

LEWISHAM CORE STRATEGY – MATTERS FOR EXAMINATION**WRITTEN REPRESENTATION – WHETHER THE PLAN’S RETAIL STRATEGY IS SOUND?**

- 1.1 This is a further written representation submitted on behalf of National Grid by Planning Perspectives LLP to expand on previous representations submitted on 6 April 2010.
- 1.2 The intention of this submission is to consider Matter 6 (under Written Representations) in relation to ‘whether the Plan’s retail strategy is sound’, in the context of our previous submissions.
- 1.3 Overall, our previous submissions welcomed the identification of Bell Green as a Local Hub and its designation as an out of centre retail park within the Council’s retail hierarchy. This designation is entirely appropriate given the history of the site and the planning permissions that are in place.
- 1.4 Our previous representations related to paragraph 6.120 and Spatial Policy 4 and they expressed our concern over the prescriptive nature of the wording of these parts of the Core Strategy. Spatial Policy 4 as currently drafted requires the floorspace and range of goods to be limited to that granted planning permission and Paragraph 6.120 states that the Council will not grant planning permission for further retail and non-food retail development on Bell Green beyond a maximum of 16,110 sq.m.
- 1.5 As presently worded we would contend that this renders the retail strategy as ‘unsound’ as it cannot be effective. Paragraph 4.44 of PPS12 states that, to be ‘effective’, Core Strategies must be deliverable, flexible and able to be monitored. It is our view that the explicit wording of these policies is not sufficiently flexible to respond to a variety of, or unexpected change in circumstances.
- 1.6 The site at Bell Green has undoubtedly suffered at the hands of economic downturn. The previous developer of the site has gone into receivership and this is the fundamental reason why the site has not yet been developed. National Grid is now in control of the site again and is keen to do everything possible to fully implement the planning permissions that have been part implemented by the previous developer.
- 1.7 It is exactly these sorts of change in circumstance which the Council needs to accommodate in its Core Strategy and flexibility is key to achieving a sound retail strategy.
- 1.8 It is unlikely that the floor area listed within the text of the Core Strategy will alter significantly in the future, but minor variations to the floor area could help meet the needs of

modern retailer requirements and an element of flexibility should be built in to provide a policy context which will allow a development to come forward which is viable and deliverable. Indeed, recent research into the requirements of retailers who might occupy premises at the site has revealed that the permitted scheme options do not exactly meet their requirements and some modest adjustment in unit configuration and floor area will inevitably be required.

- 1.9 Therefore, rather than explicitly stating the floorspace restrictions in the Core Strategy, a more flexible and effective approach would be to the proposals against other criteria in the Core Strategy that ensure the protection of the viability of adjacent town centres. This will encourage full and early occupation of the retail development.