

Responses to the Lewisham Town Centre Local Plan Recommended Modifications Consultation 16 November 2012

There were 14 respondents to the consultation.

In addition to the three respondents to the Proposed Submission Consultation (see Examination Library document LTCLP1.9) who stated they wished to appear at the hearings, the following respondent to the Recommended Modifications Consultation stated that they may wish to appear.

- Icen Projects for Chesterhouse Properties (LMODREP7)

Consultation on the recommended modifications closed 12 November at 17:00. Two responses were received after the close of consultation which are included in the table below.

- CgMs for Mayor’s Office for Policing and Crime / Metropolitan Police Service (LMODREP1) – received by email 12 November 2012 at 17:26
- TfL Planning (LMODREP12) – received by email 13 November 2012 at 12:48

Respondent’s Name/ID	Representation ID	Paragraph, Policy, Section, Figure	Comment (sound/ unsound)	Summary of representation	Officers’ response	Modification?	Modification number in Schedule of modifications
CGMS for Met Police (LMODREP1)	LMODREP1.1	Policy LAAP16	Not stated	Policy is welcomed and supported	Noted, no changes are recommended	No change	N/A
	LMODREP1.2	Policy LAAP22		Support for the changes proposed in the schedule of main modifications to policy LAAP22 Social Infrastructure to include policing in response to the representation made by CGMS to the proposed submission version (previous consultation representation ref: LREP1.2)	The Council notes the support and considers previous consultation representation LREP1.2 to be resolved. No further changes are recommended.	No change	N/A
Dron & Wright for LFEPA (LMODREP2)	LMODREP2.1	Para 4.33	Not stated	Paragraph 4.33 states that Lewisham Fire Station is part of the Ladywell Town Centre Area,	Change is recommended – for inclusion in the Additional Modifications schedule.	Additional Modification	Not yet included in the Additional

				whereas Figure 3.2 shows it is located outside of this area.	<p>This is not a representation regarding the LTCLP schedules of recommended modifications issued for public consultation in Oct / Nov 2012. However, the Council acknowledge that this is a factual error and will remove the reference to Lewisham Fire Station from paragraph 4.33 prior to adoption of the LTCLP. The following change will be added to the Additional Modifications schedule:</p> <p>“Also in this Town Centre Area are the former library, the current and former fire station buildings, Ladywell leisure centre...”</p>		Modifications schedule
Environment Agency (LMODREP3)	LMODREP3.1	General	Sound	Support	Noted, no changes are recommended	No change	N/A
GLA (LMODREP4)	LMODREP4.1	General	Sound (and in general conformity with the London Plan)	<p>General support.</p> <p>Note: The GLA response also includes a summary of comments from TfL. These comments match those in the separate response received from TfL and officers' responses to these comments are detailed there (See LMODREP12)</p>	Noted, no changes are recommended	No change	N/A
GL Hearn for Land Securities (LMODREP5)	LMODREP5.1	Para 4.4, Section 4.2, Policy S5, Section 4.3 (key area objectives), Policy LAAP5	Sound	Support for the modifications recommended by the Council in response to the representations made by GL Hearn to the proposed submission version. (previous consultation representation refs: LREP8.4, 8.5, 8.7, 8.10, 8.11, 8.12, 8.13 and	The Council notes the support and considers previous consultation representations LREP8.4, 8.5, 8.7, 8.10, 8.11, 8.12, 8.13 and 8.16 to be resolved. No further changes are recommended	No change	N/A

		(para 2) and Policy LAAP8		8.16) The following comments (LMODREP5.2 – 5.5) by GL Hearn refer to their representation (LREP8) regarding the proposed submission version. These comments did not result in the Council recommending any modifications to the proposed submission plan.			
	LMODREP5.2	Policy LAAP16, vision, Objective 1, Section4, Para 3.15, Policy LAAP5 (para 2) and Policy S10 (a & b)	Sound	A number of objections made by GL Hearn in response to the proposed submission version consultation have now been withdrawn following accepted explanations from the Council (previous consultation representation refs: LREP8.1, 8.2, 8.3, 8.14, 8.17, 8.18 and 8.19)	The Council notes the support and considers previous consultation representations LREP8.1, 8.2, 8.3, 8.14, 8.17, 8.18 and 8.19 to be resolved. No changes are recommended	No change	N/A
	LMODREP5.3	Para 4.8, Policy LAAP4 and Policies S3a and S3b	Unsound (not consistent with national policy)	Any reference to the Loampit Vale site being an 'edge of centre' site should be removed, and it should be made clear that the site is only suitable for bulky retail goods to protect the town centre. This representation relates to previous consultation representation refs: LREP8.6, 8.8 and 8.9)	No changes are recommended. The Council consider that given the pedestrian and transport links to the primary shopping area and the proposed development at Lewisham Gateway which will link the two areas, that this area is currently considered as 'edge of centre' and on development of the Lewisham Gateway scheme will become 'town centre'.	No change	N/A
	LMODREP5.4	Policy LAAP8 1(a)	Unsound (not effective)	It is imperative for the future viability of the retail space within the Shopping Centre that Land	No changes are recommended. The improvement of pedestrian connections in the town centre is an	No change	N/A

				<p>Securities is able to manage the retail circuit appropriately to protect and preserve footfall through the centre and along its key retail frontages. As currently worded, we consider that the policy objective may be misconstrued and prejudice this ability as unless carefully planned new or reconfigured entrances could have a negative impact on footfall and therefore on the attractiveness to retailers of certain units within the centre. Policy LAAP8 could prevent the overall vision to improve the Shopping Centre as part of the wider retail provision in Lewisham. This representation relates to previous consultation representation ref: LREP8.20</p>	<p>integral part of the LTCLP and the Council feels that this change could undermine the policy.</p>		
	LMODREP5.5	Figure 5.1	Unsound (not effective or consistent with national policy)	<p>Figure 5.1 allocates the proposed 'primary shopping area', and 'secondary shopping area', as stated within the key for the plan, not primary shopping frontage, as stated in the Council response to LREP8.20. Currently, Figure 5.1 excludes Riverdale Hall from the 'primary shopping area' which is inconsistent with it's context as part of the wider shopping centre. Therefore, Figure 5.1 is considered to be 'unsound' as it could prevent the overall vision to improve the Shopping Centre as part of the wider retail provision in Lewisham.</p>	<p>No changes are recommended. The Council acknowledges that Figure 5.1 has caused confusion. Figure 5.1 is intended to display the primary and secondary 'shopping frontages' not the 'primary shopping area'. The Council are currently preparing a response to the Inspectors Question 8 (see LTCLP examination website), which requests clarification of Figure 5.1. The Council will recommend that the error in the chart is corrected, so the map legend displays "primary shopping frontage" and "secondary shopping frontage" and Figure 5.1 is re-titled as "Retail designations".</p>	No change	N/A
Highways	LMODREP6.1		Not stated	No comments	Noted, no changes are recommended	No change	N/A

Agency (LMODREP6)							
Iceni Projects for Chesterhouse Properties (Thurston Industrial Estate) (LMODREP7)	LMODREP7.1	Vision and objectives	Sound	Support	Noted, no changes are recommended	No change	N/A
	LMODREP7.2	Policy LAAP4	Unsound (justified, effective, consistent with national policy)	Iceni Projects have proposed extensive changes to policy LAAP4 regarding the type of retail provision that is acceptable in the area.	This is not a representation regarding the LTCLP schedules of recommended modifications issued for public consultation in Oct / Nov 2012. The comments made are not considered by the Council as applicable to this stage of consultation.	No change	N/A
Natural England (LMODREP8)	LMODREP8.1	General	Not stated	No comments	Noted, no changes are recommended	No change	N/A
Nathaniel Lichfield & Partners (NLP) for Tesco (LMODREP9)	LMODREP9.1	Section 4.3 and Policy LAAP5	Not stated	NLP have proposed extensive changes to both Section 4.3 and Policy LAAP5 regarding the type of uses that are acceptable in the Conington Road area.	This is not a representation regarding the LTCLP schedules of recommended modifications issued for public consultation in Oct / Nov 2012. The comments made are not considered by the Council as applicable to this stage of consultation.	No change	N/A
Port of London Authority (LMODREP10)	LMODREP10.1	General	Not stated	No comments	Noted, no changes are recommended	No change	N/A
Ray Hall (LMODREP11)	LMODREP11.1	General	Not stated	Mr Hall has submitted a number of comments regarding the general approach to the redevelopment of the town centre, that are broadly similar to his comments made during previous rounds of consultation.	This is not a representation regarding the LTCLP schedules of recommended modifications issued for public consultation in Oct / Nov 2012. The comments made are not considered by the Council as applicable to this stage of consultation.	No change	N/A

TfL Planning (LMODREP12)	LMODREP12.1	General	Not stated	TfL recognises that changes have been made since the proposed submission stage with respects to our previous comments and welcomes these.	Support noted, no changes are recommended	No change	N/A
	LMODREP12.2	Para 5.80		One comment in the response regarding the Site Allocations Local Plan appears to actually concern the LTCLP. LREP15.2 requested modifications to paragraph 5.80 and the this was agreed by the Council as MM22 in the schedule of main modifications. TfL would now like this paragraph to talk of access matters too.	The Council do not feel that this change is necessary, therefore no further change is recommended	No change	N/A
	LMODREP12.3	Section 4.1, Figures 3.6 and 5.4, Policy LAAP20		Comments are made by TfL that are broadly the same as previous representations (LREP15.3, 15.5 and 15.7) regarding the proposed submission version. These comments did not result in the Council recommending any modifications to the proposed submission plan.	No changes are recommended	No change	N/A
	LMODREP12.4	General		Further comments relate to the planning application consultation process, public realm and bus stops in Conington Road.	These are not comments regarding the LTCLP schedules of recommended modifications issued for public consultation in Oct / Nov 2012. The comments made are not considered by the Council as applicable to this stage of consultation	No change	N/A
Thames Water (LMODREP13)	LMODREP13.1	Policy LAAP26	Not stated	Thames Water have confirmed that they agree with the inclusion of the recommended modification to the plan numbered MM25 in	Agreement welcomed and noted. No further changes are recommended	No change	N/A

				the original Schedule of Main Modifications (LTCLP1.7)			
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