewisham town centre. The current UDP lacks flexibility and is out-of-date in light of recent changes to the Use Classes Order and Licensing Act. Central to the creation of a successful evening economy is the avoidance of a conflict between uses. In broad terms, there are two potential approaches to the evening economy: Either a generic Borough-wide approach giving criteria for change of use, or a more geographical approach, setting out qualitative/quantitative guidance for geographical zones.

OPTIONS

- LTC9A** Do not provide a specific town centre policy approach.
- LTC9B** Maintain existing core and non-core frontage approach.
- LTC9C** Encourage evening economy uses as part of a mix of uses in specified locations
- LTC9D** Concentrate evening economy uses in a particular zone.

CONSIDERATIONS AND IMPLICATIONS

The town centre is a natural focus for the evening economy, which could become a source of conflict within the town centre if it is not managed correctly. Careful management of a mix of uses would give the Council a tool to promote and manage the evening economy within an overall strategic approach to the town centre. It should be noted that the concentration of uses in a particular zone might be problematic and unsustainable.

RETAIL AND TOWN CENTRE STATUS



LTCI0: SHOULD THE TOWN CENTRE BOUNDARY BE ALTERED?

WHAT IS THE ISSUE?

The AAP provides an opportunity to review the Lewisham town centre boundary. The town centre is currently defined quite broadly and includes areas which are relatively peripheral to the core town centre such as Ladywell.

WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THE ISSUE?

PPS 6 states that the town centre should be a defined area, marked on the proposals map, which includes the primary shopping area and areas of predominantly leisure, business and other main town centre uses within or adjacent to the primary shopping area. These main town centre uses should include; retail (including warehouses and factory outlet centres), leisure and entertainment uses and the more intensive sporting facilities, offices, arts, cultural and tourism uses and housing as part of mixed use development.

The UDP currently defines the town centre boundary which to the west is defined by the railway line west of Sundermead. The northern boundary includes the Thurston Road and Conington Road areas. To the west the boundary extends along Lee High Road and Ladywell is included in the boundary to the south.

OPTIONS

LTCI0A Maintain existing town centre boundary.

LTCI0B Review town centre boundary to achieve a tighter core by removing one or more of the following options (see Fig 3 on p 28).

LTCI0Bi) **North-west corner of the town centre west of the DLR and north of the railway** The area around Armoury Road is former industrial land that was comprehensively redeveloped for housing in the 1980s. The area benefits from very good levels of public transport accessibility, being within walking distance (via a railway arch opposite Jerrard Street) to Lewisham mainline and DLR stations and the numerous associated bus routes and Elverson Road DLR station.

LTCI0Bii) **Conington Road area east of the DLR and north of the railway** This mixed area is occupied by a large Tesco store and associated decked and surface car park, some industrial units on the east side of Conington Road and established residential housing blocks to the west. The area benefits from very good levels of public transport accessibility, being within walking distance to Lewisham mainline and DLR stations and the numerous associated bus routes and Elverson Road DLR station.

LTCI0Biii) **Area around Caterham and Boyne Roads, south of railway and north of Lee High Road** This established residential area is immediately to the east of the new divisional police station and to the north of the secondary shopping facilities along Lee High Road. The area falls partly within the Blackheath Conservation Area.

LTCI0Biv) **Limes Grove area** – This established residential area lies on the immediate eastern side of Lewisham High Street north of the railway line.



LTC10Bv)

Southern end of the High Street south of the railway, towards Ladywell The character and feel of the town centre changes south of the railway as one approaches Ladywell. This is a mixed part of town with the High Street presenting a range of secondary retail services together with the Ladywell Leisure Centre to the south. A large Council depot occupies land immediately to the south of the converging railway lines. The depot is accessed through an area of established and mixed Edwardian housing. At the southern extreme of the town centre is the St. Mary's Centre.

LTC10Biv)

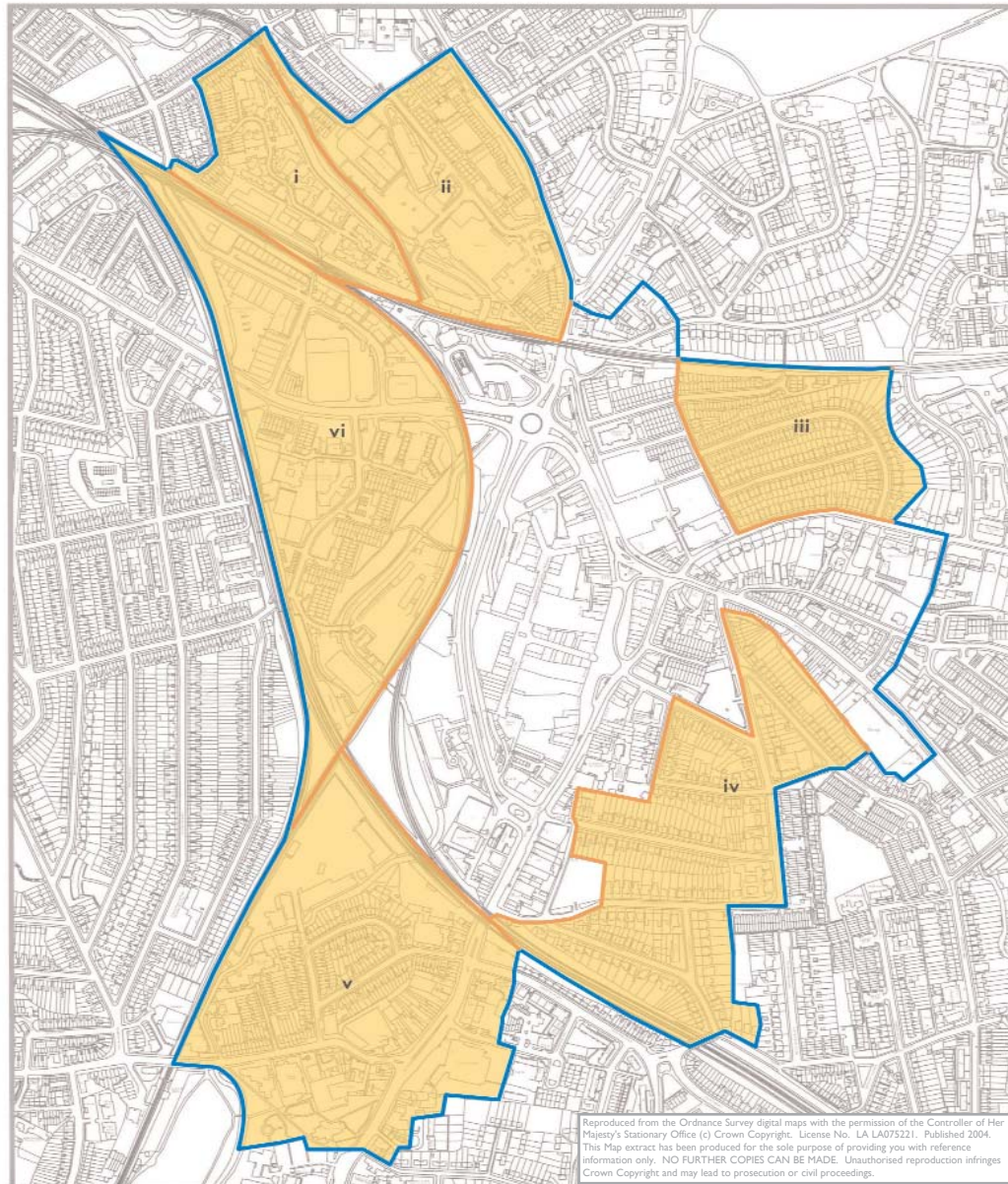
Jerrard Street, Loampit Vale and Elmira Street area – this is a large and varied area with a wide range of land uses. Large scale retail warehousing units dominate the north side of Loampit Vale together with some small scale employment uses. The Sundermead housing estate is undergoing a phased comprehensive redevelopment on the south of Loampit Vale where Lewisham Bridge Primary School is also located. Generally the area is well located to benefit from the good levels of public transport accessibility provided by Lewisham station.

CONSIDERATIONS AND IMPLICATIONS

The town centre comprises a series of relatively distinct character zones. As such it would be possible to review the extent of the boundary on a logical geographical basis. However, there is a sense that these areas are interdependent, and comprehensive regeneration in the core of the existing town centre could have a significant impact on the less central locations. It is important that locations such as Lee High Road and Ladywell are carefully managed and maintained. A reduction in town centre boundary could also have implications for the total retail floorspace in the centre and the aspiration to achieve Metropolitan status.



Figure 3: Lewisham Town Centre Boundary with options for change.



- Existing town centre boundary
- Areas which could be removed to achieve a tighter core



3. URBAN DESIGN

Issues and scope of AAP

It is acknowledged that good design is essential to the success of town centre environments, however, urban design policies and criteria will be covered to a large extent by the Spatial (Core) Strategy and Development Control Policies in the LDF. The design quality of new development and the quality of the public realm is imperative not only to the town centre but to the borough as a whole.

Policy URB1 and URB3 in the UDP are the generic borough wide urban design policies. The Council wishes a high standard of design and townscape quality to be achieved on all development sites across the borough. URB3 sets out a range of criteria against which development is judged.

A review of urban design objectives and baseline trends has identified one specific issue of potential relevance to Lewisham town centre.

LTCII:

What approach should be taken to the location and design of tall buildings in Lewisham town centre?

As the Borough's main town centre, Lewisham is clearly the most appropriate

location in the Borough for tall buildings. How tall buildings should be controlled is therefore considered an issue for the AAP.

Other Issues

Other urban design issues may be relevant to the town centre, although tall buildings were considered the only issue specifically relevant to Lewisham town centre. The AAP will be a comprehensive policy document for the town centre which will replace the policies relevant to the town in the current UDP. It is therefore considered worth reviewing the scope of the urban design policy contained in the UDP set out in Chapter 2 of the UDP. It is envisaged that many areas of policy will not change significantly, however existing policies which may be relevant to Lewisham town centre, but which are not considered necessary to represent key issues, seek to achieve the following:

Designing out crime. All development should incorporate measures to enhance personal security and safety.

Access to buildings for people with disabilities. Public buildings used for employment and education purposes should provide suitable access for people with disabilities, in accordance with DDA requirements.

Adverts, signs and hoardings. The Council will resist the erection of adverts, signs and hoardings out of scale and

character with a building or site on which they are displayed.

Landscape. Applications for development should, where possible, include landscape proposals for areas not occupied by buildings.

The key issue relevant to Lewisham town centre is considered in the following section, together with options for how the issue might be addressed. We would welcome your comments on these issues and options. If you would like to raise additional urban design issues and options, please take this opportunity to do so.

LTCI 1: WHAT APPROACH SHOULD BE TAKEN TO THE LOCATION AND DESIGN OF TALL BUILDINGS?

WHAT IS THE ISSUE?

Whilst the existing UDP states that tall buildings are not generally in keeping with the established scale and character of Lewisham Borough, existing policy recognises that tall buildings may be appropriate in Lewisham and Catford town centres. With development densities of all land uses generally on the increase, should a specific alternative policy approach be taken in Lewisham town centre?

WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THIS ISSUE?

Policy 4B.8 in the London Plan states that the Mayor will promote the development of tall buildings where they create attractive landmarks and enhance London's character. Boroughs should not impose unsubstantiated borough-wide height restrictions but may identify defined areas of specific character that could be sensitive to tall buildings.

The existing UDP policy relating to tall buildings states that applications for tall buildings will only be considered in Catford and Lewisham Town Centres and will require a development brief to identify the site as suitable.

OPTIONS

- LTCI 1A** Retain existing approach whereby tall buildings are considered appropriate in Lewisham town centre if the site is covered by a development brief identifying it as such.
- LTCI 1B** Seek to generally encourage tall buildings in the town centre, removing the requirement for development brief endorsement.
- LTCI 1C** Seek to concentrate tall buildings in a specific location(s).
- LTCI 1D** Set out criteria against which all developments for tall buildings will be considered, including the requirement to demonstrate the highest quality architecture.

CONSIDERATIONS AND IMPLICATIONS

Citibank Tower is currently the most prominent tall building in Lewisham Town Centre. However, in light of the need to make the best use of land, proposals for tall buildings are likely to come forward with greater frequency. Tall buildings can be a useful way of achieving high density residential development, however it must be ensured that they of high design quality, take account of their surroundings and do not detract from the character and grain of Lewisham town centre. It is particularly important that the impact on listed buildings and their setting, Conservation Areas and important areas of open space are taken into account.



4. EMPLOYMENT AND BUSINESS

Issues and scope of AAP

The Issues and the Options of the AAP cover a range of employment and business use issues, but not an exhaustive list of topics as defined by the current UDP. Generic policies and criteria will be covered to a large extent by the Spatial (Core) Strategy and Development Control Policies in the LDF. However, a review of employment and business use objectives and baseline trends has identified one specific issue of potential relevance to Lewisham town centre:

LTC12:

What policy approach should be taken to existing established industrial areas and business uses in the town centre?

Other Issues

Other issues may be relevant to the town centre, although the issue above was considered the most important specifically relevant to Lewisham town centre. The AAP will be a complete policy document for the town centre which will replace the policies relevant to the town centre in the current UDP. Existing policies which may be relevant to Lewisham town centre but not considered to represent key issues seek to achieve the following:

The promotion and retention of creative industries. The Council aims to encourage and retain the location of creative industries within the Borough.

Defined Employment Areas. There are two Defined Employment Area designations within Lewisham town centre. The areas are adjoining sites on Molesworth Street and Engate Street.

The key issue relevant to Lewisham town centre is considered in the following section, together with options for how the issue might be addressed. We would welcome your comments on these issues and options. If you would like to raise additional employment and business use issues and options, please take this opportunity to do so.

LTC12: WHAT POLICY APPROACH SHOULD BE TAKEN TO EXISTING ESTABLISHED INDUSTRIAL AREAS IN THE TOWN CENTRE?

WHAT IS THE ISSUE?

The existing UDP policy seeks to protect existing employment and business floorspace to ensure that there is sufficient land and premises for employment purposes. Should a specific alternative policy approach be taken in Lewisham town centre?

WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THIS ISSUE?

PPG4 seeks to ensure that sufficient land is protected for employment uses, whilst emphasising that many employment/ business uses can be carried out in close proximity to other uses including residential.

A recent update to PPG3 emphasises the need to make best use of land. The update suggests that Local Planning Authorities should consider favourably planning applications for housing and mixed use developments on land allocated for industrial sites where such land is no longer needed for industrial usage. Whilst not of particular relevance to Lewisham town centre, the spirit of this update may nevertheless be relevant.

The UDP policy relating to mixed use development is in the employment chapter.

OPTIONS

- LTC12A** Seek to retain existing employment uses in Lewisham town centre.
- LTC12B** Seek to release land from specific employment allocations in order to promote redevelopment and seek to make the best use of land through mixed use schemes.
- LTC12C** Seek to protect existing office provision within the town centre and continue to identify Lewisham as the most appropriate location for new office development.
- LTC12D** Seek to encourage the conversion of town centre office accommodation to residential uses.

CONSIDERATIONS AND IMPLICATIONS

The recent review of the UDP removed the employment designation of land north and west of Lewisham station in order to promote and encourage the redevelopment of these areas. The only two remaining areas of designated employment land in the town centre are the adjoining areas on Engate Street and Molesworth street. The sites have historically been favoured for storage and distribution use, however they are both very close to the primary shopping area and it is worth considering whether there might be any advantage in promoting the redevelopment of these two areas.



5. OPEN SPACE

Issues and scope of AAP

The Issues and the Options of the AAP cover a range of open space issues, but not an exhaustive list of topics as defined by the current UDP. Generic policies and criteria will be covered to a large extent by the Spatial (Core) Strategy and Development Control Policies in the LDF. However, a review of open space objectives and baseline trends has identified one issue of specific importance to Lewisham town centre. This issue is:

LTCI3

How should the AAP process seek to address open space provision within Lewisham Town Centre?

Other Issues

Other issues may be relevant to the town centre, although the above was considered to be the most important open space issue specifically relevant to Lewisham town centre. The AAP will be a complete policy document for the town centre which will replace the policies relevant to the town in the current UDP. It is therefore considered worth reviewing the scope of the current open space policy contained in the UDP. Chapter 3 of the UDP sets out the Borough's approach to open space. Existing policies seek to achieve the following:

Preservation of Metropolitan Open Land (MOL) and land close to Metropolitan Open Land. This is not considered to be a key issue as there are no MOL designations within Lewisham town centre.

Nature conservation. The Council seeks to preserve the nature conservation value of all sites in the borough that are proposed to be developed.

Sport and recreation. Planning permission for developments that would result in the loss or damage to outdoor sport and recreation land will not be permitted.

The issue considered most relevant to Lewisham town centre is reviewed in the following section, together with options for how the issue might be addressed. We

would welcome your comments on this issue and options. If you would like to raise additional open space issues and options, please take this opportunity to do so.

LTC13: HOW SHOULD THE AAP PROCESS SEEK TO ADDRESS OPEN SPACE PROVISION WITHIN LEWISHAM TOWN CENTRE?

WHAT IS THE ISSUE?

At present there is a limited amount of open space provision Lewisham town centre. Open space provision within Lewisham presents unique challenges as the opportunity for additional open space is severely restricted. Residential densities in the town centre are currently not particularly high. However, recent and anticipated development proposals such as that for the King of Lee site on Lewisham High Street and the Lewisham Gateway proposal will significantly raise the numbers of dwellings in the central area of the town. This will exert increased pressure on existing open space provision.

WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THIS ISSUE?

PPG17 observes that it is part of the function of the planning system to ensure that through the preparation of development plans adequate land and water resources are allocated for organised sport and informal recreation. It says that local planning authorities should take account of the community's need for recreational space, having regard to current levels of provision and deficiencies and resisting pressures for development of open space which conflicts with the wider public interest. In planning for new open spaces and in assessing planning applications for development, local authorities should seek opportunities to improve the local open space network, to create public open space from vacant land, and to incorporate open space within new development on previously-used land. They should also consider whether use can be made of land which is otherwise unsuitable for development, or procure public use of privately owned land or sports facilities.

The London Plan states that the Mayor will work with strategic partners to realise the value of publicly accessible open space and to protect its many benefits, including those associated with health, sport and recreation. As London becomes more compact and intensive in its built form the value of these open spaces will increase

The Open Space Strategy for Lewisham 2005-2010 states that Lewisham Central Ward, which incorporates Lewisham town centre, currently has 1.60ha area of public open space per 1,000 population, this is below that National Playing Fields Association (NPFA) standard of 2.43 ha per 1,000 population. The strategy provides an overarching review of open space in the borough. It provides an assessment of public open space, its characteristics and designations, as defined in the current hierarchy set out in Lewisham Unitary Development Plan (UDP) and in addition provides an assessment of private open space based upon information made available from site stakeholders. The aims of the strategy are to to protect open space in Lewisham from inappropriate development and to enhance and improve the level of quality of open space in Lewisham.

OPTIONS

- LTC13A** Retain existing open space provision
- LTC13B** Improve the quality of open space provision
- LTC13C** Improve accessibility to existing provision
- LTC13D** Ensure new development provides essential amenity space in high density developments.



OPEN SPACE

CONSIDERATIONS AND IMPLICATIONS

Given the need to make best use of land, the density of new development is generally increasing. This places a greater emphasis on existing open space and can put such spaces under pressure for development. It is considered that the creation of additional open space in the town centre would be difficult to implement as a policy objective. However improvements in the quality and accessibility of existing open space may be possible. The design of new developments should include features such as balconies and green roofs in order to ensure adequate amenity space.



6. TRANSPORT

Issues and scope of AAP

The Issues and Options of the AAP cover a range of transport issues, but not an exhaustive list of topics as defined by the current UDP. Generic policies and criteria will be covered to a large extent by the Spatial (Core) Strategy and Development Control Policies in the LDF. However, a review of transport objectives and baseline trends has identified a number of issues which are of specific importance to Lewisham town centre. These issues are:

LTCI4

Should parking standards for new development be reviewed?

LTCI5

In the context of potential significant growth in retail floorspace in Lewisham town centre, what approach should be taken to the provision of public/ shopper parking spaces in the town centre?

Other Issues

Other issues may be relevant to the town centre, although the above were considered the most important transport issues specifically relevant to Lewisham town centre. The AAP will be a comprehensive policy document for the town centre which will replace the policies relevant to the town in the current UDP. It is therefore considered worth reviewing the scope of the current transport policy contained in the UDP. Existing policies which may be relevant to Lewisham town centre but not considered to represent key issues seek to achieve the following:

Location of development.

Development proposals which generate large volumes of traffic or people must be located close to good public transport facilities and provide road or footpath access to such facilities.

Protection and improvement of public transport . The Council support the provision of public transport and will resist any attempt to reduce the present levels of service within the borough. The Council seek to ensure that all public transport services are responsive to the travel needs of the population of the borough.

Cycling and walking . The UDP commits to the promotion of walking and cycling and other forms of sustainable transport.

Road safety. The Council will take measures to reduce the number of road accidents within the borough.

The issues considered most relevant to Lewisham town centre are considered in the following section, together with options for how these issues might be addressed. We would welcome your comments on these issues and options. If you would like to raise additional transport issues and options, please take this opportunity to do so.

LTCI4: SHOULD PARKING STANDARDS FOR NEW DEVELOPMENT BE REVIEWED?

WHAT IS THE ISSUE?

The council is required to set maximum parking standards for new development in accordance with national and regional guidance. The parking standards set out in the current UDP adhere to London Plan standards with the exception of retail development. The retail parking standards set out in the London Plan prove more stringent than those set out by Lewisham in order to encourage more sustainable methods of travel.

WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THIS ISSUE?

PPG13 (ODPM; 2001) Promotes more sustainable transport choices for people and freight and aims to reduce the need to travel by car. Policies on parking should be co-ordinated with parking controls and should be consistent with national and regional guidance. Parking standards should be set out at a maximum. There should be no minimum standards. National parking standards, as set out in PPG13, relate parking provision to floorspace and set a threshold from and above which the standard applies.

The London Plan (GLA; 2004) Aims to make London an easier city to move around by taking an integrated approach to transport provision and development, making major improvements to public transport and tackling congestion. Managing the level of on site parking provision is seen as a key way to promote more sustainable modes of transport. The London Plan states that there is evidence that car use reduces as public transport provision, as measured by PTAL's, increases. Therefore levels of car parking provision should reduce with increasing PTAL rating.

The Mayor's Transport Strategy (GLA; 2001) promotes sustainable transport modes and aims to increase the capacity, reliability, efficiency, quality and integration of London's transport to provide the world class system that the Capital needs. The Strategy does not set out specific parking standards, however states that parking provision should be restrictive.

OPTIONS

- LTCI4A** Retain existing standards for new development including retail development.
- LTCI4B** Adopt London Plan Standards for new development including retail development.
- LTCI4C** Apply a more stringent approach than the standards set out in the London Plan.

CONSIDERATIONS AND IMPLICATIONS

It could be argued that existing parking standards for new retail development are too generous and do not consider the highly accessible nature of Lewisham town centre. The adoption of stringent car parking standards could potentially encourage increased patronage of public transport and the use of more sustainable modes of travel, however it could also prove damaging to the vitality of Lewisham town centre by making it less attractive to visitors and retailers. The existing parking standards do not consider the highly accessible nature of Lewisham Town Centre.



LTC15: IN THE CONTEXT OF POTENTIAL SIGNIFICANT GROWTH IN RETAIL FLOORSPACE IN LEWISHAM TOWN CENTRE, WHAT APPROACH SHOULD BE TAKEN TO THE PROVISION OF PUBLIC/ SHOPPER PARKING SPACES?

WHAT IS THE ISSUE?

In order to achieve metropolitan status retail floorspace in Lewisham town centre must increase which will potentially exert further pressure on existing public parking provision. Should the existing public parking provision within Lewisham town centre be amended? In the context of Lewisham town centre benefiting from fewer public parking spaces than comparable centres, should efforts be made to provide more spaces to support the towns vitality and viability?

Currently, off street car parking provision in Lewisham town centre is as follows:

Clarendon Rise	125 spaces
Molesworth Square	50 spaces
Rennell Street	40 spaces (provision will be lost as part of Lewisham Gateway development.)
Slaithwaite Road	144 spaces
Longbridge Way	52 spaces (Sat. only)
Riverdale Centre	800 spaces
Total	1212 spaces

In comparison, Bromley has approximately 4,000 off street, publicly available parking spaces and Croydon has approximately 6,500 off street, publicly available parking spaces.

WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THIS ISSUE?

PPG13 (ODPM; 2001) Promotes more sustainable transport choices for people and for freight and aims to reduce the need to travel by car. Reducing the amount of parking in new development is essential, as part of the package of planning and transport measures, to promote sustainable travel choices. The availability of car parking has a major influence on the means of transport people choose for their journeys. A balance must be struck between encouraging new investment in town centres by providing adequate levels of parking and potentially increasing traffic congestion caused by too many cars.

PPS5 (ODPM; 2005) Town centres should be accessible by a range of transport modes. Account should be taken of the local public transport facilities and how frequently they run, when assessing an application.

The London Plan (GLA; 2004) Aims to make London an easier city to move around in by taking an integrated approach to transport provision and development, making major improvements to public transport and tackling congestion. Policy 3C.23 states that boroughs should set out appropriate parking standards for town centres through their local plans and Local Implementation Plans. These standards should help to enhance the attractiveness of town centres and to reduce congestion. Boroughs should take account of the vitality and viability of the town centre, public transport provision and need to reduce travel by car when setting these standards.



TRANSPORT

OPTIONS

LTC15A Rationalise existing provision to encourage the use of public transport.

LTC15B Seek to retain existing levels of public parking.

LTC15C Seek to increase provision of public parking.

CONSIDERATIONS AND IMPLICATIONS

Rationalising existing parking provision allows for higher density development and better use of land. It is hoped that restricting existing parking provision will encourage greater use of public transport. Such a measure could also increase pressure upon public transport capacity and harm retail vitality by making Lewisham town centre less attractive to shopper and retailers.

Increasing public parking provision within the town centre may improve vitality as numbers of shoppers and retailers increase, however the provision of more spaces may simply cause more shoppers choosing to travel to the town centre by private car, potentially leading to congestion. If public parking provision is to be increased a site must be allocated for such purposes which places further pressure on town centre development sites.



7. ENVIRONMENT

Issues and scope of AAP

The Issues and Options of the AAP cover a range of environmental issues, but not an exhaustive list of topics as defined by the current UDP. Generic policies and criteria will be covered to a large extent by the Spatial (Core) Strategy and Development Control Policies in the LDF. However, a review of environmental objectives and baseline trends has identified one issue of specific importance to Lewisham town centre. This issue is:

LTCI6

How can the AAP seek to protect and enhance the environs of the Rivers Quaggy and Ravensbourne?

Other Issues

Other issues may be relevant to the town centre, although the above is considered to be the most important environmental issue specifically relevant to Lewisham Town Centre. The AAP will be a complete policy document for the town centre which will replace the policies relevant to the town in the current UDP. Existing policies which may be relevant to Lewisham town centre but not considered to represent key issues seek to achieve the following:

Waste management. The existing policies on waste aim to protect public health and safety, encourage recycling and protect the environment. All planning decisions about waste management will be taken in accordance with the principles of Best Practicable Environmental Option (BPEO), the Waste Hierarchy, the Proximity Principle and Regional Self Sufficiency.

Air quality. Any development proposed within an Air Quality Management Area (as designated by the Council) will be required to submit an assessment of its likely impact upon air quality.

Flood plains. The council supports the protection of flood plains and will resist any development on them unless it can be demonstrated that the proposal would not itself or cumulatively increase the risk of flooding or reduce the capacity of the flood plain to store flood water.

Drainage and water supply. The UDP commits to the protection of ground or surface water quality and adequate drainage.

Energy and efficiency. The Council will take measures to ensure that developments have regard to the principles of energy and natural resource efficiency.

The issue considered most relevant to Lewisham Town Centre is considered in the following section, together with options for how this issue might be addressed. We would welcome your comments. If you would like to raise additional environmental issues and options, please take this opportunity to do so.

LTCI6: HOW CAN THE AAP SEEK TO PROTECT AND ENHANCE THE ENVIRONS OF THE RIVERS QUAGGY AND RAVENSBOURNE?

WHAT IS THE ISSUE?

The Rivers Quaggy and Ravensbourne flow through the town centre and meet near Lewisham station. They are a significant and under utilised asset of the town and new development may present the opportunity to improve the quality of and accessibility to the river channel and its immediate environs.

WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THIS ISSUE?

PPG9 (ODPM; 1994) reflects the government's commitment to wildlife diversity and sustainable development. Nature conservation can be a significant material consideration in determining many planning applications, however, PPG 9 states that local planning authorities should not refuse permission if development can be subject to conditions or obligations that will prevent damaging impacts on wildlife habitats or important physical features, or if other material factors are sufficient to override nature conservation considerations. Planning obligations can accompany permissions in order to secure long-term management, to provide funds for management, or to provide nature conservation features to compensate for any such features lost when development takes place.

The London Plan (GLA; 2004) rivers are protected in policy 4C.31 of the London plan. Rivers of all sizes should be protected, improved and respected; in particular, measures should be taken to improve the habitat and amenity value of such waterways.

Currently policies within the UDP do not address the protection of the river environment; however protection from pollutants is advocated in policy ENV.PRO 7 Potentially polluting uses.

OPTIONS

LTCI6A. New development should contribute either with physical environmental improvements or financial contributions to fund improvements in order to protect and enhance the river environment in the town centre.

LTCI6B. On the basis that there is no demonstrable harm to the river and its environment contributions should not be sought.

CONSIDERATIONS AND IMPLICATIONS

Contributions from new developments located along the river allow the river environment to be enhanced, policies within the core strategy will ensure that the river environment is protected from demonstrable harm.



ENVIRONMENT

8. COMMUNITY AND LEISURE

Issues and scope of AAP

The Issues and the Options of the AAP cover a range of community and leisure issues, but not an exhaustive list of topics as defined by the current UDP. Generic policies and criteria will be covered to a large extent by the Spatial (Core) Strategy and Development Control Policies in the LDF. However, a review of community and leisure objectives and baseline trends has identified one issue of specific importance to Lewisham town centre. that is the siting of a new secondary school on the site currently occupied by Ladywell Municipal Leisure Facility. As this issue is the subject of a separate consultation process it is not considered appropriate to consult again. However, an update on the current position is provided below.

The site which is currently occupied by Ladywell Leisure Centre has been identified as the most suitable site for the provision of a new and desperately needed secondary school. The contract with the leisure provider at Ladywell Leisure Centre comes to an end in 2006, and there have been discussions with the contractor about the prospect of closure in 2007.

The closure of the Leisure Centre temporarily reduces the amount of leisure provision in the borough. The planned opening of the Downham Lifestyles Centre will be important in maintaining

the number of available pools in the borough. In addition a new development at Sundermead on Loampit Vale will see a state of the art facility in the Town Centre in a far more accessible location.

Other Issues

Other issues may be relevant to the town centre, although the above is considered to be the most important community and leisure issue specifically relevant to Lewisham town centre. The AAP will be a complete policy document for the town centre which will replace the policies relevant to the town in the current UDP. Existing policies which may be relevant to Lewisham town centre but not considered to represent key issues seek to achieve the following:

To ensure adequate provisions of education and community facilities.

The Council and other protective and public authorities have statutory obligations and duties which they must meet in terms of education and community facility provision, in order to meet these responsibilities there must be adequate facilities and such facilities should be located in the appropriate places to provide easy access for users, to allow travel by public transport and to ensure access for all sectors of the community.

To prevent the loss of existing leisure, community, arts, cultural, entertainment, sports, health care, child care and education facilities as a consequence of redevelopment or change of use. Such facilities are of huge value to the community; they contribute to sustainability objectives and can promote economic and social regeneration.

Promote the potential of the Borough for tourism. Encouraging tourism within the borough will have significant regenerative impacts, assisting the local economy and increasing the number and variety of jobs.

We would welcome your comments. If you would like to raise additional community and leisure issues and options, please take this opportunity to do so.

9 IMPLEMENTATION

Issues and scope of AAP

As discussed in section 1.3, AAPs are intended to have a strong focus on implementation and delivery. In addition, government guidance also sets out the importance of monitoring the effectiveness of the AAP. Paragraph 4.48 of PPS12 states that 'Local planning authorities must develop monitoring systems to assess the effectiveness of local development documents'.

As such there are two general issues which will be addressed by the AAP. These are:

- How should the AAP best be implemented?
- How should the Council monitor the AAP?

Chapter 10 of the UDP sets out the Council's current approach to implementation, resources and monitoring. This includes the following aspects:

- Monitoring the efficiency of policies and proposals;
- Seeking all available resources, public and private for the implementation of policies and proposals in the plan;
- Encouraging consideration of community benefit and planning loss;
- Commitment to consultation; and

- Undertaking enforcement action.

The UDP also provides indicators and monitoring targets for a wide range of themes which cover the overall scope of the plan.

Mechanisms for implementation will in general be explained in the Core Strategy. However, there are some Lewisham specific mechanisms which are listed below:

- Specific town centre S106 arrangements;
- CPO powers for regeneration with the town centre;
- Liaison with Town Centre Manager on monitoring and implementation; and
- Adherence to PPS6 recommendations for town centre health check monitoring.

We would welcome your comments on these general options. If you would like to make additional comments, please take this opportunity to do so.

SECTION C SITE OVERVIEW

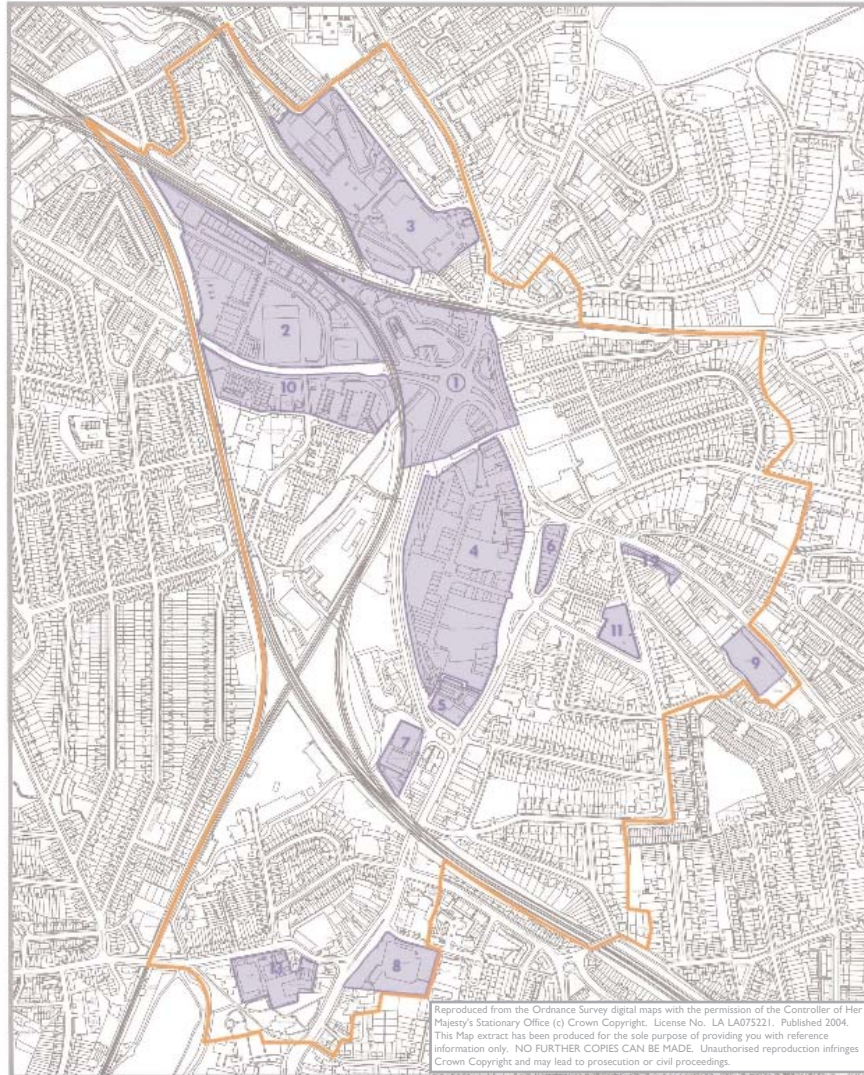


Figure 4: Potential Development Sites within Lewisham Town Centre

Introduction

Government guidance on the production of Development Plan Documents states that allocations for specific land uses should be made in one or more development plan document (para 2.15, PPS12, 2004). Paragraph 2.20 indicates that site specific allocations and proposals should be included on an adopted proposals map. The guidance also makes provision for separate inset maps to show policies for part of the authorities area such as the policies for Area Action Plans. In the case of Lewisham town centre, the town centre will appear as a boundary on the Borough Proposals map with detailed policy appearing in the AAP inset map. It should be noted that the appropriateness of the existing town centre boundary is itself an issue identified within the Retail and Town Centre Status theme above.

Figure 4 does not provide policy detail at this stage. The purpose of the plan is to depict the extent of the sites which are considered to be potential development sites. We are seeking your views on the following:

The appropriateness of including these sites

The accompanying site schedule describes the recent planning history and status of the sites, with the final column providing a brief overview of indicative issues and options.



Possible Development Site	Commentary/ Status	Issues and options
1. Lewisham Gateway	<p>Working within the existing road alignment, two development sites are allocated in the current UDP in this location, highlighting the area as suitable for comprehensive redevelopment to provide a range of commercial uses including retail, a hotel and leisure uses such as a cinema.</p> <p>The site shown in Figure 4 forms the centre-piece of the successful £16m Urban Renaissance in Lewisham SRB bid. Agreement has been reached with Transport for London and London Buses on the principle of replacement of the current roundabout with a new road network. The London Development Agency, working in partnership with Lewisham Council, has appointed AMEC and Taylor Woodrow as development partners to take the scheme forward. Comprehensive redevelopment of the current roundabout site will provide a more direct physical link between the station and the High Street and will enable much improved interchange between public transport modes. An outline planning application is anticipated in 2005/6. It is envisaged that the resultant development will deliver over 10,000sqm of retail floorspace, other associated town centre uses and a significant amount of residential development in the heart of Lewisham town centre.</p>	<p>Comprehensive consultation on various options for the Lewisham Gateway site was undertaken during the early stages of the SRB funded initiative. Following detailed consideration of these options by the SRB Board, a preferred option was chosen. Lewisham Council prepared and adopted a Planning Brief which includes a development framework indicating how the site might come forward based on the preferred option.</p> <p>Given the development context associated with this key site and with the development of the site being supported through the award of SRB funding, it is not considered appropriate to consider options for how the site might be developed. However, it is considered appropriate to identify the site as a development site and it is important, in the preparation of the AAP for Lewisham town centre, to give some consideration to the impact such significant development would have on the town.</p>
2. Thurston Road area	<p>Currently dominated by employment uses and large format retailers, this area is considered to have significant development potential. Located immediately to the west of the station, the area benefits from good levels of public transport accessibility. The area has four main component sites, as follows:</p> <ul style="list-style-type: none"> - The site currently occupied by the Thurston Industrial Estate, bound by Thurston Road, Jerrard Street, Loampit Vale and the railway embankment, is in one freehold ownership and benefits from 	<p>In terms of issues and options, the Thurston Road area is not designated as a Defined Employment Site in the UDP. The land use is generally fairly low density, with many single storey buildings and areas of surface car parking. The issue is how to make best use of the sites in the context of seeking to promote the vitality and viability of the centre as a whole.</p> <p>Potential options for the site therefore include:</p> <p>Retail uses - the area currently represents</p>



Possible Development Site	Commentary / Status	Issues and Options
	<p>outline planning permission for a retail warehouse of 4,182 m2;</p> <ul style="list-style-type: none"> - The site currently occupied by MFI and Matalan is in one freehold ownership. - The Allied Carpets site is owner occupied and holds a key strategic location adjacent to the Lewisham Gateway area. - Land to the rear of this site between Thurston Road and the railway embankment is currently occupied by travellers, however the site is not considered suitable for this use either by the travelling community or the Council. A range of employment uses also occupy the site. 	<p>Lewisham's largest concentration of large format retail stores and the Retail Capacity Assessment identifies this location as being suitable for greater amounts of large-scale retail uses.</p> <p>Employment - in seeking to accommodate large scale retail uses, single aspect edges to these uses may present the opportunity to accommodate small business uses. In addition, land close to railway embankments might also be well suited to employment uses.</p> <p>Housing - given the proximity of Lewisham station, residential uses might be considered appropriate in the mix of uses suitable for this area.</p>
<p>3. Conington Road area</p>	<p>The Conington Road area of Lewisham town centre contains a cluster of sites including the site of the existing Tesco car park, the Venson site on which Bellway Homes have recently received planning permission for a residentially led mixed use scheme and the Gilmex and Blakey sites which are currently occupied by business/employment uses. The area is traversed by the River Ravensbourne. Located to the north of the station area, Conington Road would benefit from improved links to the town centre.</p>	<p>Given its proximity to the station, the area is considered to have significant development potential. With borders onto established residential communities, the issue is to consider what mix of uses would be appropriate in this location which is geographically close to but physically separate from the town centre.</p> <p>Potential options for the site therefore include:</p> <ul style="list-style-type: none"> - Taking a facilitative stance on retail floorspace in this location in addition to that already provided on the Tesco site; - Employment uses currently occupy some of the sites and it may be appropriate to seek to ensure that these uses remain in this location; - The area might be considered as suitable for the establishment of a new high density, primarily residential, development with good links to the station and the town centre.



Possible Development Site	Commentary/ Status	Issues and Options
<p>4. Lewisham Centre</p>	<p>The Riverdale Centre has recently been purchased by Land Securities who are reviewing their aspirations for the shopping centre. The owners are considering a proposal to build a new department store as an extension to the existing centre instigated by the previous owners.</p> <p>The centre occupies an entire and very large urban block which currently forms the heart of the town centre. Whilst retail development provides active frontage to Lewisham High Street forming the eastern boundary of the centre, Molesworth Street to the west suffers from large expanses of blank walls and little in the way of active frontage.</p> <p>The centre represents a major barrier to east-west movement across the town centre.</p>	<p>The shopping centre has a key role in the town centre with respect to the issue of retail and town centre status. Recent change in ownership and the proposals for Lewisham Gateway immediately to the north suggest that options for the future of the centre should be considered.</p> <p>Potential options for the site therefore include:</p> <ul style="list-style-type: none"> - Maintaining the existing centre whilst supporting its continued retail function in the town centre; or - Redevelopment of the centre in whole or in part to better integrate it to its immediate context, particularly Molesworth Street to the west.
<p>5. Model Market and Former Beatties Site</p>	<p>The Model Market and former Beatties site form part of a cluster of opportunities at the southern end of the High Street. The Beatties building has a historic role for the town centre, being the former site of a picture theatre and cinema during the first half of the twentieth century. The Bridgehouse Estate Trust (Corporation of London) owns the freehold to 208/212 Lewisham High Street which is currently subject to a long leasehold to a third party.</p> <p>The Model Market provides a range of independent market traders with the opportunity of a selling pitch very close to the prime shopping area of Lewisham High Street.</p>	<p>A key issue for the AAP is to ensure that the town centre is a viable destination. Options relating to this issue, which might be applicable to the Model Market site include mixed use development, allocation of sites for retail uses or development of marker buildings at key sites on the High Street. These sites have significant potential for joint and comprehensive redevelopment to help anchor the southern end of the shopping centre. Occupying an extremely prominent site when viewed from the south, the site is considered, from a townscape perspective, to provide an opportunity to make a contribution to the town centre</p>



Possible Development Site	Commentary / Status	Issues and Options
6. Lewis Grove island site	<p>Lewis Grove island site is situated at the northern end of the High Street. The site is in fragmented ownership but forms an important easterly frontage to the northern part of Lewisham High Street.</p> <p>Some of the existing buildings on the site, particularly those on the northern edge, are considered to be of good townscape value.</p>	<p>There is potential for the redevelopment of the northern portion of the Lewis Grove Island, which could respond to issues such as:</p> <ul style="list-style-type: none"> - town centre status (i.e. potential to accommodate a range of town centre uses and evening economy uses) - the need for high quality design and improvements to townscape within the town centre. <p>The site is considered to be a longer term development opportunity, but phased and/or partial redevelopment may bring significant benefits to the town centre in the shorter term.</p> <p>There are a number of business related uses on the site together with retail and service uses. Redevelopment of the site may provide the opportunity to incorporate residential uses into the very heart of the centre.</p>
7. Engate Street	<p>Engate Street forms part of a cluster of sites at the southern end of the High Street along with the Model Market (site 5). 30-34 Engate Street is owned by the Bridgehouse Estate Trust (Corporation of London) and is currently subject to leaseholds of varying timescales to a series of third parties. Generally the sites are in employment use and used for storage and distribution. There are currently no known proposals coming forward for Engate Street.</p>	<p>As noted in the commentary for site 5, a key issue is town centre vitality and viability. Options which might be applicable for this site include a shift towards a greater mix of uses.</p> <p>The site benefits from direct access to Molesworth Street which allows good vehicular accessibility. The main shopping area is also in very close proximity, although it is considered that Molesworth Street presents something of a barrier to pedestrian movements in the area.</p> <p>Options for the redevelopment of this site could include:</p> <ul style="list-style-type: none"> - Retention of employment uses in the town centre - Introduction of larger scale retail uses immediately adjacent to the primary shopping area - A town centre car park which benefits from direct access to the Transport for London Road Network



Possible Development Site	Commentary/ Status	Issues and Options
8. Ladywell Leisure Centre site	<p>The Ladywell Leisure Centre site is the preferred location for a new secondary school. After consultation in 2002 Ladywell emerged as the only option identified which would enable a permanent site to be opened within a reasonable timescale. The contract with the current leisure provider is set to end in 2006 and closure of the centre in 2007 is likely.</p>	<p>The site has been earmarked for a new secondary school by the Council, however the closure of the leisure centre (which is likely in 2007) will temporarily reduce the amount of leisure provision in the borough while proposals for a new leisure centre on the southern side of Loampit Vale are developed.</p>
9. Lee High Road	<p>The western end of Lee High Road is developing into a focus for specialist retail and evening economy uses and is defined by its diverse range of independent traders. The east end of Lee High Road is dominated by the former Hartnell Ford site which is an important development opportunity. The site is owned by Lidl and benefits from outline consent for food retail uses. Lidl are seeking detailed planning permission for the development of a supermarket on this site.</p> <p>With the site being at the edge of the town centre, it is well located to serve the established residential communities on the eastern side of the Borough.</p> <p>The Lidl-owned site is currently allocated for retail or retail and housing in the recently adopted UDP.</p>	<p>The issue for the development of Lee High Road is how to ensure that the best use is made this readily available development opportunity.</p> <p>The key issue regarding the future of this site relates to the uses provided in any redevelopment. Options would include retail only on this edge of centre site, or a mix of uses including a significant amount of residential development</p>



Possible Development Site	Commentary / Status	Issues and Options
10. Loampit Vale south	<p>The area to the south of Loampit Vale represents a major opportunity for the town centre, particularly in light of the structural changes which could result from the Gateway development. The London and Quadrant Sundermead redevelopment is a key step in delivering a new environment and for the town centre residential community. Importantly, a new public open space is being provided as part of the Sundermead redevelopment.</p> <p>There are two parcels of land to the south of Loampit Vale, land to the east and west of Elmira Street.</p>	<p>Given the issue relating to increasing the status of the town centre and the close proximity of Loampit Vale to the transport interchange, options include support for greater activity on Loampit Vale frontage and a shift towards a mix of uses incorporating a range of town centre functions and a more intensive use of space.</p> <p>The site nearest the town centre and immediately opposite the gateway is currently being considered as a suitable location for a replacement municipal swimming pool</p>
11. Albion Way car park	<p>The Albion Way car park is situated to the east of the High Street in the Clarendon Rise area which is defined by a more residential character. There are currently no plans or development interest in this site.</p>	<p>In order to address issues of environmental improvements and open space provision, and to respond to the possibility of a greater density of population in the town centre, it might be appropriate to support the creation of a new open space on the site of the existing car park, subject to re-provision of car parking spaces elsewhere in the town centre.</p>
12. Lee High Road west	<p>Heavily constrained by the alignment of the River Quaggy to the rear, this thin strip of land is currently occupied by a single storey terrace of retail units. The site is in a prominent position very close to Lewisham High Street and is therefore considered to be a development opportunity.</p>	<p>As an established part of the retail centre of the town, the ground floor should be retained in retail/commercial use but there is significant scope for additional storeys of office or residential development above. The impact on the River Quaggy will be an issue and measures to protect and improve the channel will need to be agreed with the Environment Agency. The close proximity of the properties along Clarendon Rise and Gilmore Road will also be an issue in any redevelopment proposal.</p>



Possible Development Site	Commentary / Status	Issues and Options
13. Former Police Station	<p>The area around the site of the former Police Station on Ladywell Road benefits from some good quality historic buildings which contribute positively to the character of this area, which is protected by the Ladywell Conservation Area. With the completion of the new divisional police headquarters on Lewisham High Street this Victorian police station is no longer required for police operations and is the subject of developer interest. The site incorporates a number of existing buildings including the Grade II listed Coroner's Court and Police Station as well as the Ladywell Playtower building, which, although not listed, is a local landmark and is considered to enhance the Conservation Area.</p>	<p>This is a fine grain and mixed use area of considerable townscape value. Protection of the various Listed Buildings on the site together with consideration of their setting will be a key issue in the consideration of development proposals. The preservation and enhancement of the character of the Ladywell Conservation Area will also be a primary consideration. Redevelopment options should retain the listed buildings and take imaginative and creative steps to ensure they are brought back into use where possible.</p>



D. INITIAL SUSTAINABILITY APPRAISAL

6. Initial Sustainability Appraisal

The new planning system is underpinned by the concept of sustainability which is incorporated at the local planning policy scale through the mechanism of sustainability appraisal (SA). Paragraph 3.17 of PPS12 states, "the purpose of sustainability appraisal is to appraise the social, environmental and economic effects of the strategies and policies in a local development document from the outset of the process".

As noted in section 1.5, the first stage of the AAP process was to produce a Sustainability Scoping Report which was undertaken in May 2005. The Scoping Report sets a context for the

Sustainability Appraisal process, defining a Sustainability Appraisal Framework including sustainability objectives and indicators. The process of SA parallels the plan-making process which is being undertaken for the AAP. As such, an Initial Sustainability Appraisal has been incorporated in the issues and options report. This is presented in the form of a commentary on options, highlighting potential conflict or issues and opportunities to strengthen the delivery of sustainability objectives.

The transparent process of utilising the scoping report and previous consultation to generate issues has been examined in section 4.

HOUSING		
LTC1: THE BOROUGH HAS A TARGET OF 17,350 ADDITIONAL DWELLINGS (TO 2016). HOW CAN HOUSING NEED BEST BE MET IN THE TOWN CENTRE?		
LTC1A	Have policies seeking to increase the density of residential uses (see also Issue HSG3).	Increasing density through the redevelopment or conversion of existing sites (Option B) would help to reduce pressure on open space or on sites that may have ecological value.
LTC1B	Have policies encouraging the redevelopment or conversion of existing sites with residential as part of a mix (e.g. employment/retail ground floor with residential above).	Increasing the amount of dwellings could contribute towards Sustainability Objectives Soc1 (provision of high quality affordable homes) if there is a policy approach to delivering a proportion of affordable homes - as proposed below.
LTC1C	Promote new development in the town centre including residential uses as part of a mix of uses. This could be achieved by the allocation of specific additional sites in the town centre to include some residential development.	If all housing developments (through either Option A, B or C) are close to public transport this would contribute towards meeting Sustainability Objective Env2 (to reduce dependency on private cars). Conversion of existing buildings (Option B) could contribute towards Sustainability Objective Soc2 (To increase the provision of housing that meets decent homes standards) where the new housing replaces poor quality existing housing.



LTC2: BOROUGH REQUIRES 7,250 TO 12,950 AFFORDABLE DWELLINGS FROM 2000 TO 2008 TO MEET FUTURE HOUSING NEED. SHOULD THERE BE A SPECIFIC TOWN CENTRE AFFORDABLE HOUSING POLICY?		
LTC2A	No specific affordable housing policy required for Lewisham town centre, borough wide affordable housing policy should be adhered to.	Delivering a higher proportion of affordable housing (Option C) would meet Sustainability Objective Soc1 (increase the provision of high quality affordable homes with good connectivity to public transport) providing that the homes are of high quality and close to public transport nodes.
LTC2B	A policy which takes a more flexible approach to the provision of affordable housing in Lewisham town centre in terms of size, tenure, location and quantity of provision. This may result in delivery of fewer affordable homes than option LTC2A.	
LTC2C	A policy approach which seeks to deliver a higher proportion of affordable housing in Lewisham town centre. This may result in the delivery of more affordable homes than option LTC2A.	
LCT3: HOW BEST CAN THE AAP PROMOTE HIGHER RESIDENTIAL DENSITIES IN AREAS OF HIGH PUBLIC TRANSPORT ACCESSIBILITY?		
LTC3A	Retain existing Sustainable Living Area approach.	Promotion of car-free housing (Option B) for developments near public transport nodes would support Sustainability Objective Soc1 (increase the provision of high quality affordable homes with good connectivity to public transport). Removal of right to street parking permits (Option C) could contribute to Sustainability Objective Env2, although there may be negative effects (e.g. illegal parking and congestion).
LTC3B	Promote car-free housing.	
LTC3C	Removal of right to a street parking permit for occupiers of new residential developments.	
LCT4: HOW SHOULD THE AAP MAKE PROVISION FOR THE TRAVELLER COMMUNITY?		
LTC4A	Identify and allocate a traveller site within Lewisham town centre.	This issue is not addressed by the sustainability objectives.
LTC4B	Identify and allocate a traveller site outside Lewisham Town Centre.	
LTC4C	Include a criteria-based policy in order to provide a framework to assess the suitability of new proposals.	



RETAIL AND TOWN CENTRE STATUS

LTC5: HOW CAN LEWISHAM TOWN CENTRE BEST MOVE TOWARDS METROPOLITAN CENTRE STATUS?

LTC5A	Rely on existing site allocations for new retail developments in the town and determine applications for additional retail developments on their merits.	<p>Both Option A and B would address Sustainability Objective Eco1 (To increase the diversity of the retail offer), providing that this will increase the diversity of the retail offer.</p> <p>Allocation of sites according to the retail capacity study would provide a more planned and predictable approach and may make it easier to consider the other impacts associated with the development. Other impacts would include: road safety (Soc10), sustainable transport (Env2), access to local employment (Eco4).</p>
LTCB	Allocate new sites for retail development with regard to the retail capacity study in order to plan for and accommodate identified retail capacity to help the town centre move toward the floorspace required to meet metropolitan status (100,000m2).	

LTC6: HOW CAN LEWISHAM TOWN CENTRE'S VITALITY AND VIABILITY BEST BE SUPPORTED?

LTC6A	Public realm enhancements.	<p>Supporting a greater mix of uses (Option C) would contribute towards Sustainability Objective Eco2 (To encourage a vibrant, well-managed evening economy) and Eco1 (To increase the diversity of the retail offer).</p> <p>Making Lewisham a safer place (Option D) would contribute towards Sustainability Objective Soc7 (To reduce crime levels in the town).</p> <p>Allocating new sites for retail development (Option F) could contribute towards Sustainability Objective Eco2 (To increase the diversity of the retail offer).</p> <p>Encouraging a greater mix of uses, including residential development would contribute towards Sustainability Objective Soc1 (To increase the provision of high quality affordable homes with good connectivity to public transport).</p>
LTC6B	Encourage new development on the Lewisham Gateway site to raise the profile of the town centre as a whole.	
LTC6C	Support a greater mix of uses including cafes, bars and other evening economy uses to support vitality of retail offer.	
LTC6D	Make Lewisham a safer place.	
LTC6E	Support shop front improvements and funding programmes.	
LTC6F	Allocate new sites for retail development.	
LTC6G	Encourage a greater mix of uses within the town centre including residential development.	
LTC6H	Re-development at key locations within the High Street to provide marker buildings with a mix of uses.	



LTC7: IF IMPLEMENTED, LEWISHAM GATEWAY HAS THE POTENTIAL TO BRING WIDE RANGING BENEFITS TO THE TOWN CENTRE. HOW SHOULD THE AAP ADDRESS THE ISSUES ASSOCIATED WITH LEWISHAM GATEWAY?

LTC7A	Allocate the Lewisham Gateway site for high density mixed-use development.	<p>High density mixed use development (Option A) could include affordable homes, community facilities, retail and evening economy sites. This type of mixed use would support Sustainability Objectives:</p> <ul style="list-style-type: none"> - Soc1 (To increase the provision of high quality affordable homes with good connectivity to public transport); - Soc4 (To increase the provision of accessible and inclusive everyday facilities); - Eco1 (To increase the diversity of the retail offer) providing that this will increase the diversity of the retail offer; - and Eco2 (To encourage a vibrant, well-managed evening economy). <p>However, it is not clear what mixed use development is proposed for Option A.</p> <p>Using the southern part of the High Street as a prime focus for community activity (Option D) would support several Sustainability Objectives:</p> <ul style="list-style-type: none"> - Soc4 (To increase the provision of accessible and inclusive everyday facilities); - Soc9 (To improve access to amenities for vulnerable members of the community); - and potentially Soc8 (To increase access to lifelong learning) through the library.
LTC7B	Rely on existing development site allocation in the UDP to facilitate redevelopment of the roundabout site.	
LTC7C	Identify and allocate sites in the southern part of the centre for the redevelopment in order to seek to address the change in the centre of gravity that is likely to result from the Lewisham Gateway development.	
LTC7D	Consider whether the southern part of the High Street and shopping centre could develop a new role to complement the prime retail as a focus for community activity. This role might be a focus for community activity, with the library representing an obvious stimulus for this type of activity. An alternative focus could be a focus on evening economy uses.	

LTC8: WHAT APPROACH SHOULD THE AAP TAKE TO THE DESIGNATION OF CORE AND NON-CORE SHOPPING FRONTAGES?

LTC8A	Maintain current distinction between core and non-core frontages as currently shown on the proposals map.	<p>Integrating a more diverse mix of uses including the evening economy (Option C) could support Sustainability Objectives Eco1 (To increase the diversity of the retail offer) and Eco2 (To encourage a vibrant, well-managed evening economy).</p>
LTC8B	Review existing allocation of core and non-core frontages.	
LTC8C	Introduce a geographical basis for designating retail zones with greater scope for integrating a more diverse mix of uses including evening economy.	
LTC8D	Remove shopping frontage designations and rely on town centre boundary.	



LTC9: HOW SHOULD THE TOWN CENTRE'S POTENTIAL FOR A MORE VIBRANT EVENING ECONOMY BE MANAGED?		
LTC9A	Do not provide a specific town centre policy approach.	Options B, C and D all contribute to sustainability objective Eco 2 (to encourage a vibrant, well-managed evening economy). The policy would have to consider how to ensure that the evening economy is well-managed.
LTC9	Maintain existing core and non-core frontage approach.	
LTC9C	Encourage evening economy uses as part of a mix of uses in specified locations.	
LTC9D	Concentrate evening economy uses in a particular zone.	
LTC10: SHOULD THE TOWN CENTRE BOUNDARY BE ALTERED?		
LTC10A	Maintain existing designation.	<p>Removing one or more of the options i-iv (Option B) would potentially limit the opportunities to provide affordable homes, community facilities, retail offer, employment opportunities, density of local business and access to local employment. This would have a negative contribution to Sustainability Objectives: Soc1 (To increase the provision of high quality affordable homes with good connectivity to public transport); Soc4 (To increase the provision of accessible and inclusive everyday facilities); Eco1 (To increase the diversity of the retail offer); or Eco2 (To encourage a vibrant, well-managed evening economy).</p> <p>Option i - North-west corner of the town centre and Option ii - Conington Road area both benefit from very good levels of public transport accessibility and, therefore, developments on this site would support Env2 (To reduce dependency on private cars).</p>
LTC10B	Review town centre boundary to achieve a tighter core by removing one or more of options (i)-(vi) on page 28.	



URBAN DESIGN

LTC11: WHAT APPROACH SHOULD BE TAKEN TO THE LOCATION AND DESIGN OF TALL BUILDINGS?

LTC11A	Retain existing approach whereby tall buildings are considered appropriate in Lewisham town centre if the site is covered by a development brief identifying it as such.	Setting out criteria against which all developments for tall buildings will be considered (Option D) would help to set standards for tall buildings to ensure they contribute towards sustainability. In particular, it could specify that tall buildings: - are located close to transport hubs and so supporting Sustainability Objectives Env2 (To reduce dependency on private cars.) - consider carbon emissions from these buildings and so support Sustainability Objective Env3 (To increase on-site renewable energy provision). - consider management of waste and recycling and so support Sustainability Objective Env5 (To increase the amount of waste recycling).
LTC11B	Seek generally to encourage tall buildings in the town centre, removing the requirement for development brief endorsement.	
LTC11C	Seek to concentrate tall buildings in a specific location(s).	
LTC11D	Set out criteria against which all developments for tall buildings will be considered, including the requirement to demonstrate the highest quality architecture.	

EMPLOYMENT AND BUSINESS ISSUES

LTC12: WHAT POLICY APPROACH SHOULD BE TAKEN TO EXISTING ESTABLISHED INDUSTRIAL AREAS IN THE TOWN CENTRE?

LTC12A	Seek to retain existing employment generating uses in the town centre.	Retaining existing employment generating uses (Option A) is not sufficient for Sustainability Objective Eco4 (To increase access to local employment). Releasing land from specific employment allocations (Option B) could have a negative contribution towards Sustainability Objective Eco4 (To increase access to local employment), depending on the type of mixed use schemes proposed. Promoting new office development (Option C) may contribute to Sustainability Objective Eco4, if this development allowed access to employment. Conversion of town centre office accommodation to residential uses (Option D) could contribute to Sustainability Objective Soc1 (To increase the provision of high quality affordable homes with good connectivity to public transport), but would contribute negatively to Sustainability Objectives Eco4.
LTC12B	Seek to release land from specific employment allocations in order to promote redevelopment and seek to make the best use of land through mixed use schemes.	
LTC12C	Seek to protect existing office provision within the town centre and continue to identify Lewisham as the most appropriate location for new office development.	
LTC12D	Seek to encourage the conversion of town centre office accommodation to residential uses.	



OPEN SPACE		
LTCI3: HOW SHOULD THE AAP SEEK TO ADDRESS OPEN SPACE PROVISION WITHIN LEWISHAM TOWN CENTRE?		
LTCI3A	Retain existing open space provision.	<p>Ensuring new development provides amenity space would contribute towards Sustainability Objective Soc13 (To increase the quality and provision of publicly accessible open spaces).</p> <p>The other options (A, B and D) would not contribute towards this objective as they either threaten or do not increase open space provision.</p> <p>Improve accessibility to existing provision could contribute towards Sustainability Objective Soc3 (To increase recreational access to the Quaggy and Ravensbourne rivers) if this is related to the river environment.</p>
LTCI3B	Improve the quality of open space provision.	
LTCI3C	Improve accessibility to existing provision.	
LTCI3D	Ensure new development provides essential amenity space in high density developments.	
TRANSPORT		
LTCI4: SHOULD PARKING STANDARDS FOR NEW DEVELOPMENTS BE REVIEWED?		
LTCI4A	Retain existing standards for new development.	<p>Reducing parking standards (Options B and C) would contribute towards Sustainability Objective Env2 (To reduce dependency on private cars) and potentially Soc 10 (To improve pedestrian safety in the town centre) and Soc12 (To reduce noise from road traffic, construction and industry).</p>
LTCI4B	Adopt London Plan Standards.	
LTCI4C	Apply a more stringent approach than that standards set out in the London Plan.	
LTCI5: IN THE CONTEXT OF POTENTIAL SIGNIFICANT GROWTH IN RETAIL FLOORSACE IN LEWISHAM TOWN CENTRE, WHAT APPROACH SHOULD BE TAKEN TO THE PROVISION OF PUBLIC / SHOPPER PARKING SPACES IN THE TOWN CENTRE?		
LTCI4A	Rationalise existing provision to encourage the use of public transport.	<p>Maintaining existing parking standards (Option A) would contribute towards Sustainability Objective Env2 (To reduce dependency on private cars) and potentially Soc 10 (To improve pedestrian safety in the town centre) and Soc12 (To reduce noise from road traffic, construction and industry).</p>
LTCI4B	Seek to retain existing levels of public parking.	
LTCI4C	Seek to increase provision of public parking.	



ENVIRONMENT

LTC16: PROTECTION OF THE RIVER ENVIRONMENT

LTC16A	New development should contribute to enhancing and protecting the river environment.	Option A would contribute to Soc3 (To increase recreational access to the Quaggy and Ravensbourne Rivers) if they also increase access to the rivers. Option A would also contribute towards Sustainability Objective Env8 (To protect, value and enhance biodiversity) if the ecological value of the rivers is protected and enhanced.
LTC16B	On the basis that there is no demonstrable harm to the river and its environment contributions should not be sought.	



E. CONSULTATION AND NEXT STEPS

Purpose of consultation on issues and options

The Council has produced this Issues and Options report utilising the wide base of evidence gathered for the Sustainability Scoping Report and the extensive consultation which was undertaken during the preparation of the Lewisham Town Centre Development Strategy in 2004. The list of issues and options in this report is relatively comprehensive, but there may be other issues which have not been identified. If you would like to raise additional issues or options, please take this opportunity to do so.

Overview of consultation

Involving local people and stakeholders in the development of the Lewisham town centre Area Action Plan is vital to ensure that the plan responds to the local needs and priorities in an inclusive and sustainable manner. As such the Council has produced a programme of consultation which is intended to engage a wide range of people and organisations. This has been undertaken in response to the emerging Lewisham Statement of Community Involvement (SCI) which identifies the Council's objectives with respect to consultation and community engagement.

The Council will be undertaking two main periods of consultation on the AAP during the production phase of the AAP. The first stage relates to the preparation of issues, options and preferred options. The second stage is a formal phase of consultation on the preferred options. These are examined below:

Issues and Options phase - September to October 2005

Regulation 25 of the Planning and Compulsory Purchase Act (2004) stipulates that the Council must prepare issues and options in consultation. Consultation should be continuous with a view to building consensus with respect to the preparation of preferred options. It should be noted that this consultation is not a formal statutory process.

Preferred Options phase - February / March 2006

Regulation 26 of the Planning and Compulsory Purchase Act (2004) states that the public should participate on preferred options. This phase of consultation is formal public participation and will incorporate a six week consultation period. A full Sustainability Appraisal will be published in parallel with the Preferred Options outputs.

The following table lists the consultation techniques which are proposed for the issues and options phase, the target stakeholders and indicative timescales for comment.

METHOD	TIMING	FORM OF CONSULTATION	TARGET GROUPS
Previous consultation from Development Strategy	Undertaken continuously through 2004.	<p>Detailed review of consultation which was undertaken for Development Strategy. This has fed into issues and options generation. The following methods were incorporated:</p> <ul style="list-style-type: none"> - One-to-one meetings with stakeholders; - Walking Audit event (in-depth hands on planning exercise); - 2 Town Centre Information Days (including questionnaires); - Submissions to Lewisham Town Centre Development Strategy website; and - Letters to landowners. 	<p>Officers</p> <p>SRB board</p> <p>Community organisations</p> <p>Market traders</p> <p>Landowners and representatives</p>
Preparation of issues and alternative options	September - October (comments to be received by 12 October)	<p>Formal letter to landowners and statutory consultees informing them of the AAP process and opportunity to comment</p> <p>Letters providing information on:</p> <ul style="list-style-type: none"> - LDF/AAP context and process; - Town Centre context; - Link between LTCDS and AAP; - Inviting feedback to assist generation of options; and - Explanation of further consultation opportunities. 	Council Town Centre Database



METHOD	TIMING	FORM OF CONSULTATION	TARGET GROUPS
Informal consultation on issues and options	September - October (comments to be received by 12 October)	Issues and Options report and directed questionnaire	Council Town Centre Database
		Questionnaire on issues and options (based on issues/options paper, which can be used as a basis for all consultation).	
	September	<u>Town Centre Info Day (24 Sept)</u>	
	September (Comments to be received by 12 October)	Internet - Include issues/ options and associated questionnaire on LBL website	General public and all users of the town centre
	9th September	<u>Town Centre Newsletter</u> include questionnaire and explanatory article	E-panel and advertised more widely



Please let us have any comments on issues and options using one of the following methods:

Please send comments to:

Sally Peters

Address:

London Borough of Lewisham
Planning Information Service
5th Floor
Laurence House
1 Catford Road
Catford
SE6 4SW

Tel: 020 8314 6540

Fax: 020 8314 3127

E-mail: sally.peters@Lewisham.gov.uk

To find out more information please visit the Area Action Plan page on the Council website:

<http://www.Lewisham.gov.uk/Environment/Planning/PlanningPolicy/LocalDevelopmentFramework/LewishamTownCentreAreaActionPlan.htm>

Next steps

The Issues and Options stage is being consulted on in an informal manner; with a wide range of stakeholders. In partnership with the Council, the consultant team led by Urban Practitioners will collate and assimilate the comments received. These comments will play a major role in determining the proposals and policies which are prepared for the preferred options stage, which the Council is proposing to consult on in early 2006.

Following participation on preferred options and representations, the AAP and Sustainability Appraisal will be submitted to the Secretary of State, before going through a process of examination and adoption.

