



Planning Policy Team
London Borough of Lewisham
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By email and post
planning.policy@lewisham.gov.uk
Our ref. MM/PSD/815011

6 April 2010

Dear Sir/Madam

**LONDON BOROUGH OF LEWISHAM CORE STRATEGY DEVELOPMENT
PLAN DOCUMENT – PROPOSED SUBMISSION VERSION**

We write on behalf of our client, Berkeley Homes (Urban Renaissance) Ltd, in respect of the recently published Core Strategy Proposed Submission document.

Background

Berkeley Homes has submitted a planning application in January 2010 for the redevelopment and regeneration of the Marine Wharf (West) site in Deptford, Lewisham. This application, which is currently being considered, seeks planning permission for the mixed-use redevelopment of the site comprising residential, commercial and employment uses, and the re-instatement of the corridor of the former Grand Surrey Canal, a locally important historical feature, as a linear park. The application was submitted following extensive collaboration with the Council during the preparation of a Masterplan framework for the Surrey Wharves sites, which outlines a strategy for the comprehensive regeneration of the area.

The proposals will deliver a genuine mixed-use scheme that will re-invigorate a currently vacant site, and provide significant social, economic and physical benefits to the area. Furthermore, the proposals will act as a catalyst for the comprehensive regeneration of the surrounding Surrey Wharves and wider North Deptford area.

Berkeley's proposals at Marine Wharf (West) will be a significant contributor to the future growth of Lewisham given that the wider Plough Way (Surrey Wharves) site, within which Marine Wharf (West) is located, is a proposed Mixed-Use Employment Location as set out in the Core Strategy document.

Given our client's commitment to the redevelopment of the Marine Wharf (West) site to deliver a quality mixed-use development, and their support for the principle of redevelopment of the wider Plough Way site, they are keen to be involved in the Local Development Framework process.

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Core Strategy Proposed Submission Version

Our client broadly supports the overall spatial strategy and approach of the document in recognising the need to regenerate key areas of Lewisham, including the regeneration of key sites in Deptford and New Cross to lead to the re-invigoration of the north of the Borough. However, we have a number of specific concerns in relation to the document in its current format, and these are set out below.

Core Strategy Policy 4 – Mixed Use Employment Locations

Strategic Site Allocation 5 – Plough Way

Whilst we support the approach to allocate Mixed-Use Employment Locations in the Borough and the aspiration for the Plough Way Strategic Site Allocation, there are fundamental concerns surrounding the deliverability of these allocations. These concerns need to be addressed by the Council.

In particular, we raise concern over the 'blanket' approach of the Strategic Site Allocation policies, requiring prescriptively that a minimum of 20% of the total floorspace developed on these strategic sites must be devoted to the B-use class. This 'blanket' approach is not justified within the supporting text of the document, nor does there appear to be any identification of a clear evidence base from which this figure has been derived. This strict adherence to the B-use class is also contrary to the provisions of PPS4, which recognises that economic development incorporates a wider range of uses.

In respect of this policy, the Core Strategy fails two key tests as to the soundness of a Core Strategy, in that it is not justified and is not consistent with national policy.

The Council advises in the Core Strategy that it relies on the Employment Land Study, prepared by Roger Tym & Partners, as the evidence base for its policies. However, there is no evidence in the Employment Study identifying the specific need for a 20% provision of B-use class floorspace on the Strategic Site Allocations.

In addition, we also note that the approach in the Strategic Site Allocations policy, as noted above, varies from Core Strategy Policy 4, which specifies a requirement for 20% of the floorspace any development to be provided as B-class floorspace, whereas the Strategic Site Allocations policies indicate a 20% provision over the wider site. The proposed Core Strategy is unclear and inconsistent in this regard.

A more flexible approach should be adopted in relation to securing the mixed use redevelopment and regeneration of these Strategic Sites. Applying an approach based on development that meets local and strategic needs, informed by individual and well researched site specific employment assessments, would be more consistent with the approach of the Council's evidence base documents, including the Employment Land Study, in terms of:

- ensuring mixed use schemes are supported by local demand and supply assessments;
- focussing on quantum, quality and deliverability of jobs rather than the amount of floorspace provided;
- ensuring that objectives to maximise employment within the mixed use sites are based in commercial reality, so that schemes are viable and can be delivered;
- providing jobs in non-B class employment and delivering development that addresses the lack of local service facilities; and
- freeing up land to meet housing targets and recognising that mixed-use development will also be driven by the significant value of high density residential development.

Whilst we accept and understand the Council's preference for employment floorspace on these strategic sites, there needs to be a flexible approach based on delivering employment opportunities in a manner which is viable, deliverable and responsive to local need. It should be recognised that developments, such as that proposed at Marine Wharf (West), can provide greater employment opportunities in a manner which is efficient and meets local need, albeit that this may be achieved without adhering to a floorspace figure or percentage.

Core Strategy Policy 1 – Housing Provision, Mix and Affordability

Whilst we support the housing targets for the Borough, and consider that they are deliverable in the context of a positive overall spatial strategy, we consider that Policy 1 should be less specific in its requirements relating to provision and tenure mix of affordable housing. In particular, we object to the requirement that all new residential development in Lewisham should provide 50% of new housing as affordable housing. We consider that this target or “starting point” is too rigid to respond to site specific constraints and will not help the Council to promote development, particularly in the strategic allocations, which are fundamental to meeting the aims of the Core Strategy.

The London Plan and Draft London Housing Strategy are moving away from the 50% affordable housing target, seeking instead to implement Borough-based targets, which are to be applied flexibly to individual schemes, based on viability, individual site considerations and the need to encourage rather than restrain development. We feel that the Core Strategy should recognise this and follow suit accordingly. Furthermore, the policy should be based on a robust and transparent evidence base of all aspects of housing need. This is not evident in the case of the proposed policy, and this goes to questioning the ‘soundness’ of the proposed policy.

In line with this, we do support the acknowledgement that affordable housing provision should also take account of the objective of securing a more balanced social mix, particularly in areas of existing high concentrations of social rented housing. A flexible approach to the provision of affordable housing and innovative proposals that can meet specific local needs should be adopted in this regard.

Core Strategy Policy 21 – Planning Obligations

With regards to Core Strategy Policy 21, we have concerns in relation to the Councils approach towards planning obligations, and these are set out in detail in our separate representations towards the Planning Obligations Supplementary Planning Document, which is also currently on consultation.

Conclusion

Berkeley Homes (Urban Renaissance) Ltd is committed to working with LB Lewisham to support the Council's aims for development and regeneration throughout the Borough, and particularly with a view towards progressing the application at Marine Wharf (West). We look forward to reaching a positive conclusion to the current planning application, which will provide a catalyst for the regeneration of the surrounding area, to the benefit of existing and future residents of North Deptford.

However, the policy framework as proposed in the Core Strategy must allow for a flexible and justified approach, be supported by a robust evidence base, must satisfy key tests of PPS12 as to the soundness of the Core Strategy, and should support and encourage significant regeneration opportunities to be delivered.

At this stage, however, the required flexibility is not present and elements of the Core Strategy's policies are not justified by the supporting evidence base or in the context of national and regional policy. Given the emphasis the Council has placed on the Strategic Site Allocations and delivering housing in the Borough, a framework is needed in the Core Strategy to ensure that flexible, viable and deliverable schemes can be brought forward.

We look forward to confirmation that these representations have been received, and please contact me if you wish to discuss or clarify any of the issues raised.

Yours sincerely



Leanne Croft

cc: Mr T Pocock, Berkeley Homes (Urban Renaissance) Ltd



London Borough of Lewisham Local Development Framework

Core Strategy Development Plan Document (DPD)

Publication Stage Representation Form

Ref:

For official use only

**Please return your completed form to the London Borough of Lewisham by 5pm
Tuesday 6th April 2010**

- By post to
FREEPOST RRZZ TLHU GKZS
Planning Service
London Borough of Lewisham
5th Floor, Laurence House
1 Catford Road
London SE6 4RU

or

- By e-mail to planning.policy@lewisham.gov.uk

You may also make your representation online without the need to use this form.

- Online at <http://consult.lewisham.gov.uk/portal>

For further information, or to request extra representation forms please phone
020 8314 7400 or e-mail planning.policy@lewisham.gov.uk .

This form has two parts
Part A – Personal Details
Part B – Your representation(s).

Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title _____

First Name _____

Last Name _____

Job Title
(where relevant) _____

Organisation
(where relevant) BERKELEY HOMES
(URBAN RENAISSANCE)

Address Line 1 _____

Line 2 _____

Line 3 _____

Line 4 _____

Post Code _____

Telephone
Number _____

E-mail Address
(where relevant) _____

2. Agent's Details (if applicable)

MS _____

LEANNE _____

CROFT _____

INDIGO PLANNING _____

SWAN COURT _____

11 WORPLE ROAD _____

LONDON _____

SW19 4JS _____

020 8605 9400 _____

leanne.croft@indigoplanning.com

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Core Strategy does this representation relate?

Paragraph _____ Policy ^{4 - STRATEGIC SITE} ALLOCATION 5 (PLOUGH WAY) Proposals Map _____

4. Do you consider the Core Strategy is:

4.(1) Legally compliant Yes No

4.(2) Sound* Yes No

**The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form*

*If you have entered **No** to 4.(2), please continue to Q5.
In all other circumstances, please go to Q6.*

5. Do you consider the Core Strategy is **unsound** because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments. *(Continue on a separate sheet /expand box if necessary)*

PLEASE SEE ATTACHED LETTER

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

PLEASE SEE ATTACHED LETTER

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

- No, I do not wish to participate at the oral examination
 Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

WE FEEL IT IS NECESSARY TO PARTICIPATE AT THE ORAL EXAMINATION BECAUSE OF THE COMPLEXITY AND IMPORTANCE OF THE ISSUES RAISED.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: 

Date: 6/04/2010

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Core Strategy does this representation relate?

Paragraph _____ Policy 1 _____ Proposals Map _____

4. Do you consider the Core Strategy is:

4.(1) Legally compliant Yes No

4.(2) Sound* Yes No

**The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form*

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Date: 6/04/2010

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Core Strategy does this representation relate?

Paragraph _____ Policy 21 Proposals Map _____

4. Do you consider the Core Strategy is:

4.(1) Legally compliant Yes No

4.(2) Sound* Yes No

**The considerations in relation to the DPD being 'Sound' are explained in the notes which accompany this form*

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