

Public Examination of the Lewisham Development Management Local Plan

London Borough of Lewisham response to the Inspector's initial query regarding DM10: Local Employment Locations

LELs receive extensive policy guidance in Core Strategy policies 3 and 5 and the Site Allocations LP. What actual policy value is added by policy DM10? Does the additional policy content outweigh the burden imposed by making it necessary to seek for policy on LELs over 3 plans?

Why is it the case (para 2.97) that a non-fully fitted unit would 'not be considered deliverable or sustainable (and would be) unattractive to potential occupiers'? Is this a matter of estate management rather than planning? Would it not be equally advantageous and possibly more efficient/economic for an occupying company to be able to install internal fittings to its own specification?

The Council proposes an editorial change (SM1/SM4) to make DM10 consistent with CS3 concerning sui generis uses. This could be an appropriate OM.

(Note a complete list of all the Inspector's initial questions are on the Examination website and can be accessed via the following link:

<http://www.lewisham.gov.uk/myservices/planning/policy/LDF/development-policies/Documents/DMLPInitialQueries.pdf>)

Planning Policy – 13 January 2014

Council Response

- 1.1 The Council considers that Policy DM10 provides further policy detail that supports and implements the strategic policies in the Lewisham Core Strategy and the basic allocation for these uses in the Lewisham Site Allocations Local Plan. The detailed implementation of the policy on Local Employment Locations (LELs) was not considered a 'strategic issue' suitable for the Core Strategy. The format chosen for each site in the Lewisham Site Allocations document was very schematic and does not deal with detailed implementation.
- 1.2 The extra content in DM Policy 10 is intended to enable the implementation of the Core Strategy Policy by enabling the continuing functioning of these sites that support the local economy. The added policy content relates to policy on self-storage facilities (part 2 of DM10); flexible specification and fit out of new premises, (part 3 of DM10) and change of use to things like nurseries, churches and community facilities (part 4 of DM 10).

- 1.3 The Council wishes to maintain a supply of small business units to meet the main form of businesses represented in the borough as discussed in relation to the Council's response to the inspector's query on DM 9: Mixed Use Employment Locations. The LELs in Lewisham are small in size and number. The eleven locations have a total area of 16.89 ha, eight of these are less than 1.5 ha. and of these four are less than 1 ha. Only two are larger than 3 ha. Sites for these uses are therefore in short supply. Most of the sites supply a range of smaller good quality units that are identified as being in short supply by the Lewisham Employment Land Study 2008 (ELS) ([Submission Library Ref CSD2.6](#)).
- 1.4 The reason for clause 2 of DM 10 is that the Council was concerned about the number of applications for this use on LELs. Self-storage facilities are generally larger scale buildings which provide few employment opportunities. There are two recent instances where they have replaced popular small scale modern good quality business units on two Local Employment Locations. These were identified by the Lewisham ELS as being in relatively short supply and of importance to the economy of Lewisham. As stated above there are only eleven LELs identified in the borough and the loss of two for self-storage raised concerns.
- 1.5 The examples of self-storage are at:
1. Lewisham Way Local Employment Location: This involved the demolition of 7 out of 10 of the small industrial units at this location and its replacement by a four storey self-storage unit (Applications Ref DC/09/71479/X on http://planning.lewisham.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal= LEWIS_DCAPR_56673).
 2. Stanton Square Local Employment Location: This involved the demolition of the modern industrial buildings on the Stanton Square Industrial Estate and the construction of a four storey self-storage facility with separately lettable office space (Application Ref: DC/08/70032 on http://planning.lewisham.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal= LEWIS_DCAPR_55055).
- 1.6 In summary, clause 2 of Policy DM10 , has been included as these facilities provide very low numbers of jobs and have replaced popular small business units that are in demand and have a short supply. The Stanton Square self-storage facility was estimated to provide 5 jobs, although further employment opportunities would be provided by the lettable office space proposed. It should be noted that the new self-storage development on Stanton Square has not yet proceeded beyond the demolition of the former industrial units and the digging of foundations.
- 1.7 The reason for clause 3 of DM Policy 10 is to ensure that new applications for development on LELs avoid the pitfalls of providing unattractive space and seeks to ensure that what is provided is attractive in its context and provides a range of employment opportunities, is flexibly specified, functional and attractive to new

occupiers. It also seeks to ensure that by providing small business units a range of job opportunities is provided which is attractive to local residents.

- 1.8 The reason for clause 4 of Policy DM 10 is to set out clearly what change of use would be acceptable and unacceptable. The introduction of uses such as churches, and other leisure uses on these sites is not considered acceptable and this policy gives clear guidance for those wishing to make a planning application. The Council has had extensive experience of small churches in particular wishing to locate in relatively low cost premises in industrial areas.
- 1.9 The Inspector's second point about internal fit out of units is discussed in the Council's response to the Inspector's query on DM 9 Mixed Use Employment Locations. Points made in relation to Mixed Use Employment Locations are equally relevant to the Local Employment Locations. Again, although in paragraph 2.97 (second sentence) some detail is given as to what could be included within a 'full fit out' for new units as an example, it is not intended to be a definitive list. The inclusion of the requirement for a level of fit out beyond shell and core is intended to signal to a prospective developer that this will be required on a routine basis, and will need to be costed into any scheme as part of their viability work. This requirement provides some certainty for developers about build cost assumptions.
- 1.10 The Council has successfully negotiated provision for internal fit outs on a number of schemes in the borough which would be categorised as falling under Policy DM11 Other Employment Locations, and seeks this provision as a matter of routine.
- 1.11 Examples of schemes are at:
1. 52-54 Thurston Road SE13 has required a basic fit out of B1 office units to be provided as part of the S106 agreement. This is application no. DC/11/77754 to be found at http://planning.lewisham.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal= LEWIS_DCA PR_63727,
 2. Sherwood Court SE13 application No. DC/12/80762 to be found at http://planning.lewisham.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal= LEWIS_DCA PR_67094.
- 1.12 The Council agrees with the Inspector's view that the proposed changes SM1/SM4 could be appropriate OMs.
- 1.13 The Council suggests the addition of the following definition to the Glossary to help with the interpretation of this policy, and also DM9 Mixed use employment locations.

Glossary

Shell and Core: a commercial development where all internal finishes and services are left out, for provision by the tenant.