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Dear Matthew

Representations on the Draft Lewisham Town Centre Area Action Plan

On behalf of our client, Land Securities we submit for formal consideration, the following representations in relation to the Lewisham Town Centre Area Action Plan DPD proposed submission draft.

To provide some background Land Securities own the freehold interest in the Lewisham Shopping Centre which lies at the heart of Lewisham town centre and provides the majority of the available retail space in this location. Land Securities have owned the shopping centre for a number of years and played an active role in Lewisham town centre. Their investment in Lewisham is significant and as such are key stakeholders in its future, and wish to continue to develop a partnering relationship with the Council to ensure the future long term success and growth of the town centre.

In this context, Land Securities supports and encourages the Council 's overall objective to formulate a specific policy framework for the future growth and protection of Lewisham Town Centre. They also acknowledge the ongoing engagement and dialogue with Council officers, to ensure that their views can be taken into account in this process.

In order to secure, maintain and improve Lewisham Town Centre's retail offer and ranking, it is vital that the shopping centre continues to form the main retail focus in the town, and that its ability to continue to operate as a well tenanted, well maintained centre is protected, and not eroded by other non-complimentary retail developments within the town centre.

The key retail aim set out in the Core Strategy and reflected in the vision for the Area Action Plan, is to enhance Lewisham Town Centre's position in the retail hierarchy to a metropolitan centre by delivering up to 40,000 sqm of new retail floorspace. Land Securities support this overall objective, but would wish to ensure that any new retail site allocations are subject to sequential testing and other planning tests that the role of the shopping centre within the town centre is protected and enhanced

In light of the NPPF and the lack of any up-to-date development plan criteria-based retail policies, the AAP should take the opportunity to ensure that any new retail provision beyond the defined primary shopping area is subject to the relevant tests to ensure that the viability of the existing centre is protected. This is particularly relevant in circumstances where the impact of the committed Gateway Scheme on the existing town centre remains unclear.

As a general comment we would query the individual site allocations for new retail provision proposed within the AAP. It is not clear from the document how the quantum of these individual allocations were arrived at and there appears to be some inconsistency between the published evidence base, the Core Strategy

objective to provide an additional 40,000sqm of retail, and the aggregate of the allocations as set out in the Draft AAP.

We comment below on specific sections and policies contained within the draft document which are of particular interest/concern for Land Securities.

Section 3 – The spatial strategy (Figures 3.4 – 3.6)

As you will be aware, Land Securities are currently progressing with a specific proposal for the extension and improvement of the northern end of the shopping centre. This will involve the incorporation of the Riverdale Hall into the shopping frontage and creation of a new retail unit, alongside the provision of new A3 units and a new cinema within the existing upper floors. This proposal will significantly strengthen and enhance the northern end of the shopping centre and provide much needed additional, high quality retail space, as well as evening economy uses within the central area.

The configuration of buildings and landownership and the viability of this proposal mean that there are limited ways of delivering this extension. Whilst Land Securities support the general objectives illustrated in figures 3.4 – 3.6 they wish to ensure that it is made clear in the document that these plans are purely indicative and aspirational and that suitable alternatives would be acceptable. This is particularly relevant with regard to the interface between the shopping centre and the Gateway site, the location of key public spaces, and the number and location of pedestrian routes through the shopping centre.

Section 4.1 – The Lewisham Gateway Town Centre Area

Land Securities supports the Council's aspirations to see the delivery of the proposed Lewisham Gateway development to include an expansion of the retail provision within the town centre, provided it is complimentary to the Shopping Centre and does not impact on the vitality and viability of the existing centre.

In the fourth paragraph of the Overview section, Land Securities would seek to insert the words '*seek to*' in the following context '*The Lewisham Gateway Town Centre Area will **seek to** deliver the following.....*'

Section 4.2 – Loampit Vale Town Centre Area.

Land Securities supports the development of the Loampit Vale area to provide a sense of arrival to the Town Centre. They consider, however, that it is of key importance to the future of the Lewisham shopping centre and the overall strength of the town centre retail core that any retail development and/or allocations within the Loampit Vale area do not endanger the viability, vitality and focus of the shopping centre and the Central Area more generally.

Within the overview it should be emphasised that this is an edge of centre location that is disconnected from the core town centre area by road and rail infrastructure and by natural features.

Land Securities support the key objective that this area should complement the Lewisham Gateway development but this objective should be adjusted to state that any development within the Loampit Vale area should be complementary to the Primary Shopping Area, which would ensure the protection of the Shopping Centre. In addition this objective should specify what would be complementary to the primary shopping area – for example, any retail provision should be restricted to additional bulky goods retailing rather than convenience or fashion retailing which would be in direct competition with the primary shopping area.

Policy LAAP4: Loampit Vale Town Centre Area

Loampit Vale Town Centre Area (LVTCA) is located in excess of 300 metres from the nearest designated primary shopping area (as shown on Figure 5.1 Retail Areas) and is therefore out of centre in national planning policy terms. Given Land Securities interest in the Lewisham Shopping Centre, as an integral and majority part of the designated primary shopping area and therefore the preferred location for retail

development, they have some concerns over the allocation of over 11,000 sqm of additional retail floorspace in a location that is poorly connected with the main retail areas and dependent on the realisation of other development opportunities to improve this connection.

The Core Strategy evidence base (NLP Retail Capacity Study 2009 – ‘the NLP study’) explicitly recommends that new retail development should be focused in Lewisham town centre, most specifically on the shopping core and non-core areas. The allocation of a site, that is at present remote from the core shopping area, for potentially unfettered retail floorspace is considered contrary to the NPPF direction to recognise the primacy of town centres and ‘pursue policies to support their vitality and viability’ (para. 23). Indeed, the NLP study goes on to state that:

‘Reconfiguration or expansion of the Lewisham Shopping Centre to provide additional retail floorspace and increase the quality of existing floorspace is the only other option, at the current time, that offers the potential to significantly enhance the retail offer within the Town Centre and any proposals which achieve this aim should be supported’ (para. 7.23)

This recommendation is reflected in the allocation of a further 27,000 sqm within the central and Lewisham Gateway areas. In order to ensure the deliverability of this objective, it is considered essential to require that any main town centre uses proposed at Loampit Vale are obliged by Lewisham Town Centre AAP policy LAAP4 to demonstrate compliance to the NPPF tests of sequential and impact to ensure the continued vitality and viability of Lewisham town centre. This does not preclude any of the requirements for Lewisham town centre as set out in Core Strategy Spatial Policy 2 from being realised.

In accordance with the NPPF, any application for additional retail development in an out-of-centre location must comply with the sequential approach under paragraph 24 and, if over 2,500 sqm gross, demonstrate that there will be no significantly adverse impacts arising under paragraph 26. Whilst the sentiments of ‘complementing’ the current retail offer as set out in the current wording are appreciated, this would carry little weight in the consideration of any application for additional retail floorspace. Only by requiring a full test of impact on Lewisham town centre can this be secured and without such amendment, we consider the current wording of the policy could prejudice planned investment in the centre and threaten its vitality and viability.

As such, we suggest that Policy LAAP4 is amended as follows:

1. The Loampit Vale Town Centre Area is designated for mixed-use development. All proposals will be required to complement the Lewisham Gateway Town Centre Area, as follows:

- (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. Conversion of comparison retail provision to convenience retail provision will not be considered acceptable. Any application comprising main town centre uses as defined in the NPPF will be required to comply with the sequential approach to site selection and include an assessment to demonstrate that there will be no adverse impacts arising on town centre vitality and viability.*

Under sub-heading ‘S3a and 3b Loampit Vale north east of Jerrard St’, point 8 (*‘Ground floor retail units should improve the comparison offer within the town centre’*) should be removed. In light of the location of the Loampit Vale Town Centre Area as out-of-centre in retail planning terms, it is nonsensical that retail units in this location would be capable of improving the comparison offer within the town centre. The site remains out-of-centre and any development comprising main town centre uses must demonstrate compliance with the tests of national policy.

Under sub-heading ‘S5 Railway Strip’, it is unclear what uses are regarded as constituting ‘commercial’. In light of the above comments on main town centre uses, this should be clarified. In addition there appears to be a typographical error as highlighted below:

'11. This site is considered most appropriate for a commercial lead mix of uses, although sensitive design could make some residential acceptable.'

Section 4.3 – Connington Road Town Centre Area

The overview for the Connington Road Town Centre Area recognises it as an edge of centre location and refers to the possible expansion of the existing Tesco supermarket on the site, and correspondingly the text provides for an additional 3,000 sqm of retail floorspace alongside 400 new homes. As set out in earlier in this letter, Land Securities would query the origin of the specific quantum of the allocation, in the context of the published evidence base. In addition the wording states that the area is edge of centre, whereas in NPPF terms it would be classified as out of centre being in excess of 300m from the primary shopping area. The text should therefore be amended be consistent with the NPPF.

A key objective for this area is stated as *'to provide retail services for the Borough's residents suitable for an edge of town centre location that supplements those contained in the Central Area.'* The overview for this area makes it clear that the intention in allowing retail development on this site is to facilitate the possible expansion of the Tesco store. The above objective should therefore be reworded to specifically restrict any retail services to an extension of the existing foodstore rather than to any other form of retail development. We suggest some revised wording below;

'Provide retail services for the Borough's residents in the form of an extension to the existing foodstore, suitable for an edge of town centre location that supplements those contained in the Central Area.'

Policy LAAP5 – Connington Road Town Centre Area

Similarly to Loampit Vale Town Centre Area, Connington Road is located in excess of 300m from the primary shopping area and is therefore considered out of centre in national planning policy terms. For the same reasons as set out under Policy LAAP4 above, Land Securities have some significant concerns over the allocation of 3,000 sqm of additional open A1 retail floorspace provision.

The objective of the AAP appears to be to provide for the expansion of the Tesco supermarket, however policy LAAP5 would potentially allow for any configuration of standalone retail unit up to 3,000 sqm which would compete with the Primary shopping area and be inappropriate in an out of centre location such as this, if untested.

As set out under LAAP4 any application for additional retail space in an out-of-centre location must comply with the sequential approach under paragraph 24 of the NPPF. Again, therefore, Land Securities would argue that the current wording of policy LAAP5 could prejudice the future vitality and viability of the Lewisham Shopping Centre and primary shopping area.

As such we suggest that policy LAAP5 is amended as follows:

S6 Tesco block, car park and petrol station

2. Development involving underground parking, retail foodstore extension (up to 3,000 sqm additional floorspace) that complements the current town centre offer and residential development on this site will be satisfactory providing it will respond to the following principles:

- a) Any application for additional retail development comprising main town centre uses as defined in the NPPF will be required to comply with the sequential approach to site selection and include an assessment to demonstrate that there will be no adverse impacts arising on town centre vitality and viability.*
- b) Due to the complex nature of this site applicants should provide a masterplan across the site.'*

Section 4.6 – Central Town Centre Area

Land Securities support the general principles set out within the overview and the majority of the key area objectives for the Central Area.

Within Policy LAAP8 Lewisham Centre Town Centre Area, at point (a) there is a key principle identified 'to ensure every opportunity is taken to improve the number and nature of the east-west connections across the Lewisham Shopping Centre area.' It is imperative for the future viability of the retail space within the centre that Land Securities are able to manage the retail circuit appropriately to protect and preserve footfall through the centre and along its key retail frontages. This policy objective has the potential to prejudice this ability, increasing permeability through new or differently configured entrances could have a significant impact on footfall and therefore on the attractiveness to retailers of certain units within the centre. We would therefore suggest that this objective is amended as follows:

'As the Lewisham Centre is managed, refurbished and redeveloped over time, east-west connections across the Shopping Centre area should be improved where appropriate in the context of the centre's management plan and the protection of the retail circuit and pedestrian footfall.'

The two specific sites identified in policy LAAP8 are incorrectly numbered and this should be amended to reflect the numbering in figure 3.3.

S9 (which should be amended to read S10) Land south of the Lewisham Shopping Centre. The policy wording for this site at point (a) should be expanded to include community uses and health on the ground floor to reflect the need for these uses within the town centre and the options being explored by Land Securities. IN addition given that there is more than one landowner within this site the requirement for comprehensive redevelopment may hinder the delivery of any development as it would require land assembly to achieve. Therefore we strongly suggest that this is reworded to allow for the development of individual sites in a phased manner, provided this is undertaken in the context of a masterplan for the entire site.

At point (b) the wording should be adjusted as follows *'The redevelopment should mark the beginning of the commercial and retail heart of Lewisham Town Centre, while respecting the height, mass and bulk of local surroundings. It should create a sense of arrival and should enhance and support the southern end of the high street to encourage pedestrians to travel the full length of the high street.'*

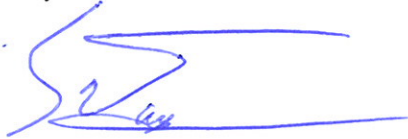
Section 5 – Area-wide policies

In Figure 5.1, the retail areas are identified. The primary shopping area encompasses the entire Lewisham Shopping Centre but excludes the existing Riverdale Hall which whilst not currently occupied as retail space, is within the centre and forms one side of the main northern entrance mall. Excluding this unit from the primary shopping frontage is inconsistent in the context of the rest of the shopping centre and this plan should be amended to ensure a consistent approach across the centre. The Riverdale Hall should be designated as primary shopping frontage on figure 5.1, or if the Council wish to maintain a distinction between this currently vacant unit and the rest of the shopping centre then it should be designated specifically as 'future primary shopping frontage'.

We trust the above comments are useful suggested amendments to the policy document which reflect Land Securities long term commitment to enhancing and improving Lewisham town centre. This must start from the position of protecting and enhancing the role of the shopping centre itself. We trust that these comments will be considered and taken into account in the redrafting of this important policy document.

We would be more than happy to discuss any of the above in more detail.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'S Taylor', with a long horizontal line extending to the right.

Simon Taylor
Planning Associate Director

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CC: Land Securities