

Public Examination of Lewisham Town Centre Local Plan

London Borough of Lewisham response on the Inspector’s Initial Question 6: Retail capacity and its distribution among sites.

Note the full text of the Inspector’s questions are on the Examination website and can be accessed via the following link:

<http://www.lewisham.gov.uk/myservices/planning/policy/Documents/TC%20Inspector%27s%20queries.pdf>

Planning Policy - 23rd November 2012

Council Response

1. Question 6 – Part (a)

- 1.1 The following paragraphs and data set out the evidence to demonstrate that the LTCLP aim to provide 47,550sqm of additional retail floorspace by 2026 is supported by the clear, convincing and proportionate evidence in the Retail Capacity Study (RCS).
- 1.2 The RCS, 2009 (CSD2.14) shows the capacity for new retail development in the borough of Lewisham until 2025 (page 69). Table 6.3 in the RCS details the gross capacity identified for convenience and comparison floorspace in the borough for the same period. This table is summarised as Figure 1.

Figure 1: Retail capacity in Lewisham Borough in 2025

Comparison retail / sqm	Non-comparison retail / sqm	Total retail / sqm
51,577	16,980	68,557

- 1.3 The RCS states that the majority of the required new floorspace should be delivered in Lewisham town centre (para 7.23), with additional minor support for expansion of Catford town centre and the permitted planning permission for the Bell Green out-of-centre site.
- 1.4 The submitted LTCLP proposes to deliver 47,550sqm new retail provision (MM7 in the library document LTCLP1.7 Schedule of recommended main modifications to the LTCLP) in Lewisham town centre as demonstrated in Figure 2, in addition to the existing retail floorspace of 80,000 sqm (para 5.81 of the RCS). This equates to an increase in retail floorspace of just under 60% compared to the base provision of 80,000 sqm set out in the RCS.

Figure 2: Proposed retail provision in the LTCLP

Comparison retail / sqm	Non-comparison retail / sqm	Total retail / sqm
35,100	12,450	47,550

- 1.5 The total proposed retail provision for Lewisham town centre equates to 69.4% of the boroughwide capacity identified by the RCS. This is clearly a majority of the capacity identified in the RCS and is in the opinion of the Council justified both on capacity grounds and on the policy objective to make Lewisham town centre a Metropolitan centre in the London retail hierarchy. Additionally, the London Plan identifies Lewisham town centre as being suitable for high growth, while Catford town centre and the district town centres in Lewisham are all categorised as being suitable for either medium or low growth (LP Table A2.1 from page 280 onwards). Given this policy approach, the RCS (para 7.23) appropriately designates Lewisham town centre as the location where the majority of new retail development should be located in the plan period.
- 1.6 It is anticipated that the remaining retail floorspace across the borough (of approximately 21,000sqm) will be made up by the granted planning permission for the Bell Green site and the emerging plans for Catford town centre (The Council is preparing a further options Local Plan). While normal change is anticipated in the other district and local shopping centres these are expected to be small scale gains and losses with no significant expansion planned.
- 1.7 The Council does not have exact information on future retail floorspace delivery in Catford town centre, however current discussions regarding the emerging Catford town centre Local Plan (further options version) suggest this will be below previous estimations.
- 1.8 The Council are continually monitoring the actual and expected delivery of retail provision in the borough. Under current circumstances, it is anticipated that the total new retail provision from Lewisham town centre, Catford town centre, the Bell Green site (and the rest of the borough) in the plan period, could exceed the total capacity identified in the RCS. However, it is expected that any excess, would be no more than between 5% and 10%. A variation of 5% is relatively small and equates to less than 3,500 sqm and the Council believes that minor fluctuations in the quantum of delivery, on a borough-wide basis are to be expected, given the plan period of 15 years.
- 1.9 The NPPF (para 14) states that Local Plans should contain flexibility, ensuring the sites they plan for are deliverable and this is the case for both the Lewisham and Catford town centre Local Plans. During the production of the plan for Lewisham town centre there has been an increase in the proposed delivery of retail floorspace in the plan period. However, on a borough-wide basis, this has mostly been balanced by a decrease in the anticipated delivery of retail in Catford town centre.
- 1.10 The LTCLP has a flexible and deliverable approach to retail development that is aligned with the Core Strategy retail strategy and the evidence in the RCS. In accordance with the “Plan-Monitor-Manage” approach outlined in the Core Strategy (CSD1.5, page 9), the LTCLP outlines a monitoring framework in Section 6.2 and as part of the Delivery Strategy and Monitoring Framework in Appendix 3 of the plan. Should it become apparent through monitoring that the delivery of retail floorspace is not proceeding as is appropriate, to either the detriment of the town centre or the borough-wide retail strategy, required action will be taken in accordance with Section 6.3 of the LTCLP regarding risk and contingency to manage the situation.

- 1.11 The Council will commence a review of the RCS in 2013, in line with the recommendation in Section 7 the 2009 RCS and undertake any subsequent review of the current retail strategy and policies in the Core Strategy, the LTCLP and any other Local Plan should it be required.
- 1.12 In summary, the LTCLP proposes to deliver an appropriate quantum of both comparison and non-comparison retail floorspace when compared to both the current boroughwide proposals and the RCS evidence base document.

2 Question 6 – Part (b)

- 2.1 The following paragraphs detail evidence to demonstrate that an appropriate audit trail exists for:
- the selection of appropriate locations (town centres) in the borough for the provision of new retail floorspace,
 - the selection of sites in Lewisham town centre where new floorspace is to be delivered, and
 - the assignment of indicative capacities to each site.
- 2.2 Additionally, evidence is provided to demonstrate why the recent proposal for the extension of Lewisham Shopping Centre has not raised the need for a reassessment of this evidence.

Selection of appropriate locations

- 2.3 The NPPF (Paras 23 and 24) and the London Plan (Policy 4.7) require that retail development is focused on existing town centres and not in out of centre locations. The London Plan (Annex 2) then classifies each of the major and district town centres in the Borough of Lewisham according to their potential for growth. Lewisham town centre is categorised as being suitable for high growth, while Catford town centre and the district town centres are categorised as being suitable for either medium or low growth (LP Table A2.1 from page 280 onwards). Given this policy approach, the RCS (para 7.23) appropriately designates Lewisham town centre as the location where the majority of new retail development should be located in the plan period.

Selection of sites

- 2.4 Paragraphs 6.10 – 6.20 of the RCS detail the process by which the appropriate sites for assessment in the borough's town centres were selected. Following the sequential test approach the consultants (paragraph 6.10 of the RCS) "only looked at in centre and edge of centre sites as defined in retail terms". This resulted in 59 sites being selected for analysis boroughwide. From this total 19 were located in Lewisham town centre. Plan 1 (located after the appendices of the RCS) details the results of the analysis of the 19 sites, resulting in nine of the sites being identified as potential sites for either new or extended retail provision.

- 2.5 The factors used by the consultants to assess the identified sites are set out in paragraph 6.14 of the RCS. Further details regarding the analysis of each site are available in Table 6.2 of the RCS.
- 2.6 Those sites included in the submitted LTCLP match those sites identified in the RCS with the exception of two additions:
- Ladywell Leisure Centre site has become a deliverable site due to the imminent completion of the replacement leisure centre in Loampit Vale. Analysis of the site prior to the Further Options version of the LTCLP found it has the capacity to provide up to a maximum of 1,400 sqm of retail floorspace (most likely non-comparison). This is evidenced in the Briefing note addendum to the RCS (CSD2.14b).
 - Pre-application discussions with the owners of the Lewisham Shopping Centre have demonstrated a number of extensions to the Shopping Centre to provide a small number of homes and an additional 10,000 sqm of retail floorspace. Proposals discussed include growth to the north, north-west and south of the existing shopping centre and are all considered realistically deliverable in the plan period.

Need for further sequential analysis

- 2.7 The indicative capacity for new retail floorspace on each of the sites in Lewisham town centre was assigned using information available on the sites through analysis of pre-application discussions and existing applications and permissions. Where such information was not available an industry standard approach was taken based upon the size of the site and potential ground floor footprint. Both approaches provide an appropriate indicative capacity for each site based on the individual site circumstances [note appendix F of the RCS does not detail indicative floorspace figures but does mention floorspace for commitments]
- 2.8 Table 6.3 of the RCS summarises the capacity for retail growth identified for the borough in 2025. This equates to the 68,557 sqm as shown in Figure 1 above. The proposed floorspace in the submitted LTCLP (47,550 sqm) does not exceed this figure and when considered in conjunction with proposed retail development elsewhere in the borough, it does not unreasonably exceed this figure. Therefore all of the sites identified in Lewisham town centre can be said to be contributing towards the delivery of the identified floorspace needs in the RCS.
- 2.9 Given the situation presented in paragraph 2.8, the Council did not consider it necessary to apply further sequential analysis to the identified sites in Lewisham town centre as, 1) they all contribute towards the delivery of retail need in the plan period, and 2) the Council anticipates the delivery of all of the sites in the plan period.

Impact of the proposed extension of the Lewisham Shopping Centre

- 2.10 As described in paragraph 2.6, the emergence of proposals for the extension of the Lewisham Shopping Centre lead to an increase in the indicative retail capacity of the Central Town Centre Area from 600sqm in the Further Options 2009 version, to 10,000sqm in the Proposed Submission 2012 version of the LTCLP. This increase has,

however, not caused the need for a reassessment of the sites available in Lewisham town centre further down the sequential chain. As shown in Section 1 of this paper, the additional site has not caused the proposed delivery of retail floorspace, boroughwide, to exceed the capacity stated in the RCS to any significant extent. The RCS states in paragraph 7.23 (CSD2.14) that Lewisham town centre should deliver the majority of new retail floorspace in the borough and both prior to and after the addition of the Lewisham Shopping Centre floorspace, this is true.

Summary

- 2.11 The sites proposed for retail development in the LTCLP have been selected using a clearly demonstrated evidence that utilised sequentially based analysis of both their location in relation to the town centre retail hierarchy and their location within Lewisham town centre. The emergence of proposals for the extension of the Lewisham Shopping Centre have not required any need for further sequential analysis.