



Nathaniel Lichfield
and Partners

Planning Design Economics

**London Borough of
Lewisham**

Supplementary Report
to Lewisham Retail
Capacity Study 2009

23 September 2010

CL/11936/02/DL

Nathaniel Lichfield
and Partners
14 Regent's Wharf
All Saints Street
London N1 9RL

nlpplanning.com

© Nathaniel Lichfield & Partners Ltd 2010. Trading as Nathaniel Lichfield and Partners.

All Rights Reserved.

Registered Office:

14 Regent's Wharf

All Saints Street

London N1 9RL

All plans within this document produced by NLP are based upon Ordnance Survey mapping with the permission of Her Majesty's Stationery Office. © Crown Copyright reserved. Licence number AL50684A

Contents

1.0	Introduction	1
2.0	Policy Update Since 2009 LRCS	3
	National Planning Guidance	3
	Key Changes	3
	Development Management Policies	4
	Development Plan Context	5
3.0	Implications for 2010 Supplementary Report	7
	Validity of 2009 Data	7
4.0	Development Threshold	9
	Centres within LB Lewisham	9
5.0	Primary and Secondary Frontages	11
	Development Plan Context	11
	Methodological Approach	12
	Lewisham	13
	Catford	13
	Blackheath	14
	Deptford	15
	Downham	15
	Forest Hill	15
	New Cross/New Cross Gate	16
	Sydenham	16
	Lee Green	17
6.0	Conclusions	19

Appendices

Appendix 1	2010 Land Use Plan and Current UDP Designations - Lewisham
Appendix 2	2010 Land Use Plan and Current UDP Designations - Catford
Appendix 3	2010 Land Use Plan and Current UDP Designations - Blackheath
Appendix 4	2010 Land Use Plan and Current UDP Designations - Deptford
Appendix 5	2010 Land Use Plan and Current UDP Designations - Downham
Appendix 6	2010 Land Use Plan and Current UDP Designations - Forest Hill
Appendix 7	2010 Land Use Plan and Current UDP Designations - Lee Green
Appendix 8	2010 Land Use Plan and Current UDP Designations - New Cross
Appendix 9	2010 Land Use Plan and Current UDP Designations - Sydenham

1.0 Introduction

- 1.1 The Lewisham Retail Capacity Study (LRCS), prepared by Nathaniel Lichfield and Partners (NLP), was published in November 2009. Subsequently LB Lewisham prepared a brief highlighting additional work they wished to be undertaken in preparing a Supplementary Report. In essence this seeks:
- Guidance on the continuing validity of the 2009 Retail Study in the context of both (1) advice on development plan preparation subsequently published by the DCLG within PPS4 (December 2009) as well as (2) any changes in the base data/other assumptions; and
 - An updated analysis of the land uses and recommendations on the appropriate Primary and Secondary (Core and Non Core) Areas within each of the nine defined Town and District Centres in the Borough.
- 1.2 This Supplementary Report responds to this brief. Specifically, Section 2.0 of this report summarises relevant planning policy published since November 2009. This is principally the relevant guidance within PPS4 (specifically on guiding the preparation of the evidence base to underpin Development Plan Documents). We have also had regard to other development plan documents which have been published since November 2009.
- 1.3 Section 3.0 draws on this updated Planning Policy analysis, and our assessment of the continuing validity of the data sources underpinning the LRCS (and whether these are out of date) to scope the extent of work required within this Supplementary Report.
- 1.4 Section 4.0 of the report reviews the planning policy context (and guidance) on establishing “*development thresholds*”. This is in a context where retail and leisure proposals above such thresholds should be required to undertake assessments to accompany the planning applications.
- 1.5 In Section 5.0 of the report we briefly summarise planning policy and guidance on primary and secondary retail frontages and set out the methodology of our land use survey of the nine main centres in the borough. We then go on to review the current extent of these primary and secondary areas within each centre and whether any revisions are appropriate to these.
- 1.6 Our overall conclusions are in section 6.0 and a number of land use plans are attached as appendices.

2.0 Policy Update Since 2009 LRCS

- 2.1 The 2009 LRCS contains a full summary of planning policy at National and Development Plan level.

National Planning Guidance

- 2.2 Subsequently PPS4: Planning for Sustainable Economic Growth was published on 19 December 2009. This was shortly after publication of the LRCS (albeit the latter had regard to then draft PPS4).
- 2.3 PPS4 replaces previous Government guidance on Retail and Town Centre Development (i.e. PPS6 as well as PPG4, PPG5 and parts of PPS7 and PPG13). PPS4 places retail and town centre development in a wider context as “*economic development*” that contributes to the Government’s overarching objective of “*sustainable economic growth*”.
- 2.4 Primarily, it provides a more succinct statement of economic development policy including town centre and retail policy in both urban and rural areas. Additional guidance on interpreting retail policy issues is contained within the accompanying Practice Guide.
- 2.5 We summarise below the key policy guidance within PPS4 focussing on changes with PPS6 and advice on development plan preparation.

Key Changes

- 2.6 In summary, PPS4 removes the “*need*” test for the determination of planning applications. In future, applications should be determined on the basis of compliance with the sequential approach (policy EC15) and a revised “*impact*” assessment, some of which will apply to all forms of economic development (policies EC10 and EC16), whilst others will be specific to town centre and retail uses.
- 2.7 It excludes any specific proposals for a “*competition test*”. The Government response to the final Competition Commission recommendation will be issued separately.
- 2.8 There are a number of changes in the wording of policies which clarify the Government’s approach and support for town centres, these are summarised below.

Plan Making Policies

- 2.9 As in PPS6 there is considerable emphasis on the plan led approach and the need to base planning policies on a robust evidence base. PPS4 clearly sets out what is required of planning authorities (policies EC2 to EC5).

- 2.10 The ‘need’ assessment remains part of the required inputs for development plan making, and specifically qualitative need requires a consideration of the provision and distribution of services, and whether there is a need to increase competition and retail mix. Local planning authorities are required to:
- 1 Identify deficiencies in the provision of local convenience shopping and other facilities which serve people’s day-to-day needs;
 - 2 Give additional weight to qualitative deficiencies in deprived areas. This could include promoting centres to a higher level of the retail hierarchy or designating new centres, where appropriate. However, the needs of deprived areas should only be given preference when considered against alternative sites with similar location characteristics, and any benefits in respect of regeneration or employment, should only be material considerations in the site selection process;
 - 3 Set flexible policies for their centres to respond to changing economic circumstances;
 - 4 Encourage residential or office uses above ground floor town centre uses within centres, ensuring housing in out-of-centre developments is not, in itself, used to justify additional floorspace in such locations;
 - 5 Consider setting thresholds for the scale of edge-of-centre and out-of-centre development which should be the subject of an impact assessment and specify the areas where this will apply;
 - 6 Plan to promote competitive town centres and provide consumer choice and ensure a diverse range of uses are provided throughout a centre;
 - 7 Ensure that the scale of any sites identified for development and the level of travel they generate, is in keeping with the role and function of that centre;
 - 8 Support shops and services in local centres and villages; and
 - 9 Identify sites in, or failing that, on the edge-of-centre, capable of accommodating larger format developments where there is a need for such development.

Development Management Policies

- 2.11 We briefly summarise the relevant development management policies below, insofar as these are of direct relevance.
- 2.12 As noted above, planning applications for retail and town centre uses will be assessed against PPS4 policies and the key sequential and impact tests. The policy also allows for local authorities to define any locally important impacts on centres which should be tested.
- 2.13 The requirement is to focus on the impacts during the first five years after implementation of a proposal. This includes consideration of the cumulative impact of the development with recent permissions and developments. PPS4 also requires the assessment to be proportionate to the scale of development

proposed and encourages local planning authorities to discuss and agree the type and level of information required within an impact assessment before submission.

- 2.14 In terms of the sequential approach, the policy requirements are largely unchanged, with sites required to be assessed for their availability, suitability and viability. However PPS4 makes it clear that where an applicant has not demonstrated compliance with the sequential approach, then planning applications for main town centre uses that are not in an existing centre and not in accordance with an up to date development plan, should be refused.
- 2.15 Similarly if a proposal is likely to lead to a significant adverse impact, whether on its own or cumulatively, it should also be refused. Where there is no significant adverse impact the local planning authority is required to determine an application taking account of the positive and negative impacts of the proposal and any other material considerations.

Development Plan Context

- 2.16 For completeness, we also briefly summarise other changes to the development plan that have occurred since November 2009.
- 2.17 Publication of both the LRCS and PPS4 predates the Coalition Government's revocation of Regional Strategies. However, this is of no relevance to LB Lewisham as the corresponding letter from the Secretary of State goes on to state *"the London Plan will continue to provide the planning framework for London Boroughs."*
- 2.18 Work on the draft replacement London Plan (October 2009) has not progressed significantly since completion of the LRCS. The Examination in Public (EiP) into submitted representations is currently underway and is scheduled to conclude in October 2010.
- 2.19 At a local level LB Lewisham has published a number of emerging LDF documents including, in February 2010, the submission Core Strategy. These documents draw, in part, on the LRCS and we comment on relevant elements below.

3.0 Implications for 2010 Supplementary Report

3.1 These subsequent policy documents, combined with the passage of time, effectively scope the extent of this Supplementary Report.

3.2 We summarise below the validity of the empirical data underpinning the LRCS.

3.3 Whilst PPS4 largely repeats the previous emphasis within PPS6 on the plan led approach, the key additional requirement in the preparation of Development Plans focuses on the ability of Local Planning Authorities to consider setting thresholds on the scale of retail and leisure proposals in edge-of-centre and out-of-centre locations above which retail/leisure assessments will be required. Effectively, there is scope for this threshold to vary from the “default” 2,500 sq m (identified in PPS4 policy EC5.4) above which application proposals should be the subject of an impact assessment and specific areas where this will apply.

3.4 We undertake this assessment for the nine centres in the Borough within section 4.0 of this report.

3.5 Finally, at section 5.0 of this report, we also review the extent of the Primary and Secondary Retail Frontages in the Borough in light of subsequent guidance in PPS4 (and the Practice Guidance) and our updated land use survey.

Validity of 2009 Data

3.6 The 2009 Report draws on a number of data sources. These include:

- Base population and expenditure data by study zone (derived from Experian experiences)
- Population projection (provided by the GLA)
- Existing Retail Floorspace (derived from IGD, Experience GOAD and other sources)
- A survey of existing shopping patterns of residents within the catchment area (undertaken by NEMS); and
- Retail commitments and proposals (provided by LB Lewisham)

3.7 As part of the brief for the 2010 Supplementary Report, LB Lewisham has asked NLP to assess whether this base data remains up to date or whether any part of it requires updating.

3.8 We have concluded that in a situation where the LRCS was completed around 9 months ago and the expenditure data has already had regard to the slow down in consumer expenditure (following the recent recession) it remains valid as it has had regard to recent macro-economic trends.

3.9 Furthermore, much of the rest of the data is updated on an annual (or less frequent) basis.

- 3.10 We have therefore concluded that the data remains up-to-date and the 2009 analysis remains robust.

4.0 Development Threshold

- 4.1 PPS4 (policy EC3.1 (d)) advises that *“Local Planning Authorities should consider setting thresholds for the scale of edge-of-centre and out-of-centre development which should be subject to an impact assessment under (EC16.1) and specify the geographic areas these thresholds will apply to.”*
- 4.2 Policy EC14.4 clarifies that an assessment addressing the impacts in policy EC16.1 is required for planning applications not in an existing centre, which are *“over the 2,500 square metres gross or any local floorspace threshold set under policy EC3.1d”*.
- 4.3 The Practice Guidance advises (para 7.4), that in setting such thresholds, important considerations are likely to include:
- The scale of known proposals relative to town centres;
 - The existing vitality and viability of town centres;
 - The cumulative effects of recent development;
 - The likely effects on a town centre strategy; and
 - The impact on any other planned investment.
- 4.4 It goes on to state (para 7.5) that in advance of LDFs being revised to reflect PPS4, it may occasionally also be relevant to consider the impact of proposals below this threshold, for example if they are large compared to a nearby centre, or likely to have a disproportionate effect or ‘tip the balance’ of a vulnerable centre.
- 4.5 This suggests that circumstances where a deviation from 2,500 sq m is appropriate may be rare, but nevertheless, an assessment against the criteria in para 7.4 is necessary in all circumstances.

Centres within LB Lewisham

- 4.6 Issues identified within the Practice Guidance of relevance to the Borough include:

The scale of known proposals relative to town centres

- 4.7 In respect of LB Lewisham there are a number of retail commitments and proposals in out-of-centre locations. These include the proposals at Bell Green, Convoys Wharf, Oxestalls Road, Marine Wharf, Cannon Wharf and Millwall.
- 4.8 There are also a number of proposals for substantial retail floorspace within, and on the edge of, Lewisham Town Centre (i.e. Lewisham Gateway and Loampit Vale). These are expanded upon within the LCRS (para 5.42).

The existing vitality and viability of town centres

- 4.9 The recent LRCS identified a number of weaknesses within centres across the Borough. It highlights, inter alia, that Lewisham town centre suffers from high vacancy rates (in part due to the preparation of the Lewisham Gateway Scheme) and Catford is vulnerable to an improvement in the retail offer of competing centres. Deptford appears vulnerable with few national multiples and variable environmental quality and Lee Green is a vulnerable district centre.
- 4.10 Overall therefore, there is concern about the overall vitality and viability of a number of centres in the Borough and there are also a number of retail commitments for substantial levels of floorspace both within and outside existing centres. These are all factors which the Practice Guidance suggests should guide the development threshold.

The Impact on any other planned investment

- 4.11 Catford Shopping Centre is now owned by LB Lewisham who is seeking to undertake improvement in the short and medium term. A number of improvements have been, and continue to be, made to Deptford Town Centre. In addition, a number of options for the redevelopment of the shopping centre in Lee Green are being actively explored.

Recommended Threshold

- 4.12 Whilst preceding publication of PPS4, the adopted UDP states (saved policy STC2) that proposals for substantial retail development should be assessed against a number of criteria. It goes on to state “*for guidance developments of 1,000 sq m gross floorspace or more will normally be considered substantial*”. We do not consider there has been any material change to the retail context in the Borough since the adoption of this policy.
- 4.13 We therefore consider that, in a situation where there are a number of factors in existence where the Practice Guidance suggests caution should be exercised in assessing the relevant threshold, and LB Lewisham have previously identified 1,000 sq m as being the relevant threshold for scrutiny of retail proposals, it is appropriate in these circumstances for LB Lewisham to adopt 1,000 sq m as the threshold (for the purposes of policy EC16.1) governing the assessment of retail and leisure proposals across the Borough.

5.0

Primary and Secondary Frontages

National Planning Policy Guidance

5.1

PPS4 (Policy EC3.1) states that Local Planning Authorities should define the extent of each centres Primary Shopping Areas on their proposals map *“having considered distinguishing between realistically defined primary and secondary frontages in the designated centres”* and set policies that make clear which uses will be permitted in such location.

5.2

PPS4 goes on to state that the Primary Shopping Area will generally comprise the primary and those secondary frontages which are contiguous and closely related to the primary shopping frontage. Smaller centres may not have areas of predominantly leisure, business and other main town centre uses adjacent to the primary shopping area, and therefore the town centre may not extend beyond the primary shopping area.

5.3

Primary frontages are defined within PPS4 as those *“likely to include a high proportion of retail use. By contrast Secondary frontages provide greater opportunities for a diversity of uses”*.

5.4

Further guidance on the extent of these frontages is contained within Practice Guidance, including:

- Existing primary frontages can be defined by prime rental levels and/or pedestrian flows (para 6.4); and
- An acknowledgement that the extent of the primary shopping primary/secondary frontages, and the role and function of different parts of the centre, may have changed over time (para 26).

Development Plan Context

5.5

The Lewisham UDP defines Core and Non-Core frontages within the nine town and district centres. These frontages are broadly akin with the definitions of primary and secondary frontages as subsequently defined within PPS4.

5.6

Subsequently, the submission draft Core Strategy states (para 6.93) *“the Council will allocate a primary and secondary shopping area for each district centre to ensure Core Retail Uses (A1) are retained and provided for”*. Core Strategy Policy 6: Retail Hierarchy and location of retail development reflects this intention, and goes on to state that *“secondary areas will help provide for the uses appropriate to the night time economy.”*

5.7

These frontages are defined in table 4.2 and summarised below. We understand that these primary and secondary frontages reflect those within the UDP.

- 5.8 LB Lewisham has requested that this Supplementary Report reviews the nine town and district centres as defined subsequently and advise whether any changes should be made to these designated frontages.
- 5.9 We set out below our methodology for assessing the current land uses within each of these centres and the basis for our recommendation for any alteration to the current primary and secondary frontages.

Methodological Approach

- 5.10 In June 2010 NLP Undertook an updated land use survey within the relevant centres. This drew on information published by GOAD (where this was available) and, in respect of Lee Green, a fresh land use analysis. Accordingly, our analysis relates to the area defined by GOAD and may differ slightly from the Major/District centre boundaries as defined within the Lewisham UDP.
- 5.11 Every ground floor unit within this area of search was recorded, and then allocated into one of the following categories.
- Convenience
 - Comparison
 - Retail Service (this includes use classes A3-A5 (Food and Drink) as well as A2 (Financial and Professional services).
 - Miscellaneous
 - Vacant; or
 - Non-Retail.
- 5.12 These classifications were then recorded onto a plan, and the current Shopping Core and Non-Core areas were identified on a similar plan at the same scale. These plans are contained at appendices 1-9, specifically:
- Lewisham Major Town Centre - Appendix 1
 - Catford Major Town Centre - Appendix 2
 - Blackheath District Centre - Appendix 3
 - Deptford District Centre - Appendix 4
 - Downtown District Centre - Appendix 5
 - Forest Hill District Centre - Appendix 6
 - Lee Green District Centre - Appendix 7
 - New Cross District Centre - Appendix 8, and
 - Sydenham District Centre - Appendix 9
- 5.13 From this cartographical base we then undertook an assessment of whether any revisions to these primary and secondary areas were appropriate. We set out our analysis for each centres below:

Lewisham

- 5.14 The current primary, secondary and other areas within Lewisham Major Town Centre are shown in table 5.1 below

Table 5.1 Primary, Secondary and Other Areas

Current Primary Areas	Current Secondary Areas	Other Areas
The Lewisham Centre	85-229 and 236-252	233-327 266-340
	262-328 Lewisham High Street	Lewisham High Street
	2-32 and 1-43 Lewis Grove	
	33-83 Lewisham High Street	
	1-91 and 6-116 Lee High Road	

Source: LB Lewisham: Core Strategy Submission (table 4.2)

- 5.15 We consider that the Argos unit within the Lewisham centre (which is currently neither a Primary nor Secondary area) should be designated as a primary area, as this is consistent with the other units within the Lewisham centre.
- 5.16 We note that the former public house at 67-71 Lewisham High Street is no longer in retail/leisure use. As this forms the end of the secondary area and is a sizeable unit, we consider it appropriate for this to be removed from the secondary area.
- 5.17 We are aware of a number of retail commitments and proposals in the borough, including Lewisham Gateway at the north of the centre and the proposed Lidl Store on Lee High Road. In the short term we have not suggested any changes to units which are currently vacant etc. to facilitate their development.
- 5.18 In the longer-term the Lewisham Gateway Development, upon completion, has the potential to act as an anchor development and increase/alter pedestrian flows within its vicinity. We do not consider any changes are appropriate to the primary and secondary area prior to this development. However, we suggest this situation is kept under review and any subsequent changes in representation etc. taken into account at any subsequent review.

Catford

- 5.19 The current primary, secondary and other areas within Catford Major Town Centre are shown in table 5.2 below.

Table 5.2 Primary, Secondary and Other Areas

Current Primary Areas	Current Secondary Areas	Other Areas
76-166 Rushey Green & Winslade Way	87-205 Rushey Green 42-70 & 43-85 Rushey Green	1-25 and 2-22 Brownhill Road 28-44 Sangley Road
	1-13 Bromley Road	
	6-44 Sangley Road	
	1-15 and 2-12 Brownhill Road	
	1-35 Catford Broadway	
	1-9 Catford Road (Station Buildings)	

Source: LB Lewisham: Core Strategy Submission (table 4.2)

5.20 The currently defined secondary frontages in the southern part of Catford, i.e. Numbers 1 to 13 Bromley Road and 2-20 Sangley Road, now include the substantial vacant cinema and a number of dwellings. Accordingly, we consider it appropriate for the current secondary area designation to be removed from these residential units, but that it is appropriate for the Cinema to continue to be identified as being within the secondary area. Numbers 2-12 and 3-15 Brownhill Road are in active use (primarily for retail services and convenience functions). Accordingly, we consider it appropriate for the secondary area to extend to these premises. We also consider that the Mecca Bingo Hall on Plassy Road, as a major contributor to the evening economy, would be appropriately designated as secondary retail frontage.

5.21 Our land use survey identifies that a number of units along Rushey Green to the north of Rosenthal Road are in retail service, convenience and comparison use. However, these uses are relatively sporadic and there are a number of intervening non-retail uses. Accordingly we do not consider it appropriate to extend the secondary shopping areas in this direction.

Blackheath

5.22 The current primary and secondary areas within Blackheath District Centre are shown in table 5.3 below

Table 5.3 Primary, Secondary Areas

Current Primary Areas	Current Secondary Areas
2-36 Montpelier Vale	1-25 Selwyn Court
1-23 Montpelier Vale	6-16 Blackheath Village
16-74 Tranquil Vale	16-34 Blackheath Village
3-49 Tranquil Vale	8-17 Royal Parade
6-12 Blackheath Village and Station Forecourt	25-49 Montpelier Vale
	Tranquil Passage
	1-4 Blackheath Grove
	1 Lawn Terrace

Source: LB Lewisham: Core Strategy Submission (table 4.2)

- 5.23 We do not consider that any changes are appropriate within the LB Lewisham part of the Centre and we confirm that we have not considered those units located within LB Greenwich

Deptford

- 5.24 The current primary, secondary and other areas within Deptford District Centre are shown in table 5.4 below

Table 5.4 Primary, Secondary and Other Areas

Current Primary Areas	Current Secondary Areas	Other Areas
1a-137a and 2-126 Deptford High Street	1-25 Deptford Broadway	2-14 New King Street
	483-505 New Cross Road	5-9 Watergate Street
	137c-227 and	2-10 and 7-31 Tanners Hill
	134-220 Deptford High Street	36-57 Deptford Broadway
		1-17 Deptford Church Street

Source: LB Lewisham: Core Strategy Submission (table 4.2)

- 5.25 We do not consider any changes are appropriate within Deptford. We have considered the scope for extending the frontages to the south side of Deptford Broadway, but consider this to be inappropriate in a situation where the majority of these uses are either vacant or in non-retail use.

Downham

- 5.26 The current primary, secondary and other areas within Downham District Centre are shown in table 5.5 below

Table 5.5 Primary, Secondary and Other Areas

Current Primary Areas	Current Secondary Areas	Other Areas
431-473 Bromley Road & 16-74 Downham Road	434-496 and 475-449 Bromley Road	1-9 Bromley Road and 422 Bromley Road.
	413-429 Bromley Road	

Source: LB Lewisham: Core Strategy Submission (table 4.2)

- 5.27 We do not consider any changes to the current areas within Downham are appropriate.

Forest Hill

- 5.28 The current primary, secondary and other areas in Forest Hill District Centre are shown in table 5.6 below

Table 5.6 Primary, Secondary and Other Areas

Current Primary Areas	Current Secondary Areas	Other Areas
4-58 London Road	2-30 Dartmouth Road	29-55 London Road
	35-105 Dartmouth Road and	6-18 Devonshire Road
	1-27 London Road	1-9 Davids Road
	1-33 Dartmouth Road and	Waldram Crescent and Place
	1-5 Devonshire Road	1-47, 2-28 Perry Vale

Source: LB Lewisham: Core Strategy Submission (table 4.2)

- 5.29 We consider it appropriate to extend the defined secondary area in Forest Hill within two locations. Firstly, there are two retail service uses between numbers 1-5 Davids Road and, in view of their location adjacent to other secondary uses, it would be appropriate to extend the secondary areas along this frontage. Secondly, it is apparent that the area to the east of the railway line (i.e. numbers 1-29 Perry Vale on the south side and 2-14 Perry Vale on the north side) also comprise a range of comparison, convenience and retail service uses and would appropriately be designated as secondary areas.

New Cross/New Cross Gate

- 5.30 The current secondary areas within New Cross/New Cross Gate District Centre are shown in table 5.7 below

Table 5.7 Secondary Areas

Current Secondary Areas
327-329 New Cross Road
275-321 New Cross Road
256-272 New Cross Road
253A-261 New Cross Road

Source: LB Lewisham: Core Strategy Submission (table 4.2)

- 5.31 The emerging core strategy contains the policy aspiration for New Cross and New Cross Gate to function as a single centre. In due course, therefore, it would be logical for these areas to run within and between both locations. At this stage, the area between both locations is primarily represented by non-retail uses. However, we consider it would be appropriate to extend the secondary frontages to comprise 385-407 New Cross Road and 447-473 New Cross Road reflecting the existing uses.

Sydenham

- 5.32 The current primary, secondary and other areas within Sydenham District Centre are shown in table 5.8 below

Table 5.8 Primary, Secondary and Other Areas

Current Primary Areas	Current Secondary Areas	Other Areas
13-111 and 14-78 Sydenham Road	80-118, 2-12, 3-11 Sydenham Road & 309-325 & 260-280 Kirkdale	120-175 and 113-209 Sydenham Road, 242-256 and 291-307 Kirkdale

Source: LB Lewisham: Core Strategy Submission (table 4.2)

- 5.33 We have considered the scope for extending Sydenham to include properties in the eastern part of Sydenham Road. We are concerned, however, that these uses are generally sporadic and would result in a significant enlargement of the retail frontages, which may serve to weaken other parts of the centre. Accordingly, at this stage, we do not consider that such an enlargement is appropriate.

Lee Green

- 5.34 The current primary, secondary and other areas within Lee Green District Centre, are shown in table 5.8 below

Table 5.9 Primary, Secondary and Other Areas

Current Primary Areas	Current Secondary Areas	Other Areas
1-24 Lee Green	2-10 Burnt Ash Road	382-392 Lee High Road
7-23 and 12-30 Burnt Ash Road	418-432 & 227-351 Lee High Road	2-8 Hedgeley Street
430 Lee High Road	2-18 Eltham Road	116-128 Lee Road

Source: LB Lewisham: Core Strategy Submission (table 4.2)

- 5.35 The land use survey identifies that the retail uses have contracted within the secondary area fronting Eltham Road, however, in view of the 2009 LRCS identifying the merits of a redevelopment of the Lee Gate Centre, we consider it would be inappropriate to remove the designation and effectively shrink the centre.
- 5.36 Conversely, it is apparent that a number of units on the northern side of Eltham Road are in retail and retail service use, however, these units lie outside the centre boundary and it would be inappropriate to consider designating them as secondary areas at this stage, without consideration of the extent of the centre boundary.

6.0

Conclusions

6.1

This Supplementary Report has been prepared by NLP and follows the publication of the Lewisham Retail Capacity Study in November 2009. Specifically it responds to a brief from LB Lewisham, highlighting additional work they wish to be undertaken.

6.2

Having reviewed the data sources within the 2009 Retail Study, we have concluded that the data remains up to date (and takes into account the implications of the recent recession). The quantitative analysis within the 2009 report therefore remains robust

6.3

This Supplementary Report considers the implications of PPS4 on the 2009 Retail Study. PPS4 was published in December 2009 (shortly after publication of the 2009 Retail Study), albeit the latter had regard to the then Draft PPS4.

6.4

Our review of PPS4 has identified that, whilst this largely repeats the previous guidance on the preparation of the development plan within PPS6, it introduced an additional requirement (in the preparation of development plans), to consider setting thresholds on the scale of retail and leisure proposals in edge-of-centre and out-of-centre locations, above which retail/leisure assessments will be required.

6.5

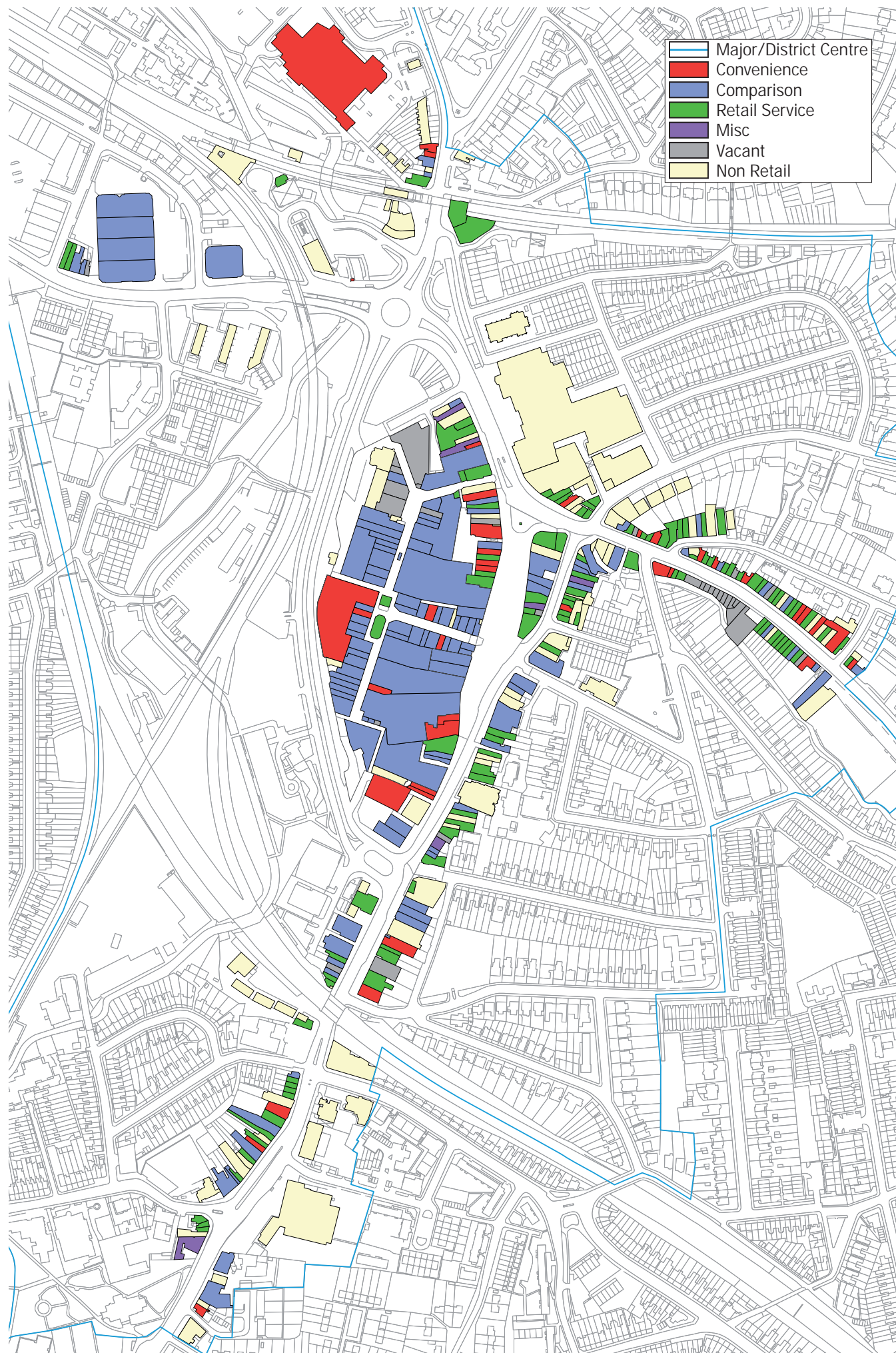
In effect, there is scope for this threshold to vary from the 'default' 2,500 sq m (identified in PPS4). Having undertaken a detailed analysis of the factors providing the extent of the relevant threshold, we consider it is appropriate in these circumstances for LB Lewisham to adopt 1,000 sq m as the threshold (for the purposes of Policy EC16.1) above which proposals for retail/leisure development should be required to permit an assessment. This is consistent with the current threshold within the UDP.

6.6

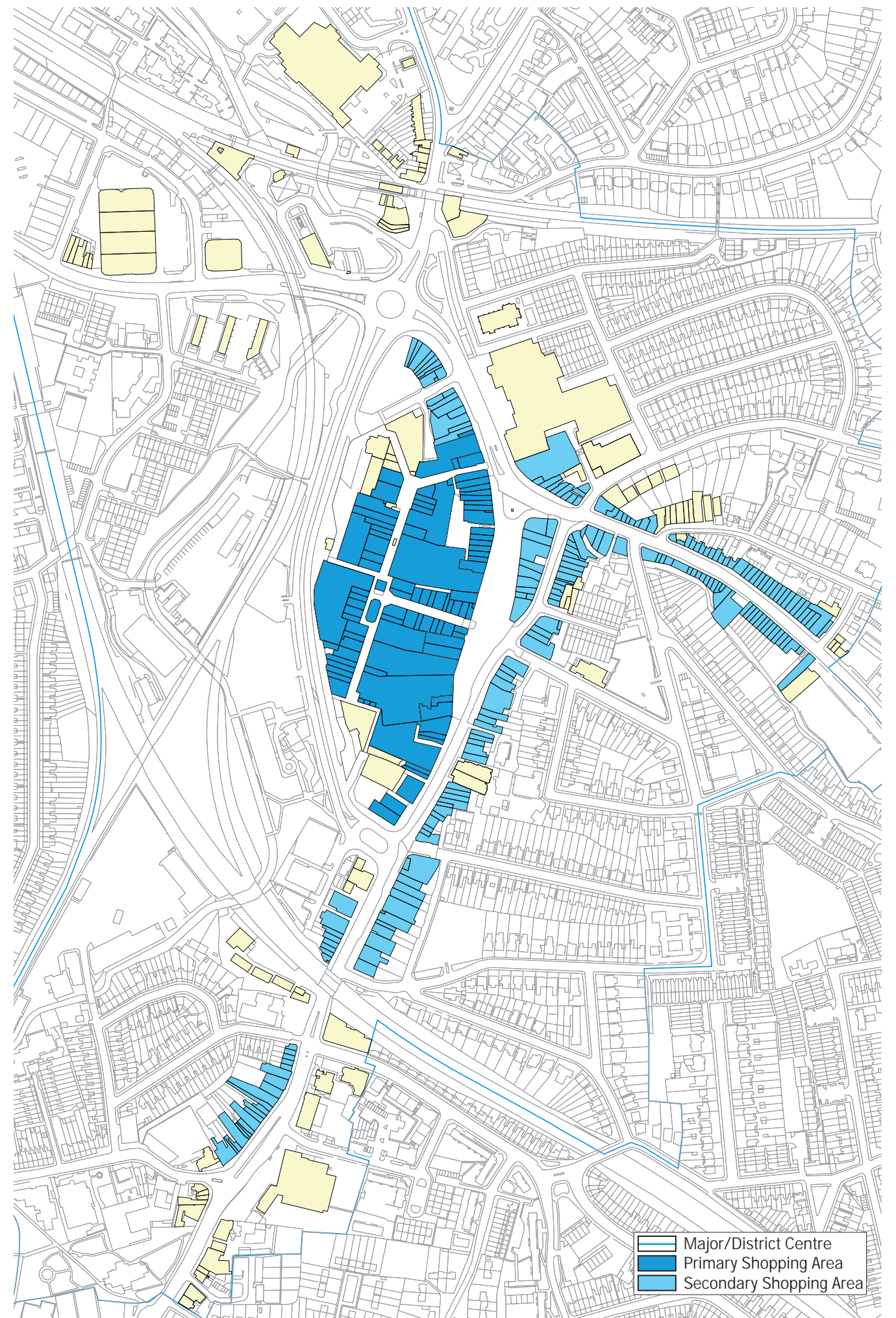
Finally, we have undertaken a review of the proposed extent of primary and secondary areas within the borough. We have made a number of recommendations on changes to these to reflect both (i) changes in representation since the 2004 UDP and (ii) re-designation which would assist other policy objectives (such as combining New Cross and New Cross Gate Centres).

Appendix 1

2010 Land Use Plan and Current UDP Designations - Lewisham



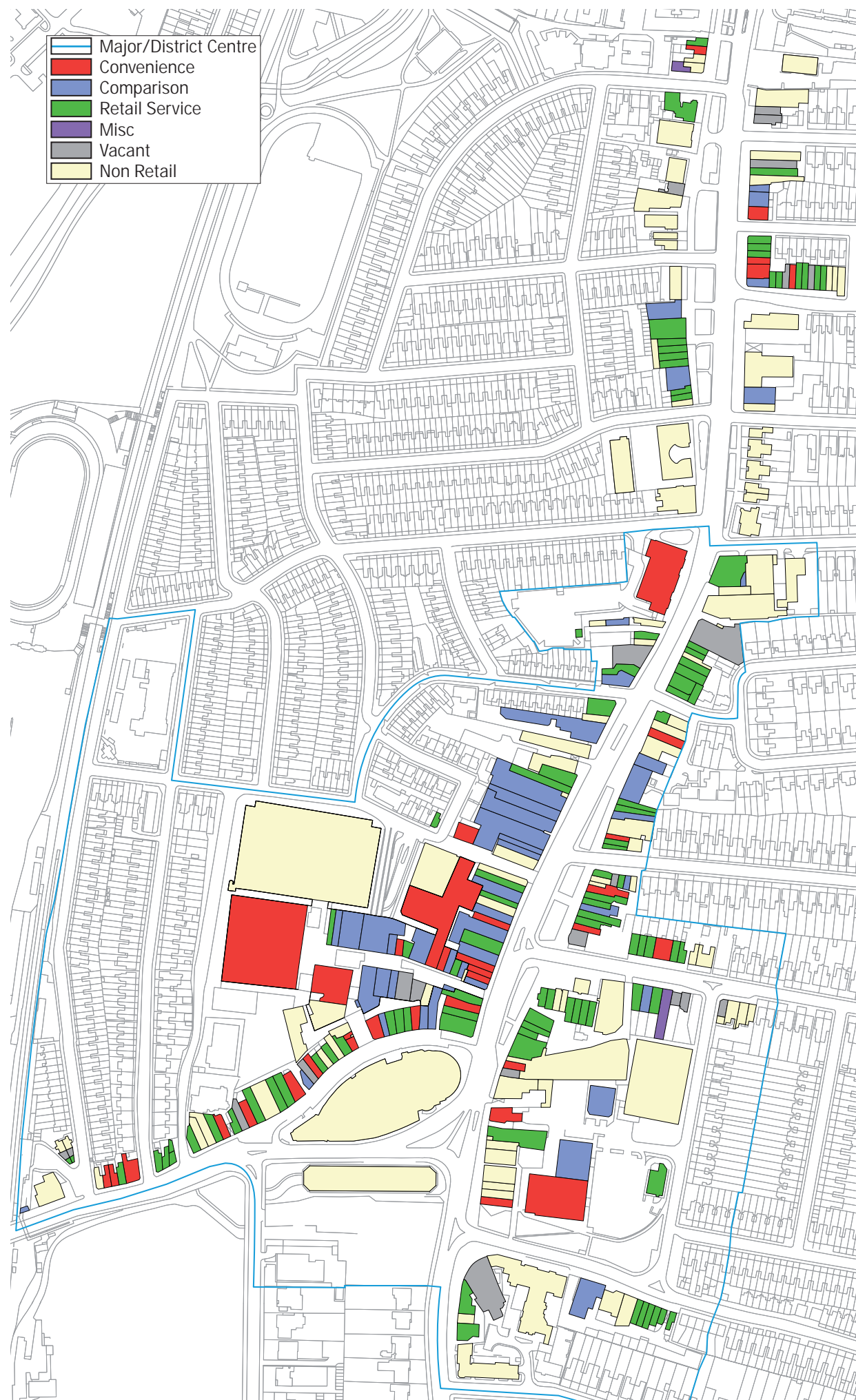
Lewisham Major centre, Land Use Plan (surveyed June 2010)



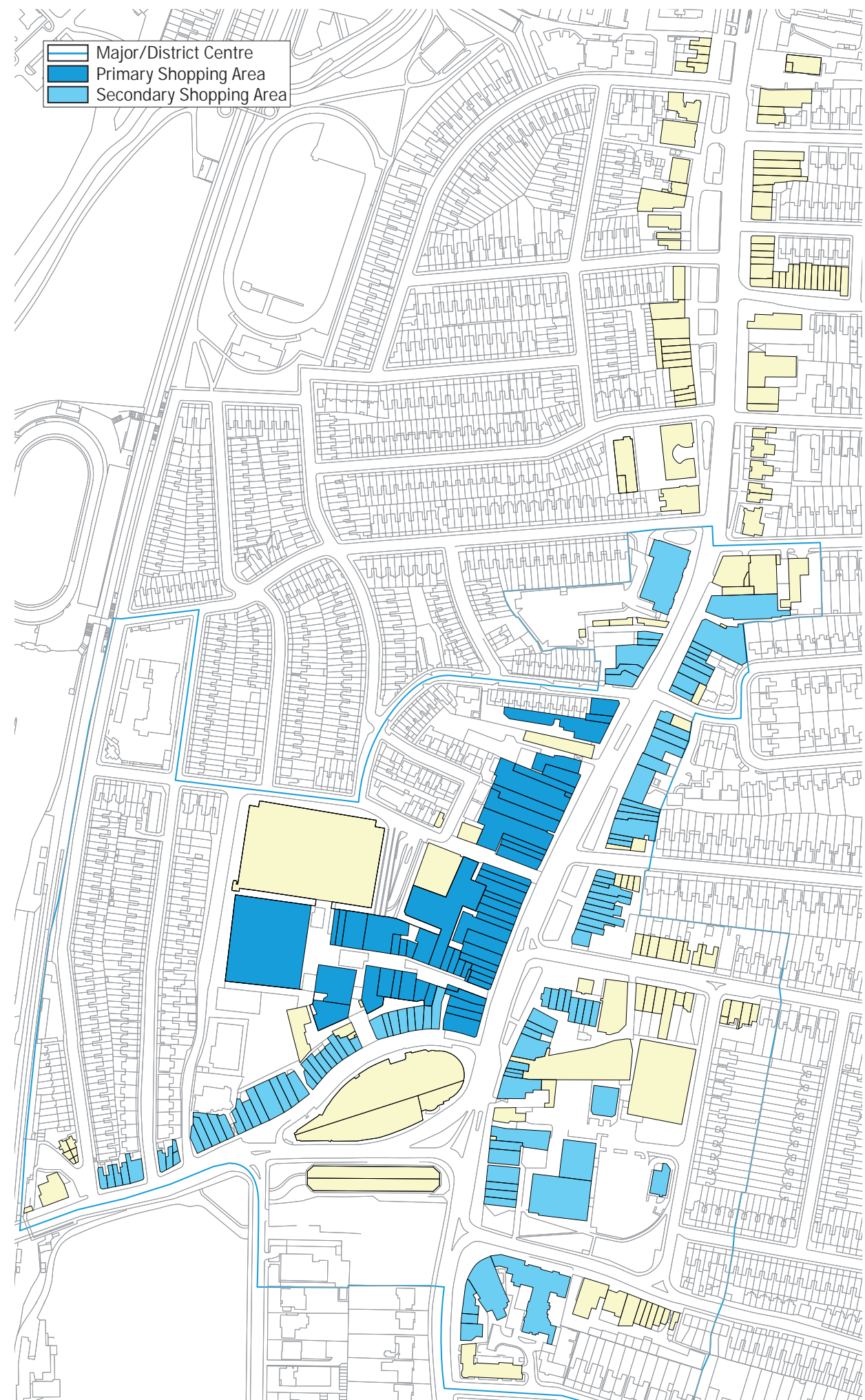
Lewisham Major Centre, Primary & Secondary Shopping Area as defined within Emerging Core Strategy (table 4.2)

Appendix 2

2010 Land Use Plan and Current UDP Designations - Catford



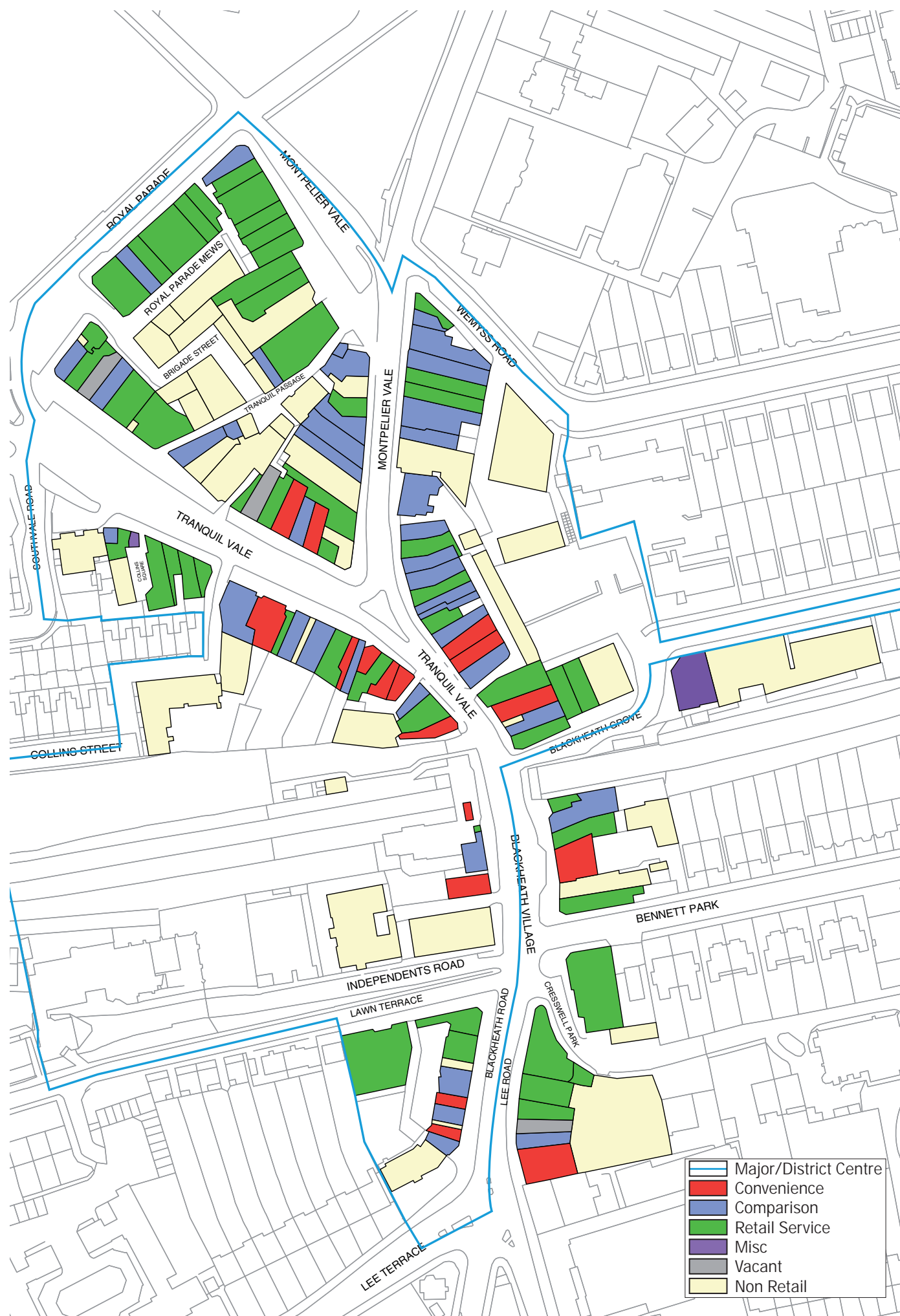
Catford Major centre, Land Use Plan (surveyed June 2010)



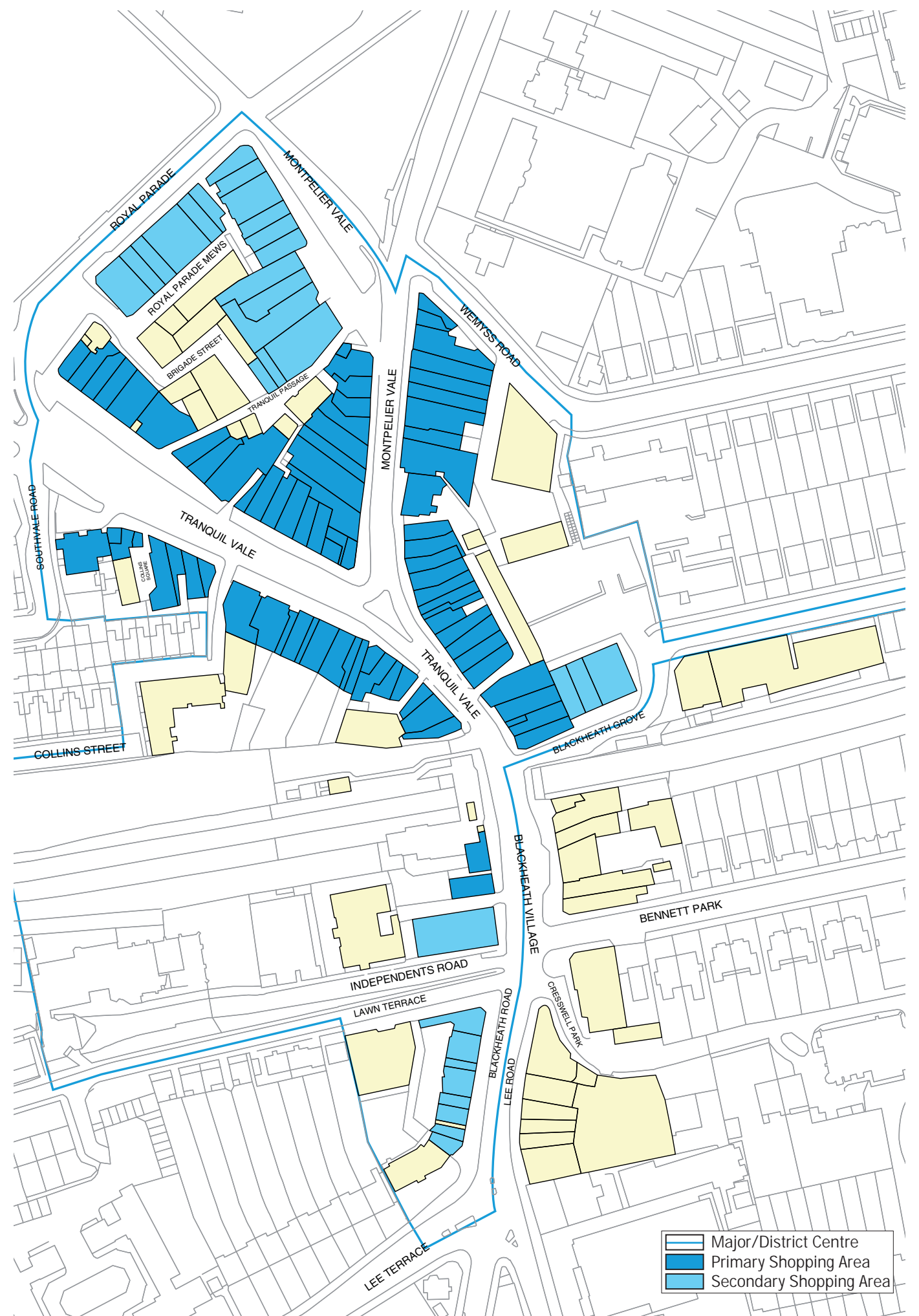
Catford Major Centre, Primary & Secondary Shopping Area as defined within Emerging Core Strategy (table 4.2)

Appendix 3

2010 Land Use Plan and Current UDP Designations - Blackheath



Blackheath District centre, Land Use Plan (surveyed June 2010)



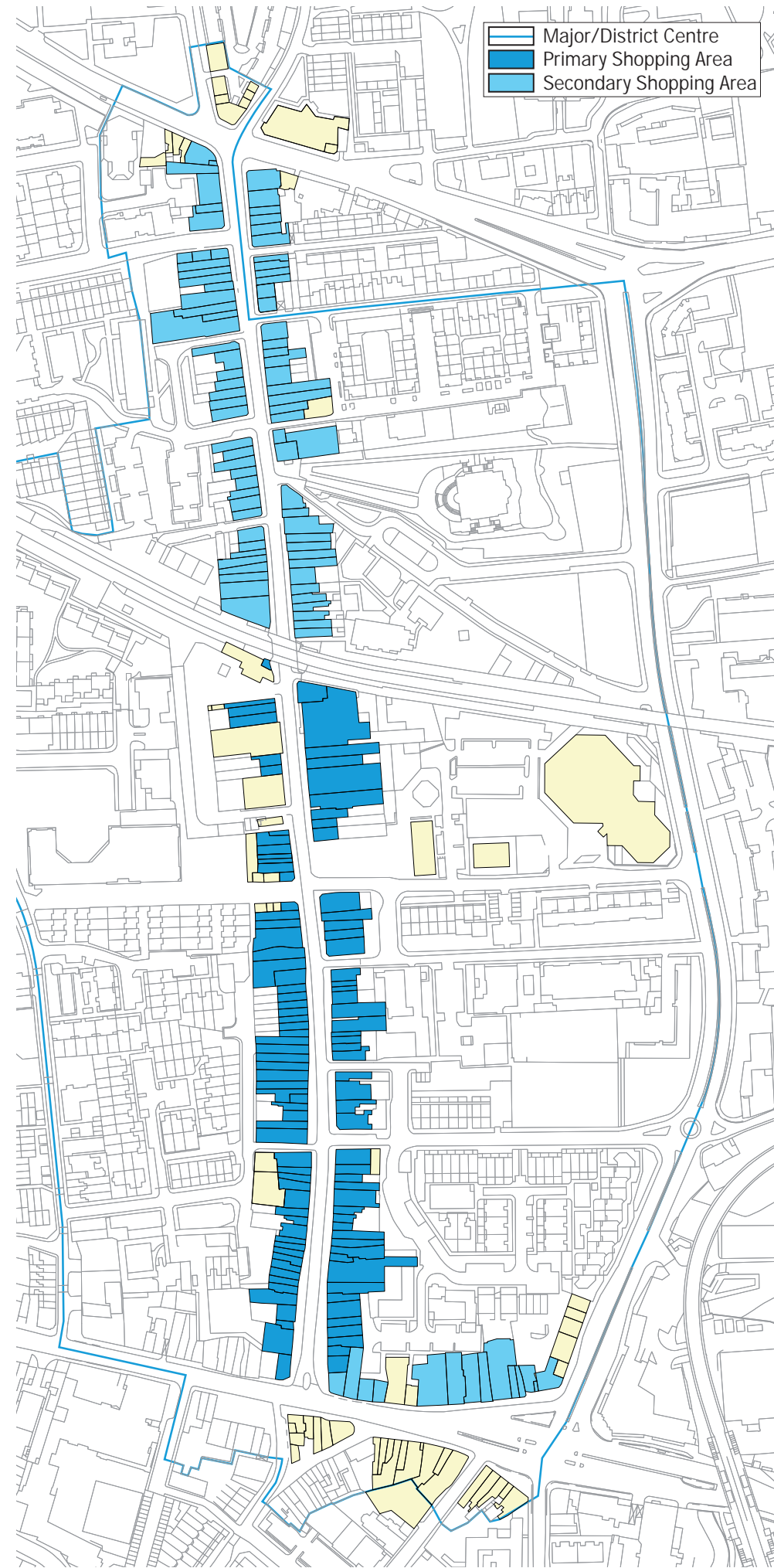
Blackheath District Centre, Primary & Secondary Shopping Area as defined within Emerging Core Strategy (table 4.2)

Appendix 4

2010 Land Use Plan and Current UDP Designations - Deptford



Deptford District centre, Land Use Plan (surveyed June 2010)



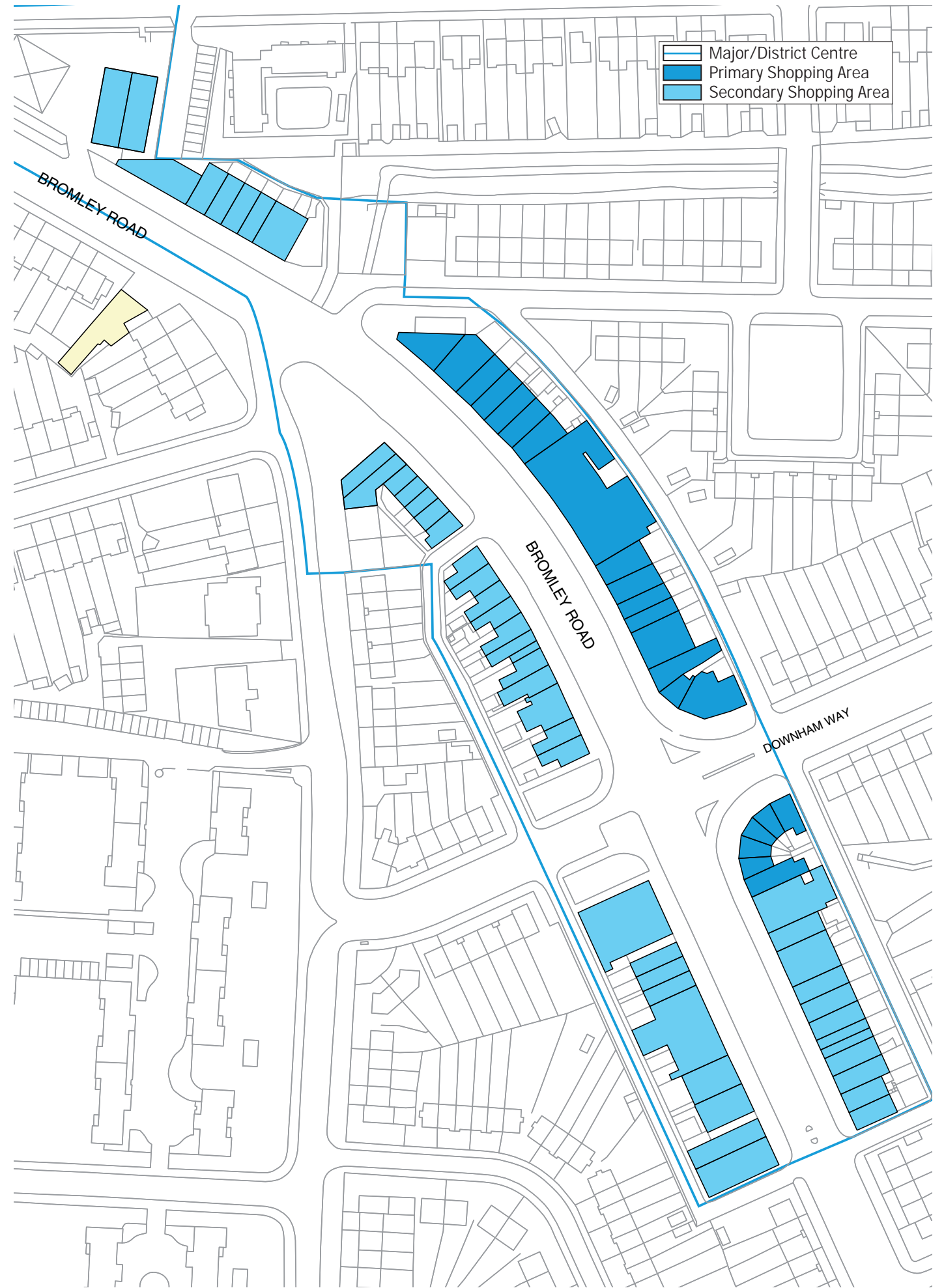
Deptford District Centre, Primary & Secondary Shopping Area as defined within Emerging Core Strategy (table 4.2)

Appendix 5

2010 Land Use Plan and Current UDP Designations - Downham



Downham District centre, Land Use Plan (surveyed June 2010)



Downham District Centre, Primary & Secondary Shopping Area as defined within Emerging Core Strategy (table 4.2)

Appendix 6

2010 Land Use Plan and Current UDP Designations - Forest Hill



Forest Hill District centre, Land Use Plan (surveyed June 2010)



Forest Hill District Centre, Primary & Secondary Shopping Area as defined within Emerging Core Strategy (table 4.2)

Appendix 7

2010 Land Use Plan and Current UDP Designations - Lee Green



Lee Green District centre, Land Use Plan (surveyed June 2010)



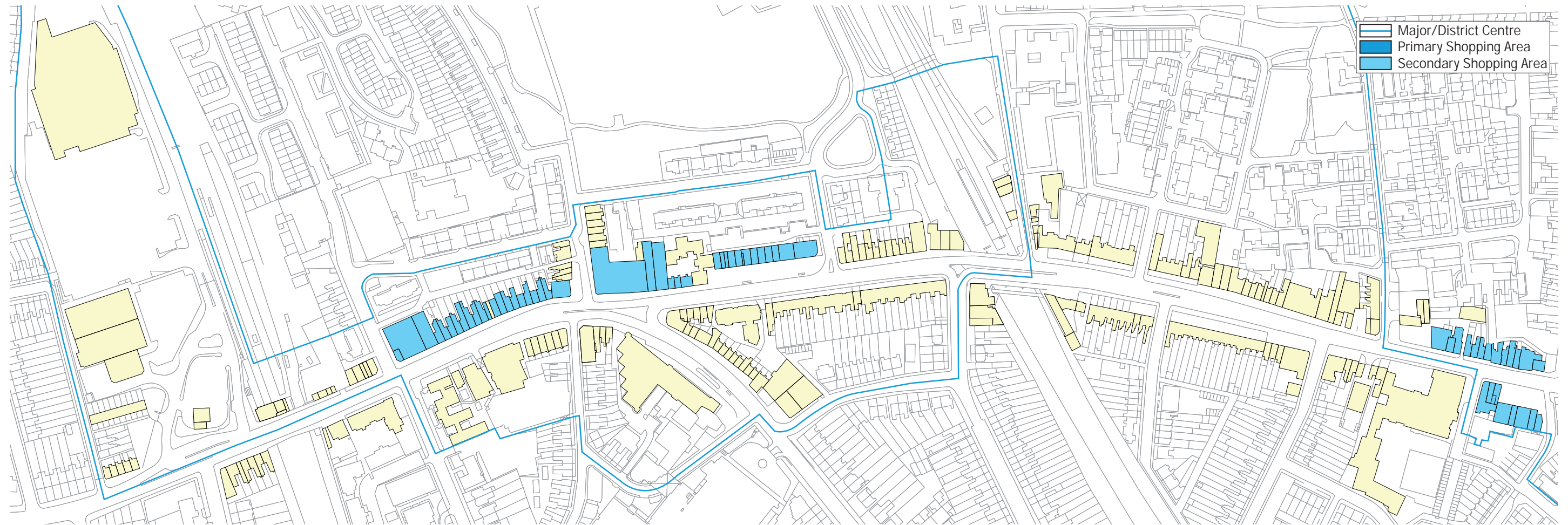
Lee Green District Centre, Primary & Secondary Shopping Area as defined within Emerging Core Strategy (table 4.2)

Appendix 8

2010 Land Use Plan and Current UDP Designations - New Cross



New Cross District centre, Land Use Plan (surveyed June 2010)



New Cross District Centre, Primary & Secondary Shopping Area as defined within Emerging Core Strategy (table 4.2)

Appendix 9

2010 Land Use Plan and Current UDP Designations - Sydenham



Sydenham District centre, Land Use Plan (surveyed June 2010)



Sydenham District Centre, Primary & Secondary Shopping Area as defined within Emerging Core Strategy (table 4.2)