

# Addendum to the Sustainability Appraisal of the Lewisham Town Centre Local Plan

## **Review of Main Modifications**

13 March 2013

*Produced for*

London Borough of Lewisham

*Produced by*

Mouchel

209-215 Blackfriars Road

London

SE1 8NL

UK

**T** 0207 803 2600

**F** 0207 803 2601

# Document Control Sheet

Project Title                    Lewisham Town Centre Local Plan

Report Title                    Addendum to the Sustainability Appraisal of the Lewisham Town  
Centre Local Plan – Review of Main Modifications

Version                         1

Status                          Final

Report Date                    13 March 2013

## Record of Issue

Version	Status	Author	Date	Checked by	Date	Approved by	Date
1	Draft	OE	08.03.2013	MD/NK	08.03.2013	KS	11.03.2013
2	Final	OE	13.03.2013	NK	13.03.2013	NK	13.03.2013

## Distribution

Date	Organisation	Contact	Format	Copies
11 March	London Borough of Lewisham	Matthew Pullen	e	1
13 March	London Borough of Lewisham	Matthew Pullen	e	1

## Limitations

This report is presented to the London Borough of Lewisham in respect of the Lewisham Town Centre Local Plan, as a Review of Main Modifications, and may not be used or relied on by any other person. It may not be used by the London Borough of Lewisham in relation to any other matters not covered specifically by the agreed scope of this Report.

Notwithstanding anything to the contrary contained in the report, Mouchel Limited is obliged to exercise reasonable skill, care and diligence in the performance of the services required by the London Borough of Lewisham and Mouchel Limited shall not be liable except to the extent that it has failed to exercise reasonable skill, care and diligence, and this report shall be read and construed accordingly.

This report has been prepared by Mouchel Limited. No individual is personally liable in connection with the preparation of this report. By receiving this report and acting on it, the client or any other person accepts that no individual is personally liable whether in contract, tort, for breach of statutory duty or otherwise.

# Contents

<b>1</b>	<b>Introduction.....</b>	<b>1</b>
1.1	Next Steps.....	1
<b>2</b>	<b>Review of Main Modifications.....</b>	<b>2</b>
2.1	MM1 – Text Amendment .....	2
2.2	MM2 – New Policy.....	2
2.3	MM3 – Text Amendment .....	4
2.4	MM4 – Deletion of Text.....	4
2.5	MM5 – Text Amendment .....	5
2.6	MM6 – Text Deletion/Addition.....	6
2.7	MM7 – Map Amendments.....	6
2.8	MM8 – Additional Text.....	7
2.9	MM9 – Additional Text.....	9
2.10	MM10 – Text Amendment.....	9
2.11	MM11 – Text Amendment.....	10
2.12	MM12 – Text Amendment.....	10
2.13	MM13 – Deletion of Text.....	11
2.14	MM14 – Additional Text.....	12
2.15	MM15 – Additional Text.....	12
2.16	MM16 – Additional Text.....	13
2.17	MM17 – Additional Text.....	13

2.18	MM18 – Additional Text .....	14
2.19	MM19 – Map Amendments.....	15
2.20	MM20 – Additional Text.....	16
<b>3</b>	<b>Conclusion.....</b>	<b>17</b>
	<b>Appendix A.....</b>	<b>18</b>

## Tables

Table 1 - Key Score Matrix .....	19
Table 2 - New Policy Appraisal .....	19

# 1 Introduction

This Addendum report has been prepared in response to the 20 Main Modifications (MM) that have been proposed to the Lewisham Town Centre Local Plan (LTCLP), previously known as the Lewisham Town Centre Area Action Plan, following an examination in public held on the 15<sup>th</sup> and 16<sup>th</sup> of January 2013. On completion of the examination, the London Borough of Lewisham (LBL) has prepared a consolidated schedule of recommended MM to the LTCLP.

This addendum report seeks to detail the changes and any implications following a review of the 20 MM. This review involves the assessment of any implications to the Sustainability Appraisal (SA) of the policies, the cumulative effects and the mitigation sections of the SA report. This addendum report should be read in conjunction with the following documents:

- Sustainability Appraisal of the Lewisham Town Centre Area Action Plan, Submission Version, published in September 2012;
- Sustainability Appraisal of the Lewisham Town Centre Area Action Plan, Proposed Submission Version, published in January 2012;
- Lewisham Town Centre Local Plan, Post examination version for consultation, February 2013; and,
- The consolidated schedule of recommended main modifications to the Lewisham Town Centre Local Plan, February 2013 (Post examination version for public consultation).

## 1.1 Next Steps

The MM will be subject to a period of public consultation, together with this addendum report. Following this, any comments made will be passed directly to the Planning Inspector, who will consider them when assessing the LTCLP.

## 2 Review of Main Modifications

The MM that resulted from the Examination have been proposed by either LBL, the Planning Inspector or other representation, or a combination of the three. The MM consist of a combination of a new policy to ensure conformity with the National Planning Policy Framework, changes to existing policies, clarification points and corresponding changes to map legends. No changes have been made to the strategy of the LTCLP.

### 2.1 MM1 – Text Amendment

This modification is proposed by LBL and responds to an omission from the proposed submission version of the LTCLP of an appendix relating to Unitary Development Plan (UDP) policies replaced by the LTCLP.

Proposed Change	Implications for SA
The AAP supersedes the saved UDP <del>policies and site allocations</del> <b>proposals</b> as they apply to Lewisham town centre <b>(as identified in <u>Appendix 6: UDP Proposals replaced by the LTCLP</u>)</b> and all other adopted guidance, including the Lewisham Gateway Planning Brief (2002).	Minor amendment to text.  No implications for SA

There are no significant effects arising from this proposed modification of text which inserts previously omitted reference to the replacement of UDP Proposals by the LTCLP. The MM1 does not change the original findings of the SA. There are no cumulative effects and subsequently no mitigations applicable to this modification.

### 2.2 MM2 – New Policy

MM2 has been proposed by LBL and is required to ensure that the submitted LTCLP is sound. The addition of Policy LTC0 'Presumption in favour of sustainable development' is also required to ensure consistency with the NPPF.



Proposed Change	Implications for SA
<p><i>(for insertion after page 20)</i></p> <p><b><u>Presumption in favour of sustainable development</u></b></p> <p><b><u>The NPPF states that Local Plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally (paragraphs 14 and 15). To support this approach, all policies in the LTCLP should be read in the context of Policy LTC0 – Presumption in favour of sustainable development.</u></b></p> <p><b><u>Policy LTC0 – Presumption in favour of sustainable development</u></b></p> <p><b><u>When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants to find solutions which mean that proposals secure development that improves the economic, social and environmental conditions in the borough.</u></b></p> <p><b><u>Planning applications that accord with the policies in the Lewisham Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.</u></b></p> <p><b><u>Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</u></b></p> <ul style="list-style-type: none"> <li><b><u>• Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against</u></b></li> </ul>	<p>New assessment required for this policy insertion.</p> <p>See Appendix A</p>

<p><b><u>the policies in the National Planning Policy Framework taken as a whole; or</u></b></p> <p><b><u>• Specific policies in that Framework indicate that development should be restricted.</u></b></p>	
---	--

New policies automatically trigger the need for an additional assessment to ensure they are subject to the same level of assessment as the policies that were included in the previous version of the LTCLP. This will also ensure the robustness of the appraisal process. Any cumulative impacts and/or mitigations are addressed in the comments section of the policy appraisal matrix. See Appendix A of this Addendum for the appraisal of new Policy LTC0 – Presumption in Favour of Sustainable Development.

### 2.3 MM3 – Text Amendment

In response to initial questions by the Inspector, LBL has proposed a modification to Policy LAAP1, Figure 3.1 and associated accompanying text. LBL considers that these changes provide increased clarity to the boundaries referred to in the plan.

(Note that Policy LAAP1 was previously known as SH9 in earlier documents).

MM3 should be read in conjunction with MM4, MM5, MM6 and MM7.

Proposed Change	Implications for SA
3.1 The <del>town centre boundary</del> <b><u>plan boundaries</u></b>	<p>Amendment to text to provide context.</p> <p>No implication for SA when considered as a stand-alone (i.e. in isolation of the Policy LAAP1)</p>

There are no significant effects arising from this proposed modification of title text for section 3.1 of the LTCLP. The MM3 does not change the original findings of the SA as presented in the SA Report of March 2011 (see Appendix 1). There are no cumulative effects and subsequently no mitigations applicable to this modification.

### 2.4 MM4 – Deletion of Text

In response to initial questions by the Inspector, LBL has proposed a modification to Policy LAAP1, Figure 3.1 and associated accompanying text. LBL considers that these changes provide increased clarity to the boundaries referred to in the plan.

MM4 should be read in conjunction with MM3, MM5, MM6 and MM7.

Proposed Change	Implications for SA
<p><del>Overview</del></p> <p><del>The town centre plan area boundary has been reviewed and adjusted to provide the most appropriate scope to the town centre LTCLP.</del></p>	<p>Deletion of text to provide increased clarity in the context.</p> <p>No implication for SA when considered as a stand-alone (i.e. in isolation of the Policy LAAP1)</p>

There are no significant effects arising from this proposed modification by deletion of the overview text for Policy LAAP1 of the LTCLP. The MM4 does not change the original findings of the SA as presented in the SA of March 2011 (see Appendix 1). There are no cumulative effects and subsequently no mitigations applicable to this modification.

## 2.5 MM5 – Text Amendment

In response to initial questions by the Inspector, LBL has proposed a modification to Policy LAAP1, Figure 3.1 and associated accompanying text. LBL considers that these changes provide increased clarity to the boundaries referred to in the plan.

MM5 should be read in conjunction with MM3, MM4, MM6 and MM7.

Proposed Change	Implications for SA
<p><del>Town centre boundary</del> <b><u>Plan boundaries:</u></b></p> <p>The <b><u>plan area and</u></b> <del>town centre boundary</del> has <b><u>boundaries have</u></b> been defined as shown in Figure 3.1, <b><u>alongside those parts of the town centre that are considered edge of centre.</u></b></p>	<p>Minor changes in the form of renaming the original town centre boundary to plan area boundary, establishing a definite town centre boundary and displaying four areas as Edge of centre areas all within the new plan area boundary.</p> <p>No implication for SA when considered as a stand-alone (i.e. in isolation of the Policy LAAP1)</p>

The intent of Policy LAAP1 has not changed with these modifications. All changes in nomenclature occur within the original outline now termed Plan Area Boundary. This plan area has already been subject to SA; therefore no update to SA findings is required. No other cumulative impacts and/or mitigations are identified.

## 2.6 MM6 – Text Deletion/Addition

In response to initial questions by the Inspector, LBL has proposed a modification to Policy LAAP1, Figure 3.1 and associated accompanying text. LBL considers that these changes provide increased clarity to the boundaries referred to in the plan.

MM6 should be read in conjunction with MM3, MM4, MM5 and MM7.

Proposed Change	Implications for SA
<p><del>The town centre plan area boundary reflects the role of Lewisham as the borough's principal town centre and the aspiration to achieve metropolitan town centre status. The town centre boundary includes areas that may be considered as 'town centre', 'edge of centre' or 'out of centre' retail areas. Appropriate town centre uses and the level of future development within each area are provided in Section 4.</del></p> <p><b><u>The town centre boundary includes the primary shopping area and those areas predominantly occupied by main town centre uses. Within the town centre boundary, several locations are designated as 'edge of centre' while locations beyond the town centre boundary are considered 'out of centre'. These designations have been made in accordance with the definitions in the glossary of the NPPF.</u></b></p>	<p>Amendment of text to provide context and increased clarity to the plan boundaries.</p> <p>No implication for SA when considered as a stand-alone (i.e. in isolation of the Policy LAAP1)</p>

There are no significant effects arising from this proposed modification of text for Policy LAAP1 of the LTCLP. The MM6 does not change the original findings of the SA as presented in the SA Report of March 2011 (see Appendix 1). There are no cumulative effects and subsequently no mitigations applicable to this modification.

## 2.7 MM7 – Map Amendments

In response to initial questions by the Inspector, LBL has proposed a modification to Policy LAAP1, Figure 3.1 and associated accompanying text. LBL considers that these changes provide increased clarity to the boundaries referred to in the plan.

MM7 should be read in conjunction with MM3, MM4, MM5 and MM6.

Proposed Change	Implications for SA
<i>The following amendments are recommended to</i>	Amendment of figure to provide context

<p>Figure 3.1. A recommended modified version of Figure 3.1 has been included at the end of this schedule:</p> <ul style="list-style-type: none"> <li>• Rename the title of Figure 3.1 from <i>Town centre boundary</i> to <b>Plan boundaries</b></li> <li>• Rename the legend entry for <i>Town centre boundary</i> to <b>Plan area boundary</b></li> <li>• Add a new <b>Town centre boundary</b> to the legend and to the map</li> <li>• Add new <b>Edge of centre areas</b> to the legend and the map</li> </ul>	<p>and increased clarity to the plan boundaries.</p> <p>No implication for SA when considered as a stand-alone (i.e. in isolation of the Policy LAAP1)</p>
---	--

The intent of Policy LAAP1 has not changed with these modifications. All changes in nomenclature and mapping occur within the original outline now termed Plan Area Boundary. This plan area has already been subject to SA (see figure 3-2 of the SA Report of January 2012); therefore no update to SA findings is required. No other cumulative impacts and/or mitigations are identified.

MM3, 4, 5, 6 and 7 have been individually reviewed as having no implication for the SA. Furthermore, when these five Main Modifications are considered collectively, there are also no implications for the SA.

## 2.8 MM8 – Additional Text

LBL has proposed additional text that is intended to identify the total housing and retail development expected, and to compare this expectancy to the LTCLP vision.

Proposed Change	Implications for SA
<p><i>(for insertion after the second paragraph 3.11, that needs to be amended to be called paragraph 3.13)</i></p> <p><b><u>The six Town Centre Areas identified above and explored in Section 4 are allocated indicative development capacities for the potential delivery of housing. For Town Centre Area detail see Sections 4.1 to 4.6. The town centre wide total of the indicative capacities for housing is 2,420 which is 980 below the total development required by Objective 2 of 3,400. However 977 housing units are under construction or have already been delivered, meaning the total new homes for delivery in the town centre will be 2,420 plus 977 which equals 3,397.</u></b></p>	<p>Addition of text provides a basis for comparing potential total housing and retail floor space to the LTCLP Objectives.</p> <p>Implications identified for SA.</p>

<p><u>The Core Strategy (June 2011) states that up to 2,600 houses are to be accommodated in Lewisham town centre over the plan period (2011 – 2026). The Core Strategy designated homes only to the sites which were known, available and developable at the time in order to ensure the plan was deliverable. The increase in potential housing delivery in the LTCLP is mainly due to the identification of additional sites in the Conington Road, Central and Ladywell Town Centre Areas and the minor reassessment of the capacity of Loampit Vale and Lee High Road Town Centre Areas. No changes have been made to the capacities of individual development sites that were included in the calculation of the Core Strategy designation.</u></p> <p><u>The same capacity approach is used for retail floorspace. LTCLP Objective 1 identifies a requirement for 44,000sqm of new retail floorspace, while the indicative capacities of the six Town Centre Areas in Section 4 equate to 44,500sqm. There has been 3,050sqm of additional retail space already delivered, meaning the total new retail floorspace to be delivered is 47,550sqm.</u></p> <p><u>The Core Strategy (June 2011) states that up to 40,000sqm of retail floorspace is to be accommodated in the town centre. It is the emergence of a site previously not included in the Core Strategy that has caused the increase in deliverable space. The site is Lewisham Shopping Centre which is capable of delivering 10,000sqm of new space. All other town centre development sites considered in both the Core Strategy and all the LTCLP are expected to deliver the same or a very similar quantum of retail floorspace.</u></p>	
--	--

There are slight negative implications for the SA and LTCLP Objective 2 (Housing) as there is a short fall of three units in the total number of new homes for delivery in the town centre. This shortfall may be considered negligible; however mitigation can

be achieved by reassessing the indicative capacities of the Town Centre Areas for housing.

Conversely, there are positive implications for the LTCLP Objective 1 (Retail and Town Centre Status) due to the additional provision of 7,550sqm of retail floor space to be delivered over and above indicative capacities of 44,000sqm proposed in the LTCLP vision. With appropriate implementation, the delivery of the additional 7,550sqm of floor space will have a long term positive impact by potentially enhancing the economic viability of Lewisham Town Centre and supporting the bid to achieve a Metropolitan Town Centre status by 2026.

No further updates to the SA are required.

## 2.9 MM9 – Additional Text

MM9 has been proposed in order to respond to Land Securities concerns about the impact of new retail on the Primary Shopping Area in the Loampit Vale Town Centre area.

MM9 should be read in conjunction with MM10, MM11, MM12, MM13, MM14 and MM15.

Proposed Change	Implications for SA
.....and essential community facilities. <b><u>New retail provision should complement and not compete with the existing Primary Shopping Frontage.</u></b> Key route and public realm improvements.....	<p>Amendment of text to provide increased clarity in the context of use within the overview of the Loampit Vale Town Centre Area.</p> <p>No implication for SA when considered as a stand-alone (i.e. in isolation of the Policy LAAP4)</p>

There are no significant effects arising from this proposed modification of text for Policy LAAP4 of the LTCLP. The MM9 does not change the original findings of the SA as presented in the SA Report of September 2012 (see Table 5-22 in Section 5.8). There are no cumulative effects and subsequently no mitigations applicable to this modification.

## 2.10 MM10 – Text Amendment

LBL has proposed MM10 in response to initial questions by the Inspector. LBL considers that these changes provide increased clarity to the redevelopment objectives of the area.

MM10 should be read in conjunction with MM9, MM11, MM12, MM13, MM14 and MM15.

Proposed Change	Implications for SA
<p>.....<b><u>As part of any redevelopment of the area,</u></b> the Council will seek to <del>retain</del> <b>maximise</b> the <b><u>provision of</u></b> comparison retail <del>provision</del> <b><u>floorspace</u></b> in this edge of centre location to support the objective of becoming a metropolitan town centre.....</p>	<p>Amendment of text to provide increased clarity in the context of use within the overview of the Loampit Vale Town Centre Area.</p> <p>No implication for SA when considered as a stand-alone (i.e. in isolation of the Policy LAAP4)</p>

There are no significant effects arising from this proposed modification of text for Policy LAAP4 of the LTCLP. The MM10 does not change the original findings of the SA as presented in the SA Report of September 2012 (see Table 5-22 in Section 5.8). There are no cumulative effects and subsequently no mitigations applicable to this modification.

### 2.11 MM11 – Text Amendment

LBL has proposed MM11 in response to initial questions by the Inspector. LBL considers that these changes provide increased clarity to Policy LAAP4.1.

MM11 should be read in conjunction with MM9, MM10, MM12, MM13, MM14 and MM15.

Proposed Change	Implications for SA
<p>The Loampit Vale Town Centre Area is designated for mixed use development. <del>All proposals will be required to complement the Lewisham Gateway Town Centre Area.</del> <b><u>All proposals will be required to contribute to the realisation of the following principles.</u></b></p>	<p>Amendment of text to provide increased clarity in the context of use within the Policy LAAP4.1</p> <p>No implication for SA when considered as a stand-alone text (i.e. in isolation of the whole of Policy LAAP4.1)</p>

There are no significant effects arising from this proposed modification of text for Policy LAAP4.1 of the LTCLP. The MM11 does not change the original findings of the SA as presented in the SA Report of September 2012 (see Table 5-22 in Section 5.8). There are no cumulative effects and subsequently no mitigations applicable to this modification.

### 2.12 MM12 – Text Amendment

LBL has proposed MM12 in response to initial questions by the Inspector. LBL considers that these changes provide increased clarity to Policy LAAP4.1.



MM12 should be read in conjunction with MM9, MM10, MM11, MM13, MM14 and MM15.

Proposed Change	Implications for SA
<p><del>Conversion of comparison retail provision to convenience provision will not be considered acceptable. <b><u>This area is considered appropriate for non-food retail for bulky goods, but will not be considered acceptable for convenience retail.</u></b></del></p>	<p>Amendment of text to provide increased clarity in the context of use within the Policy LAAP4.1</p> <p>No implication for SA when considered as a stand-alone text (i.e. in isolation of the whole of Policy LAAP4.1)</p>

There are no significant effects arising from this proposed modification of text for Policy LAAP4.1 of the LTCLP. The MM12 does not change the original findings of the SA as presented in the SA Report of September 2012 (see Table 5-22 in Section 5.8). There are no cumulative effects and subsequently no mitigations applicable to this modification.

### 2.13 MM13 – Deletion of Text

LBL has proposed MM13 in response to initial questions by the Inspector. LBL considers that these changes provide increased clarity to Policy LAAP4.1.

MM13 should be read in conjunction with MM9, MM10, MM11, MM12, MM14 and MM15.

Proposed Change	Implications for SA
<p><del>Ground floor retail units should improve the comparison offer within the town centre.</del></p>	<p>Deletion of text to provide increased clarity in the context.</p> <p>No implication for SA when considered as a stand-alone (i.e. in isolation of the Policy LAAP4.1)</p>

There are no significant effects arising from this proposed modification of text by deletion for Policy LAAP4.1 of the LTCLP. The MM13 does not change the original findings of the SA as presented in the SA Report of September 2012 (see Table 5-22 in Section 5.8). There are no cumulative effects and subsequently no mitigations applicable to this modification.

**2.14 MM14 – Additional Text**

MM14 has been proposed in order to respond to Land Securities concerns regarding the clarity of Policy LAAP4.

MM14 should be read in conjunction with MM9, MM10, MM11, MM12, MM13 and MM15.

Proposed Change	Implications for SA
This site is considered most appropriate for a commercially led mix of uses ( <b><u>employment generating, most likely B1 use</u></b> ), although sensitive design could make some residential use acceptable.	<p>Additional text to provide increased clarity in the context of use within the Policy LAAP4.</p> <p>No implication for SA when considered as a stand-alone (i.e. in isolation of the Policy LAAP4)</p>

There are no significant effects arising from this proposed modification of text for Policy LAAP4 of the LTCLP. The MM14 does not change the original findings of the SA as presented in the SA Report of September 2012 (see Table 5-22 in Section 5.8). There are no cumulative effects and subsequently no mitigations applicable to this modification.

**2.15 MM15 – Additional Text**

LBL has proposed MM15 in response to initial questions by the Inspector. LBL considers that these changes provide increased clarity to the delivery context of Policy LAAP4.1.

MM15 should be read in conjunction with MM9, MM10, MM11, MM12, MM13 and MM14.

Proposed Change	Implications for SA
<p><i>(for insertion after paragraph 4.12)</i></p> <p><b><u>The Loampit Vale area is considered appropriate for non-food retail, selling bulky goods. It is expected that this will be through large stores specialising in the sale of household goods (such as carpets, furniture and electrical goods), DIY items and other ranges of goods, catering mainly for car-borne customers. In order to protect the continued provision of appropriate uses in the area, the Council may use planning conditions</u></b></p>	<p>Additional text to provide increased clarity within the delivery context of Policy LAAP4.1</p> <p>No implication for SA when considered as a stand-alone (i.e. in isolation of the Policy LAAP4.1)</p>

<b><u>to restrict the Use Class Order so that approved uses are not amended using permitted changes in the Use Class Order.</u></b>	
---	--

There are no significant effects arising from this proposed modification of text for Policy LAAP4.1 of the LTCLP. The MM15 does not change the original findings of the SA as presented in the SA Report of September 2012 (see Table 5-22 in Section 5.8). There are no cumulative effects and subsequently no mitigations applicable to this modification.

MM9, 10, 11, 12, 13, 14 and 15 have been individually reviewed as having no implication for the SA. Furthermore, when these seven Main Modifications are considered collectively, there are also no implications for the SA.

**2.16 MM16 – Additional Text**

MM16 has been proposed in order to respond to Land Securities concerns regarding the level of acceptable retail provision in the Conington Road town centre area.

MM16 should be read in conjunction with MM17.

Proposed Change	Implications for SA
Provide retail services for the Borough’s residents <b><u>in the form of an extension to the existing foodstore</u></b> , suitable for an edge of centre location that supplements those contained in the Central Area.	Additional text to provide increased clarity within the key area objectives context of Policy LAAP5.  No implication for SA when considered as a stand-alone (i.e. in isolation of the Policy LAAP5)

There are no significant effects arising from this proposed modification of text for Policy LAAP5 of the LTCLP. The MM16 does not change the original findings of the SA as presented in the SA Report of March 2011 (see Appendix 1). There are no cumulative effects and subsequently no mitigations applicable to this modification.

**2.17 MM17 – Additional Text**

MM17 has been proposed in order to respond to Land Securities concerns regarding the level of acceptable retail provision in the Conington Road town centre area.

MM17 should be read in conjunction with MM16.

Proposed Change	Implications for SA
Development involving underground parking,	Additional text to provide increased clarity

retail expansion <b>of the existing store</b> (up to 3,000m additional floorspace.	within the context of Policy LAAP5.  No implication for SA when considered as a stand-alone (i.e. in isolation of the Policy LAAP5)
--	---

There are no significant effects arising from this proposed modification of text for Policy LAAP5 of the LTCLP. The MM17 does not change the original findings of the SA as presented in the SA Report of March 2011 (see Appendix 1). There are no cumulative effects and subsequently no mitigations applicable to this modification.

MM16 and 17 have been individually reviewed as having no implication for the SA. Furthermore, when these two Main Modifications are considered collectively, there are also no implications for the SA.

### 2.18 MM18 – Additional Text

In response to discussions held at the examination, LBL and the Inspector proposed additional text to clarify the primary and secondary shopping frontages both existing and proposed in the town centre.

Proposed Change	Implications for SA
<i>The following amendments are recommended to Table 5.1 below</i>	Additional text to provide increased clarity within the context of the rationale for defining what constitutes primary and secondary retail frontages for both existing infrastructure and proposed development within Policy LAAP16.  No implication for SA when considered as a stand-alone (i.e. in isolation of the Policy LAAP16)

Table 5.1: Retail frontages

<b>Primary shopping frontage</b>
<b><u>Existing primary shopping frontage</u></b> The Lewisham Shopping Centre 70-212 Lewisham High Street
<b><u>Proposed primary shopping frontage</u></b> <b><u>Retail development in the Lewisham Gateway Policy Area (excluding Kings Hall Mews) as reflected indicatively on Figure 4.1</u></b>
<b>Secondary shopping frontage</b>

<p><b><u>Existing secondary shopping frontage</u></b> 73-83, 85-229, 236-252 and 262-328 Lewisham High Street 1-43 and 2-32 Lewis Grove 1-91 and 6-120 Lee High Road</p> <p><b><u>Proposed secondary shopping frontage</u></b> <b><u>Retail development in the Loampit Vale Policy Area as reflected indicatively on Figure 4.2</u></b></p>
---

There are no significant effects arising from this proposed modification of text for Policy LAAP16 of the LTCLP. The MM18 does not change the original findings of the SA as presented in the SA Report of March 2011 (see Appendix 1). There are no cumulative effects and subsequently no mitigations applicable to this modification.

## 2.19 MM19 – Map Amendments

LBL has proposed MM19 in response to initial questions by the Inspector. LBL considers that these changes will provide increased clarity to the designations referred to in the LTCLP.

Proposed Change	Implications for SA
<p><i>The following amendments are recommended to Figure 5.1. A recommended modified version of Figure 5.1 has been included at the end of this schedule:</i></p> <ul style="list-style-type: none"> <li>• <i>Rename the title of Figure 5.1 from <del>Retail areas</del> to <b><u>Retail designations</u></b></i></li> <li>• <i>Rename the legend entry for <del>Primary shopping area</del> to <b><u>Primary shopping frontage</u></b></i></li> <li>• <i>Rename the legend entry for <del>Secondary shopping area</del> to <b><u>Secondary shopping frontage</u></b></i></li> <li>• <i>Add the <b><u>Primary shopping area</u></b> to the legend and to the map</i></li> <li>• <i>Add the <b><u>Proposed additional primary shopping frontage</u></b> to the legend and to the map</i></li> <li>• <i>Add the <b><u>Proposed additional secondary shopping frontage</u></b> to the legend and to the map</i></li> <li>• <i>Add the <b><u>Secondary shopping frontage changing to primary shopping frontage</u></b> to the legend and to the map</i></li> </ul>	<p>Amendment of Map text and key to reflect changes to specific nomenclature and provide increased clarity to the plan designation and Policy LAAP16.</p> <p>No implication for SA when considered as a stand-alone (i.e. in isolation of the Policy LAAP16)</p>

The intent of Policy LAAP16 has not changed with these modifications. All changes in nomenclature and mapping occur within the original outline now termed Plan Area

Boundary. This plan area has already been subject to SA; therefore no update to SA findings is required. No other cumulative impacts and/or mitigations are proposed.

**2.20 MM20 – Additional Text**

LBL has proposed MM20 in order to ensure the LTCLP is sound. This appendix was omitted from the proposed submission version of the LTCLP and requires inclusion in order for the plan to be consistent with The Town and Country Planning (Local Planning) (England) Regulations 2012 (Part 4 8.(5)).

Proposed Change	Implications for SA										
<p><b><u>Appendix 5: UDP proposals replaced by the LTCLP</u></b></p> <p><b><u>The following table lists the development sites, as shown in UDP Schedule 1 and on the UDP Proposals Map, that have been implemented or amended so far by changing circumstances as to be replaced by new sites. There is no need to show these sites on the Proposals Map and the site references can be deleted.</u></b></p> <p><i>See table below to be added as Appendix 5: UDP proposals replaced by the LTCLP</i></p>	<p>Additional text to provide increased clarity within the LTCLP.</p> <p>No implications for SA.</p>										
<p>Appendix 5: UDP proposals replaced by the LTCLP.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #add8e6;"> <th style="text-align: center;">Site Ref.</th> <th style="text-align: center;">Site Address</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;"><u>37</u></td> <td><u>Lewisham Passenger Transport Interchange site</u></td> </tr> <tr> <td style="text-align: center;"><u>39</u></td> <td><u>Lewisham Town Centre – Odeon Site</u></td> </tr> <tr> <td style="text-align: center;"><u>40</u></td> <td><u>Lewisham Town Centre – Riverdale</u></td> </tr> <tr> <td style="text-align: center;"><u>40a</u></td> <td><u>206 – 210 Lewisham High Street and ‘Model Market’, SE13</u></td> </tr> </tbody> </table>		Site Ref.	Site Address	<u>37</u>	<u>Lewisham Passenger Transport Interchange site</u>	<u>39</u>	<u>Lewisham Town Centre – Odeon Site</u>	<u>40</u>	<u>Lewisham Town Centre – Riverdale</u>	<u>40a</u>	<u>206 – 210 Lewisham High Street and ‘Model Market’, SE13</u>
Site Ref.	Site Address										
<u>37</u>	<u>Lewisham Passenger Transport Interchange site</u>										
<u>39</u>	<u>Lewisham Town Centre – Odeon Site</u>										
<u>40</u>	<u>Lewisham Town Centre – Riverdale</u>										
<u>40a</u>	<u>206 – 210 Lewisham High Street and ‘Model Market’, SE13</u>										

There are no significant effects arising from this proposed modification by insertion of previously omitted text. The MM20 does not change the original findings of the SA as presented in the SA Report of September 2012 (see Appendix 3 Policies, Plans and Programmes of the SA Further Options Report). There are no cumulative effects and subsequently no mitigations applicable to this modification.

### 3 Conclusion

The aim of this SA Addendum is to determine whether there were likely to be any significant sustainability effects arising from the proposed Main Modifications to the Lewisham Town Centre Local Plan. In order to do this it was necessary to identify whether any of the proposed modifications to the plan could result in changes to the original findings of the sustainability appraisal, as documented in the SA Report (January 2012).

The SA Report (January 2012) identified the potential for cumulative effects to arise from implementing the LTCLP against a range of SA topics including air quality, landscape, soils, biodiversity, water quality and climate change. The report also noted that, without implementation of the LTCLP i.e.: the “business as usual” scenario, the impacts would be much more significant. Mitigation measures were identified that would help to reduce the potential for adverse effects.

Within this SA Addendum, none of the additional main modifications to the LTCLP when considered individually significantly alter the findings of the SA Report. Similarly, when considered collectively as in the case of MM3, 4, 5, 6 and 7; MM10, 11, 12, 13, 14 and 15; and MM16 and 17, they also do not significantly alter the findings of the SA Report. However these proposed main modifications, will help to address some site specific issues and advance progress towards the achievement of several of the SA Objectives without necessarily contributing towards cumulative effects within the LTCLP.

## Appendix A

Appendix A sets out the Sustainability Appraisal of the proposed new policy LTC0 which is intended to bring the LTCLP in line with the National Planning Policy Framework. The policy is set out below and the appraisal follows.

### **Presumption in favour of sustainable development**

The NPPF states that Local Plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally (paragraphs 14 and 15). To support this approach, all policies in the LTCLP should be read in the context of Policy LTC0 – Presumption in favour of sustainable development.

#### Policy LTC0 – Presumption in favour of sustainable development

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants to find solutions which mean that proposals secure development that improves the economic, social and environmental conditions in the borough.

Planning applications that accord with the policies in the Lewisham Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted.



Table 1 - Key Score Matrix

++	Likely to have very positive impact
+	Likely to have positive impact
--	Likely to have very negative impact
-	Likely to have negative impact
I	Depends upon implementation
0	Neutral impact identified
?	Unknown impact

Table 2 - New Policy Appraisal

New Policy	Sustainability Objectives																												Comments	
	Soc 1	Soc 2	Soc 3	Soc 4	Soc 5	Soc 6	Soc 7	Soc 8	Soc 9	Soc 10	Soc 11	Soc 12	Soc 13	Env 1	Env 2	Env 3	Env 4	Env 5	Env 6	Env 7	Env 8	Env 9	Env 10	Eco1	Eco2	Eco3	Eco4	Eco5		
Policy LTC0	++	++	I	++	++	I	++	?	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	+	+	+	I	++	<p><b>Social:</b> Policy should ensure affordable homes and access to community facilities and amenities are favoured for development permissions.</p> <p><b>Environment:</b> Any new developments that promote sustainable development will limit the negative effects of such development on climate change and increase the efficient use of resources while enhancing the existing landscapes and nature conservation.</p> <p><b>Economic:</b> positive to the local economy</p>

This policy is a reflection of the National Planning Policy Framework (NPPF) paragraph 14 which states that the presumption in favour of sustainable development should be seen as a golden thread running through both plan making and decision taking. Therefore its inclusion in the Plan is necessary in order to ensure consistency.

Policy LTC0 is unlikely to result in significant effects that would not already be present under a 'business as usual' (without the Plan) scenario. The overall effects of this policy when considered against the SA Framework are positive. However three of the objectives are uncertain and one unknown, as these will depend on how policy LTC0 is interpreted by the Local Planning Authority in relation to the policies of the wider Local Plan.