

Public Examination of Lewisham Town Centre Local Plan

London Borough of Lewisham response on the Inspector's Initial Question 9 (Loampit Vale Town Centre Area).

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. Introduction

1.1 The Council acknowledge that the approach towards delivering retail in the Loampit Vale Town Centre Area (LVTCA) is not as clear as it could be. In order to rectify this, the Council propose a number of amendments to the plan as identified in this paper. The Council has not yet added the amendments proposed in this paper to a 'modifications schedule', but will do so if the Inspector considers it appropriate. For information, the Council consider that the required amendments are not a matter of soundness, but are to fix errors and for clarification, therefore they form 'additional modifications'.

2. LTCLP Paragraph 4.8

2.1 The LTCLP submission version paragraph 4.8 regarding Loampit Vale states that *"the Council will seek to retain the comparison retail provision in this edge of centre location to support the objective of becoming a metropolitan town centre"*. The Inspector has questioned whether this incorrectly gives the impression that the existing retail units should be retained? This is not the intention of the plan, rather the Council supports comprehensive redevelopment with considerable retail floorspace re-provided as part of any proposals. The Inspector's comment that *"the plan's actual intention seems to be to identify indicative potential capacity for increased (retail warehouse-type) capacity here"* is considered correct by the Council. In order to make the retail aim for the Loampit Vale area clear, amendments are proposed to paragraph 4.8 as shown in the box below.

2.2 Additionally, MM9 in 'LTCLP1.7 Schedule of recommended main modifications to the LTCLP' adds the sentence *"New retail provision should complement and not compete with the existing primary frontage"*. The Council propose to retain this recommended additional text, as it is appropriate in an introductory paragraph and clarification and further detail is provided by the amendments proposed to policy LAAP4 in this paper.

2.3 To reflect the changes identified above, the Council propose to amend paragraph 4.8 of the LTCLP as detailed in the box below (Note: It is proposed to add the **bold and underlined text** and delete the ~~strikethrough text~~).

4.8 **As part of any redevelopment of the area,** the Council will seek to ~~retain~~ **maximise** the **provision of** comparison retail ~~provision~~ **floor space** in this edge of centre location to support the objective of becoming a metropolitan town centre.

3. Policy LAAP4

3.1 Policy LAAP4 includes two references to the acceptable form of retail to be provided in the Loampit Vale area. Firstly the 'area-wide' policy LAAP4.1(a) states that "*Conversion of comparison retail provision to convenience provision will not be considered acceptable*" and secondly LAAP4.8 states specifically for Sites 3a and 3b that "*Ground floor retail units should improve the comparison offer within the town centre*". Additionally, 'area-wide' policy LAAP4.1 states that "*All proposals will be required to complement the Lewisham Gateway Town Centre Area*"

3.2 The Council propose a number of amendments in order to improve the clarity of policy LAAP4. As discussed in paragraph 2.1 of this paper, the intention of the policy is to encourage increased retail capacity for 'non-food bulky goods' retail in this location and in order to make this clear, it is proposed to adjust policy LAAP4.1(a) to specifically promote this retail use in this location, as demonstrated in the box below. It is important to note that the Council do not consider that this amendment affects the Sustainability Appraisal of the LTCLP.

Policy LAAP4.1(a) ~~Conversion of comparison retail provision to convenience provision will not be considered acceptable~~ **This area is considered appropriate for non-food retail for bulky goods, but will not be considered acceptable for convenience retail.**

3.3 In order to ensure that the adjusted policy LAAP4.1(a) is explained clearly in the LTCLP, the Council propose to add the following short paragraph into the 'Delivery context' for policy LAAP4 as a new paragraph 4.13. The additional text provides a definition of 'bulky goods' and states that planning officers may use conditions to restrict the type of use and also to restrict permitted use class changes under the use class order, to ensure that the desired retail type is retained in the future.

4.13 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.

3.4 Given the proposed adjustments to policy LAAP4.1(a), it is not considered necessary for policy LAAP4.8 to be retained as it is repetitious of policy LAAP4.1(a). Therefore, the Council propose to remove policy LAAP4.8 from the LTCLP as demonstrated in the box below.

Policy LAAP4.8	Ground floor retail units should improve the comparison offer within the town centre.
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3.5 The requirement in policy LAAP4.1 that “*All proposals will be required to complement the Lewisham Gateway Town Centre Area*” is not intended to refer to the delivery of retail. Rather its intention is to ensure that the scale and mass of development in the area is appropriate in the context of the permitted plans for Lewisham Gateway. However, the Council consider this to be repetitious of policy LAAP4.2(b) and therefore propose to remove it in order to improve the clarity of the policy. The proposed amendment is detailed in the box below. It is important to note that the Council do not consider that this amendment affects the Sustainability Appraisal of the LTCLP.

Policy LAAP4.1	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. <u>All proposals will be required to contribute to the realisation of the following principles.</u>
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4 Summary

4.1 The intention of policy LAAP4 is to encourage the re-provision of non-food bulky goods retail in this location as part of comprehensive redevelopment and the Council feels the amendments proposed in this paper now make this aim clear and consistent.

4.2 The introductory text (paragraph 4.8) recommended for addition by MM9 stating that “*new retail provision should complement and not compete with the existing Primary Frontage*” is to be retained and demonstrates clearly the retail aim of the area. The amendments proposed to policy LAAP4 mean it now concisely details how the retail aim of the area should be achieved, i.e. by delivering re-provision of non food bulky goods retail. The additional text proposed in paragraph 4.13 provides further detail of the mechanisms by which the outcomes detailed in paragraph 4.8 can be delivered.