



Your Ref:
Our Ref: 12/1683

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Planning Policy
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Dear Mr Regan

Lewisham Town Centre Local Plan Document - Submission

The following response contains comments from the TfL Borough Planning team regarding the Lewisham Town Centre Local Plan Document, final submission. A separate response will be provided from the TfL Consents team, from a land ownership perspective.

TfL recognises that changes have been made since the proposed submission stage with respects to our previous comments and welcomes these, although we believe that further changes can still be made.

General Point

TfL should be consulted when a development could affect TfL infrastructure (e.g. highway, DLR, LO and/or bus). TfL is the highway authority for the Transport for London Road Network (TLRN) and is therefore concerned about any proposal which may affect the performance and/or safety of the TLRN. TfL also have a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the Strategic Road Network (SRN). Thus TfL should also be consulted about proposals which could affect TLRN and/or SRN. TfL should also be consulted about proposals which could impact upon bus or other public transport services

Public Realm

A number of policies and site allocations mention public realm improvements on the TLRN and SRN, for example Loampit Vale Town Centre Area, Lea High Road and site S8 (Ladywell Leisure centre site). Whilst TfL is generally in support of public realm improvements, each proposal must consider all road users and the policy to smooth traffic and tackle congestion (London Plan Policy 6.11). Therefore TfL should be consulted on the details of any development or scheme proposals affecting the TLRN and SRN from an early stage, as it is likely that TfL approval will be required. Early TfL involvement is

particularly important where junction improvements and/or new crossing facilities are proposed as these may have an impact on traffic flow.

In particular, Policy LAAP21 section 3 lists proposals that affect the TLRN and as such will need to be agreed with TfL. There is also a need to take account what if any public funding is available, for example in the TfL Business Plan or through the Local Implementation Plan process.

Section 4 - Unallocated site in Thurston Road

TfL suggests an unallocated site in Thurston Road (the site between S5 and S3b and to the north of S3a) is included within the AAP. It is part of the Lewisham Gateway scheme and as such planning permission exists for its use as a replacement bus stand for the facilities currently located within site S1. The development of the stand has not yet commenced but the site is vacant and thus should be treated in the same manner as the Lewisham Gateway scheme.

The proposal for improved station access from Thurston Road, as illustrated on figures 3.6 and 5.4, needs to be reconciled with the approved use of this site as a bus stand.

Lewisham Gateway

TfL have been closely involved in the Lewisham Gateway scheme, which will require a fundamental change in bus operation and the layout of the TLRN in the vicinity. As such, TfL are key consultees and will be required to give consent (for example for the highway works) The AAP advises that Lewisham Gateway is one of the five strategic site allocations in the Council's Core Strategy and thus a specific AAP policy is not necessary. Therefore no comment is made here.

Site S6 – Tesco's block, car park and petrol station

Connington Road has a bus stand and stops and as such any development of or at the site should retain these in-situ, or an alternative agreed with TfL.

Car Parking

It would be useful for the AAP to contain parking standards for the main use classes. These standards should accord with London Plan policy 6.13 (Parking). As Lewisham town centre has a high PTAL, it would be expected that the parking standards are at the more restrictive end of borough wide standards.

The Tesco store (Connington Road) does not have publicly available car parking and is only for Tesco shoppers. Also the identified Thurston Road car parking (west gateway) is reliant upon redevelopment. The AAP could make it clear that the strategy for public parking will only be deliverable if and when the relevant sites are redeveloped and therefore it will take time to realise.

I hope you find these comments useful.

Yours sincerely

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