

**LOCAL DEVELOPMENT FRAMEWORK**

**Second Addendum to Sustainability  
Appraisal of the Lewisham Town Centre  
Local Plan (post second hearing version  
for public consultation)**

**Review of main modifications subsequent to the  
second hearing on the 9<sup>th</sup> July 2013**

**August 2013**

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## Introduction

This Addendum report has been prepared in response to the five Main Modifications (MM) that are proposed to the Lewisham Town Centre Local Plan (LTCLP), previously known as the Lewisham Town Centre Area Action Plan, following an additional examination in public hearing day held on the 9<sup>th</sup> July 2013. On completion of the examination, the London Borough of Lewisham (LBL) has prepared a consolidated schedule of main modifications and a consolidated LTCLP post second hearing version for consultation incorporating the five proposed MM.

This addendum report seeks to detail the changes and any implications following a review of the latest 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, which are available on the Council's website:

- Sustainability Appraisal and Strategic Environmental Assessment of the Lewisham Town Centre Area Action Plan Further Options Report, published March 2011;
- Sustainability Appraisal of the Lewisham Town Centre Area Action Plan, Proposed Submission Version, published in January 2012;
- Sustainability Appraisal of the Lewisham Town Centre Area Action Plan, Submission Version, published in September 2012;
- Addendum to the Sustainability Appraisal of the Lewisham Town Centre Local Plan, published March 2013;
- Consolidated Schedule of Recommended Main Modifications to the Lewisham Town Centre Local Plan, published August 2013 (post second hearing version for public consultation);
- Lewisham Town Centre Local Plan, Post second hearing version for consultation, published August 2013;
- The Inspector's observations to the Council on the agreed position reached on the 9<sup>th</sup> July 2013; and,
- Email response from the Inspector to the Council's comments, received 1<sup>st</sup> August 2013.

### ***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.

## Review of Main Modifications

### Summary of Main Modifications

The Inspector, in his observations to the Council on the agreed position reached on the 9<sup>th</sup> July, has proposed five MM. The Council has discussed further minor amendments to wording of the proposed MM subsequent to the hearing day, and this has been accepted by the Inspector in his email dated 1<sup>st</sup> August 2013.

The first four MM relate to MM previously recommended subsequent to the initial hearing days on the 15<sup>th</sup> and 16<sup>th</sup> January 2013:

- MM11 is to be deleted;
- MM15 is to be deleted;
- MM12 is to be reworded; and,
- MM17 is to be reworded.

The final MM does not relate to a previously raised MM, and will henceforth be known as MM21.

#### **MM11: Deletion**

It is proposed to delete MM11.

MM11 was a text amendment proposed to policy LTC4.1 subsequent to the first examination in public hearing on the 15<sup>th</sup> and 16<sup>th</sup> January 2013. The amendment sought to clarify the wording of the policy.

Stage	Proposed change	Implications for SA
Previous proposed change: Post 15 <sup>th</sup> and 16 <sup>th</sup> January hearing.	The Loampit Vale Policy Area is designated for mixed use development. <del>All proposals will be required to complement the Lewisham Gateway Town Centre Area, as follows:</del> <b><u>All proposals will be required to contribute to the realisation of the following principles:</u></b>	Previously assessed in first Addendum to the Sustainability Appraisal (March 2013).
Current proposed	The Loampit Vale Policy Area is designated for mixed use development. <del>All proposals will be</del>	Cumulatively assessed under the heading

change: Post 9 <sup>th</sup> July hearing.	<del>required to complement the Lewisham Gateway Town Centre Area, as follows: All proposals will be required to contribute to the realisation of the following principles:</del>	MM12 below.
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The proposed deletion of MM11 is to be read alongside the proposed re-wording of MM12.

MM12 proposes to re-word the policy LTC4.1 to allow for convenience retail. Therefore the individual implications for the SA of the deletion of MM11 cannot be assessed, and instead the cumulative implications are assessed under the heading MM12 below.

**MM15: Deletion**

It is proposed to delete MM15.

MM15 was a text addition proposed to the supporting text for policy LTC4.1 subsequent to the first examination in public hearing on the 15<sup>th</sup> and 16<sup>th</sup> January 2013. The amendment sought to clarify the context of the policy.

Stage	Proposed change	Implications for SA
<p>Previous proposed change: Post 15<sup>th</sup> and 16<sup>th</sup> January hearing.</p>	<p><i>Text addition for insertion after paragraph 4.12:</i> <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 to restrict the Use Class Order so that approved uses are not amended using permitted changes in the Use Class Order.</u></b></p>	<p>Previously assessed in first Addendum to the Sustainability Appraisal (March 2013).</p>
<p>Current proposed change: Post 9<sup>th</sup> July hearing.</p>	<p><del>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 to restrict the Use Class Order so that approved uses are not amended using permitted changes in the Use Class Order.</del></p>	<p>Cumulatively assessed under the heading MM12 below.</p>

The proposed deletion of MM15 is to be read alongside the proposed re-wording of MM12.

MM12 proposes to re-word the policy LTC4.1 to allow for convenience retail. The individual implications for the SA of the deletion of MM15 cannot be assessed, and instead the cumulative implications are assessed under the heading MM12 below.



**MM12: Re-wording**

It is proposed to re-word MM12. This entails the re-wording of policy LTC4.1.

Stage	Proposed change	Implications for SA
<p>Previous proposed change: Post 15<sup>th</sup> and 16<sup>th</sup> January hearing.</p>	<p>1. The Loampit Vale Policy Area is designated for mixed use development. <del>All proposals will be required to complement the Lewisham Gateway Town Centre Area, as follows:</del> <b><u>All proposals will be required to contribute to the realisation of the following principles:</u></b></p> <p>(a) uses located on the ground floor and possibly first floor will need to be retail (A1, A2, A3), business (B1) and community (D1, D2), which will complement rather than compete with existing town centre uses located in the Central Town Centre Area. <del>Conversion of comparison retail provision to convenience retail provision will not be considered acceptable.</del> <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></p> <p>(b) additional storeys will provide residential uses across a range of dwelling types and sizes in this highly accessible location,</p>	<p>Previously assessed in first Addendum to the Sustainability Appraisal (March 2013).</p>
<p>Current proposed change: Post 9<sup>th</sup> July hearing.</p>	<p>Loampit Vale Policy Area</p> <p>1. The Loampit Vale Policy Area is designated for mixed use development. All proposals will be required to <del>contribute to the realisation of the following principles:</del> <b><u>complement the Primary Shopping Area as follows:</u></b></p> <p>(a) uses located on the ground floor and possibly first floor will need to be retail uses (A1, A2, A3) <b><u>limited to the types specified in (b) and (c) below</u></b>, business (B1) and community (D1, D2), <del>which will complement rather than compete with existing town centre uses located in the Central Town Centre Area.</del> This area is <del>considered appropriate for non-food retail for bulky</del></p>	<p>No implication for SA when viewed holistically (see assessment below).</p>

	<p>goods, but will not be considered acceptable for convenience retail,</p> <p><b><u>(b) large-format non-food retail proposals will be considered appropriate subject to their having no demonstrable adverse impact on the Primary Shopping Area,</u></b></p> <p><b><u>(c) a food store of up to 1,500sqm (net sales area) will be acceptable on site S4, subject to any such proposal having no demonstrable adverse impact on the Primary Shopping Area and/or the local highway network,</u></b></p> <p>(d) additional storeys will provide residential uses across a range of dwelling types and sizes in this highly accessible location</p>	
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### *Explanation of proposed changes*

The proposed re-wording of policy LTC4.1 allows for the provision of convenience retail at site S4 limited to a size of 1,500sqm (net sales area). The previous policy wording had restricted any retail in this area to be non-convenience retail and had promoted the provision of non-food retail for bulky goods. This amendment to the policy requires an assessment of the possible implications for the previously published Sustainability Appraisals.

### *Assessment of possible implications*

Policy LTC4.1 has been subject a Sustainability Appraisal (March 2011) at the Further Options stage of the plan development, and the subsequent amendments to the policy have been subject a Sustainability Appraisal (September 2012) at the Submission stage and a further appraisal by means of an Addendum to the Sustainability Appraisal (March 2013) at the post hearing stage. These three reports, in addition to this current report, should be read in conjunction with each other.

Policy LTC4.1 (known as Character Area Policy 2 at the Further Options stage) read in conjunction with the explanatory text, has consistently proposed between 11,200sqm (at Submission stage) and 13,100sqm (at Further Options stage) of net retail floorspace to be developed within the Loampit Vale area.

The proposed changes to policy LTC4.1 retain the safeguard that any retail development shall not have a detrimental impact on the primary shopping area. The total amount of retail floorspace will remain at 11,200sqm as previously proposed in the Submission stage LTCLP. The proposed modification is that 1,500sqm of this total floor space could now be utilised for convenience retail. It is noted that the restriction on the type of retail provision was introduced at the submission stage, and had not been present at the Further Options stage of the LTCLP.

It is considered that the proposed changes to the type of retail at the proposed scale do not have a material effect on the sustainability issues which have previously been assessed in the published SAs. The SA produced at the Further Options stage found the provision of a similar level of retail floorspace without any restrictions on the type of retail provision to be acceptable in sustainability terms. The fundamental impact of

the policy on social, environmental and economic issues will remain as per the previous iterations of the policy.

Therefore it is concluded that the proposed re-wording of MM12 has no implications for the policies, cumulative effects or mitigation sections of the existing SA reports.

**MM17: Re-wording**

It is proposed to re-word MM17. This entails the re-wording of policy LTC5.

Stage	Proposed change	Implications for SA
Previous proposed change: Post 15 <sup>th</sup> and 16 <sup>th</sup> January hearing.	Additional site specific requirements: S6 Tesco block, car park and petrol station 2. Development involving underground parking, retail expansion <b>of the existing store</b> (up to 3,000 m additional floorspace) that complements the current town centre offer and residential development on this site will need to respond to the following principles:	Previously assessed in first Addendum to the Sustainability Appraisal (March 2013).
Current proposed change: Post 9 <sup>th</sup> July hearing.	Additional site specific requirements: S6 Tesco block, car park and petrol station 2. Development involving underground parking, <b>residential development</b> and retail expansion of the existing store (up to 3,000 sqm <b>net</b> additional floorspace) <del>that complements the current town centre offer and residential development on this site will need to respond to the following principles:</del> <b><u>will be acceptable, subject to any such proposal having no demonstrable adverse impact on the Primary Shopping Area. Development on the site will need to respond to the following principles:</u></b> ...(continue as submitted).....	The modifications clarify the wording of the existing policy. No implication for SA.

*Explanation of proposed changes*

The proposed re-wording of policy LTC5 has two purposes.

First, the insertion of the word “net” clarifies the maximum potential floorspace increase permissible at this site, and would bring the wording of the policy into line with the wording found in the Overview text at paragraph 4.17 of the Plan.

Second, the replacement of the wording “...that complements the current town centre offer...” with “...will be acceptable, subject to any such proposal having no demonstrable adverse impact on the Primary Shopping Area...” clarifies the way in which potential developments at the site should interact with the Primary Shopping Area.

*Assessment of possible implications*

The proposed modifications provide clarity to policy LTC5 without altering the fundamental meaning of the policy. It is considered that these clarifications therefore do not have any implications for the existing SA report.

**MM21: Re-wording**

It is proposed to re-word policy LTC7(2).

Stage	Proposed change	Implications for SA
Previous proposed change: Post 15 <sup>th</sup> and 16 <sup>th</sup> January hearing.	N/A: No change to policy LAAP7(2) previously proposed.	N/A
Current proposed change: Post 9 <sup>th</sup> July hearing.	2. The Council will seek to bring forward a comprehensive development of the Ladywell Leisure Centre site, and adjoining land where appropriate, for a mix of uses including <del>retail (A1, A2, A3) up to 1,400 sqm and housing (C3).</del> <b>housing (C3) and retail (A1, A2, A3), subject in the case of the retail element to <u>its having no demonstrable adverse impact on the Primary Shopping Area.</u></b>	The modification adds an additional safeguard to the existing policy. No implication for SA.

*Explanation of proposed changes*

The proposed re-wording of the policy inserts an additional safeguard to ensure that development in this location does not have an adverse impact on the Primary Shopping Area.

*Assessment of possible implications*

It is considered that the provision of an additional safeguard does not have material effect on the sustainability issues which have previously been assessed in the published SAs. The fundamental impact of the policy on social, environmental and economic issues will remain as per the previous iterations of the policy.

## **Conclusion**

The aim of this SA Addendum is to determine whether there are 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 reports (March 2011 and September 2012) and the Addendum to the Sustainability Appraisal (March 2013).

The SA report (September 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 proposed main modifications to the LTCLP when considered individually significantly alter the findings of the SA report. It is also considered that the proposed main modifications taken collectively do not impact on the findings of the SA report.