

To whom it may concern
Planning Policy Group
London Borough of Lewisham
5th floor
Laurence House
1 Catford Road
London
SE6 4RU

23 April 2012
Our ref: LTCAAP/2012
Your ref: C-0171144-01-01

Dear Sir/Madam

Representations to Lewisham Town Centre Area Action Plan Proposed Submission Consultation - April 2012

Introduction

These representations have been prepared in response to the Lewisham Town Centre Area Action Plan (LTCAAP) Proposed Submission consultation, which ends on 23 April 2012.

Drivers Jonas Deloitte has prepared these representations on behalf of Chesterhouse Properties (Lewisham) Limited (CPL). CPL has an interest in the site at Thurston Road Industrial Estate, Thurston Road, London.

Planning permission for the following development was granted by London Borough of Lewisham on 27 March 2012:

"The extension of time limit for implementation of the planning permission dated 26 February 2008 (ref: DC/07/65251) for the construction of a 2 to 17 storey building incorporating balconies/terraces on the site on site of Thurston Road Industrial Estate, Jerrard Street SE13, comprising non-food retail space (Use Class A1) (up to a total of 6771sq.m2), flexible retail/commercial/live/work units (Use Class A1/ A2/B1 up to 9 Units totalling 839sq.m2) 406 dwellings comprising 108 one-bedroom, 256 two-bedroom and 42 three-bedroom self-contained flats/maisonettes, together with associated landscaping, provision of a delivery yard, loading bay, stores, bin stores, 415 cycle, 4 motorcycle and 235 car parking spaces, comprising 117 retail spaces and 118 residential spaces on ground and upper ground floor levels, with courtyard garden above, associated highway works, plant and servicing"

These representations are made in the context of this proposed development.

The National Planning Policy Framework

CPL notes the publication of the National Planning Policy Framework (NPPF) on Tuesday 27 March. CPL acknowledges that the draft LTCAAP was published for consultation prior to the publication of the NPPF, and anticipates that the next draft of the document will incorporate its recommendations, where relevant.

Specific Comments

The Vision

CPL is supportive of the vision for the town centre, and considers that the consented mixed-use development at Thurston Road Industrial Estate makes a significant contribution to these key objectives. In particular, the Thurston Road development provides a development of high quality design, new vehicular and pedestrian/cycle access, and high quality new commercial, retail and residential development.

The Objectives

CPL supports the proposed objectives as a means of delivering the vision. Of particular note, CPL recognises that the development will make a significant contribution towards the implementation and delivery of the vision and objectives.

Objective 1 – Retail and Town Centre Status

CPL supports the continued inclusion of the Site within the Lewisham Town Centre boundary. In the context of this, CPL considers that the Site's contribution of up to 7,610sq.m. retail floorspace in the near future will make a significant contribution towards the identified delivery of 40,000sq.m. additional retail floorspace to 2026 and in helping Lewisham town centre to work towards achieving "metropolitan centre" status.

Objective 2 – Housing

CPL supports the objective of delivering additional housing within the town centre. The development at Thurston Road proposes 406 dwellings and has the potential to make a significant contribution towards Lewisham's target of 2,300 new homes in the town centre by 2016 and a further 800 new homes by 2021. The Site alone will contribute almost 18% of the target to 2016 and 13% of the total target to 2021. CPL notes that this delivery will be particularly important given the provisions made by the NPPF for each authority to deliver its housing target plus at least 5% over-provision.

Objective 3 – Design Quality

CPL supports the objective of achieving high quality design in new developments within the town centre, and considers that the approved proposed development at Thurston Road sets a high standard of design.

Objective 4 – Employment and Training

CPL supports the documents' emphasis on the provision of job opportunities, and notes that the commercial/retail floorspace proposed as part of the Thurston Road development will provide considerable new job opportunities in line with this, and will make a monetary contribution as part of the now signed Section 106 Agreement.

Objective 5 – Open space and recreation

CPL notes the need for quality open space and recreation space to be delivered as part of the town centre's development. CPL notes that the proposed development at Thurston Road will deliver open space and children's playspace for residents of the scheme.

Objective 6 – Transport

CPL appreciates the importance of new development in the town centre being well connected by different modes of transport, particularly public transport, cycling and walking. A considerable number of cycle parking spaces are proposed within the development, connecting well with the proposed cycle super highway along Loampit Vale.

Objective 7 – Environment

CPL recognises the need for developments to ensure that they mitigate any environmental impacts. Indeed, it is noted that the Thurston Road planning application was supported by an extensive Environmental Impact Assessment. Additionally, the development makes provision for renewable energy generation through a Combined Heat and Power (CHP) system.

Objective 8 – Community

CPL acknowledges that there is a need for new developments to subsidise the provision of new social infrastructure for new and existing residents of the area. Indeed, significant contributions towards education and town centre improvements are proposed.

Objective 9 – Implementation and Monitoring

CPL considers that overall, the mix and scale of uses proposed at Thurston Road will make a significant contribution towards the delivery of priorities identified in the LTCAAP.

Chapter 3 – The Spatial Strategy

Policy LAAP1: Town Centre Boundary

CPL welcomes the continued inclusion of the Site within the Lewisham Town Centre boundary, as depicted in Figure 3.1 (Page 23) of the draft LTCAAP. CPL considers that the Site has an important role to play in the future development of the town centre.

CPL notes the Site's identification within the Loampit Vale Town Centre Area.

Policy LAAP2: Town Centre spatial strategy

CPL welcomes the priorities set out in this policy and agrees that new development proposals should be set in the context of the surrounding area and the wider LTCAAP vision.

Chapter 4 – Town Centre Areas and Sites

Policy LAAP4 – Loampit Vale Town Centre Area (LVTCA)

CPL notes that the LVTCA is designated for mixed-use development, and is envisaged to complement the Lewisham Gateway Town Centre Area.

In respect of part a) of the policy, CPL notes that uses located on ground, and in some cases first, floors should comprise retail (A1/A2/A3), business (B1) and community (D1, D2) uses. Indeed, CPL has sought to achieve this on the Thurston Road site. The planning permission allows for open A1 non-food retail; there is no restriction for the sale of bulky goods only. However, CPL considers it inappropriate to restrict the conversion of comparison retail provision to convenience retail provision.

CPL has reviewed part a) in the context of the findings of the Lewisham Retail Capacity Study (2009). It is noted that there is anticipated to be capacity for 1,123 sq.m. convenience floorspace up to 2014. The projected capacity subsequently reduces to 531 sq.m. to 2019 as a result of anticipated commitments. The capacity anticipated to 2025 is 5,164sq.m. The two main retail commitments for the period to 2014 include an extension to the existing Tesco store at Conington Road (edge of centre), and new convenience retail within Lewisham Shopping Centre (in centre). We understand that Tesco is due to submit an application in the near future. However, we are not aware of any imminent proposals for convenience retail development at Lewisham Shopping Centre. Given the uncertainty of these proposals coming forward, we would question whether this will be delivered to meet demand to 2014.

The Lewisham Shopping Centre forms part of the Primary Shopping Area. As such, any proposals for retail (comparison or convenience) floorspace would not be subject to the sequential and impact tests set out in the NPPF, provided that it could be demonstrated to be an appropriate scale for the centre. Given the uncertainty on the delivery of this floorspace, the Council should seek to direct the identified need to the most sequentially preferable locations available and suitable at the time.

As written, it is CPL's view that the policy wording does not provide sufficient flexibility for other sites to meet demand for convenience retail floorspace in the short to medium term, should the currently identified sites not be delivered within the specified time period. Such flexibility is particularly appropriate given current market and trading conditions, and given the close proximity of the LVTCA to the Primary and Secondary Shopping Areas, and its location within the town centre. This would allow development to come forward on sites such as Thurston Road, which would be sequentially preferable to sites further from Lewisham Town Centre for convenience retail development.

Indeed, CPL is mindful of the need to ensure future flexibility on such sites in order to respond to future market conditions and demand and does not consider that this element of the policy offers sufficient flexibility to developers and future occupiers. More flexibility in this policy would help to ensure that the Site is appealing to a range of occupiers under different market conditions to ensure that commercial/retail development and subsequent job creation is facilitated. CPL therefore considers that London Borough of Lewisham should reconsider the appropriateness of the wording of this policy.

CPL welcomes the provisions of parts 2 and 3 of the draft policy and considers that proposals for the Site work towards achieving these aims, including in respect of flood risk mitigation.

CPL notes that the Site is designated as site *S4: Loampit Vale north west of Jerrard Street* within the draft Policy. CPL notes the specific provisions made for the site in respect of the aspect of development, amenity space, daylight, sunlight and overshadowing. Proposals for the site were fully informed by an Environmental Impact Assessment. This ensured that they took account of microclimatic effects and townscape issues.

Chapter 5 – Area-Wide Policies

As CPL has recently secured planning permission for an extension to the time limit for its proposals at Thurston Road, we do not dwell here on specific policies on topics such as design, transport and social

infrastructure, as these have already been addressed by the planning application. We have therefore focused on those policies which are most likely to affect the future function, vitality and viability of the Site.

Employment

Policy LAAP9 – Growing the Local Economy

Policy LAAP10 – Mixed Use

Policy LAAP11 – Employment Uses

CPL welcomes the priorities of the policy to grow the local economy, and to ensure that new developments incorporate a mix of uses including employment uses. It considers that the significant amount of employment floorspace and the mix of uses proposed at the Thurston Road site have the potential to contribute extensively towards these policy priorities.

Shopping

Policy LAAP14 – Town Centre Vitality and Viability

CPL agrees that town centre vitality and viability should be a key priority and can be achieved in a number of different ways. CPL would add to these provisions that flexibility in the nature of retail floorspace permitted within developments, whether it is occupied by convenience or comparison retailers. This would afford landlords greater flexibility in the identification of appropriate retailers, and would provide flexibility to respond to prevailing market conditions and demands. It is noted that policy flexibility to encourage vitality and viability of town centres is encouraged in the NPPF. In this context, please also note CPL's comments under Policy LAAP4.

Policy LAAP16 – Retail Areas

CPL acknowledges that part 5 of the policy, which relates specifically to the different town centre areas, suggests that the areas should contribute individually and collectively towards the vitality and viability of the town centre. CPL considers that the Site has a considerable role to play in the LVTCA.

CPL welcomes the opportunity to comment on the Lewisham LDF. CPL requests to be kept informed of progress with this and other documents and to be notified of future consultations. CPL also wishes to be given the option of appearing at the LTCAAP examination in due course.

Should you have any queries on the above comments, please contact either me or my colleague Julia Krause on 020 7303 3744 or jkrause@djdeloitte.co.uk.

Yours faithfully



Andrew Gale

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CC: Richard Ashford: Ashford Developments