

## Public Examination of Lewisham Core Strategy Development Plan Document

### London Borough of Lewisham Statement on Matter 8 Retail

#### Question: Whether the plan's retail strategy is sound

#### Introduction

- 8.1 The plan's retail strategy is sound for the reasons set out below.
- 8.2 In developing the spatial strategy and policies, the Core Strategy was subject to a series of public consultation exercises ranging from issues and options (2005) (**CSD2.19**), through to preferred options (2007) (**CSD2.22**), further options (2009) (**CSD2.24**), and the Proposed Submission Version (2010) (**CSD2.27**). At all stages the consultation accorded with the Lewisham Statement of Community Involvement (**CSD1.8**). Representations received on strategic spatial options and alternatives, and topic-based issues and options were taken into account in developing the retail strategy, as indicated in the Consultation Statement (**CSD 1.10**).
- 8.3 A Sustainability Appraisal (SA) (**CSD1.2**) of the Core Strategy, hence the retail strategy contained therein, was undertaken. In general, the SA reported positively on the elements making up the retail strategy.
- 8.4 The retail strategy accords with the Lewisham Sustainable Community Strategy (SCS) (**CSD3.1**) vision and priority 'delivering together, efficiently, effectively and equitably' and its outcome 'dynamic and prosperous'. This vision is carried forward in the Core Strategy:
- drivers for change 'Growing the local economy' (**CSD1.1**, Section 3)
  - Vision for Lewisham 2026 (**CSD1.1**, Section 4, paragraph 4.3)
  - Strategic Objective 4 (**CSD1.1**, Section 5, parts 4(d) and (e))
  - Spatial Policies SP1, SP2, SP3, SP4 and SP5 (**CSD1.1**, Section 6) and
  - cross cutting and thematic policies, in particular Core Strategic Policy 6 (CSP6) (**CSD1.1**, Section 7).
- 8.5 The Lewisham Retail Capacity Study (RCS) (**CSD3.13**) and the Lewisham Supplementary Report to the RCS (**CSD3.14**) form the key evidence base for the plan's retail strategy. The retail strategy is consistent with Planning Policy Statement 4 (PPS4) (**CSD5.4**) and reflects the policies contained within the London Plan (**CSD4.1**) and the draft replacement (**CSD4.2**).

#### Retail hierarchy

- 8.6 To accord with PPS4 (**CSD5.4**, Policy EC3.1b(i)), choices have been made in the Core Strategy (**CSD 1.1**) about which town centres will accommodate the identified need for growth. This is shown in policies SP2, SP3, SP4, SP5 and CSP6 (**CSD 1.1**, Section 6 and Section 7 respectively). The Core Strategy therefore identifies the type

and quantity of retail development achievable across the borough and protects and enhances the town centres and local retail areas.

- 8.7 To support the spatial policies, CSP6 (**CSD1.1**, Section 6, Table 7.2) clearly defines the network and hierarchy of town centres in accordance with PPS4 (**CSD5.4**, Policy EC3.1b). This consists of:
- major and district centres
  - neighbourhood local centres
  - out of centre retail locations and
  - the parades which are over 80 in number.
- 8.8 In doing so, and based on recommendations in the RCS (**CSD3.13**), the Core Strategy takes forward the borough's existing network of town centres as shown in the Lewisham Unitary Development Plan (UDP) (**CSD2.1**) save for the inclusion of the UDP New Cross Gate neighbourhood centre as part of a new combined New Cross/New Cross Gate District Centre.
- 8.9 This retail hierarchy accords with the London Plan (**CSD4.1**, Annex 1) and the consultation draft replacement London Plan (**CSD4.2**, Annex 2), which identifies the borough's Major and District Town Centres. Lewisham and Catford are identified as Major Centres together with seven district centres.
- 8.10 The plan's retail strategy emphasises the importance of local provision in meeting the day-to-day needs of local communities. Hence policies SP3, SP4, SP5 and CSP6 acknowledge the role of neighbourhood local centres and parades as part of the borough's network of centres and support the role of farmers' and street markets.

#### **Distribution of retail growth**

- 8.11 The RCS (**CSD 3.13**) carried out a retail and town centre needs assessment of the borough's main centres, including estimates of population growth, personal expenditure estimates and resultant potentially available expenditure and its distribution over various periods of time. The RCS concludes, that overall, to meet projected expenditure growth there is need for additional shopping facilities and sets these out for the short term period to 2016 and then for the medium to longer term period to 2026. The RCS however emphasises that the projections should not be considered to be maximum/minimum limits or targets as some town centre schemes may come forward outside the specified time limits.
- 8.12 The retail strategy reflects the RCS's phased approach to projected growth. This will allow careful monitoring of the effects of the current economic downturn, credit restrictions and unforeseen circumstances on longer-term predicted expenditure and floorspace growth beyond 2016 and up to 2026.
- 8.13 Core Strategy Policy CSP6 (**CSD1.1**) is consistent with the objectives of PPS4 (**CSD5.4**, Policy EC2) and the London Plan (**CSD4.1**) in focusing new development of main town centre uses (e.g. retail, leisure, arts, culture and entertainment) in existing

Major and District Centres and protecting local shopping facilities and markets with the aim of offering a wide range of services to local communities.

- 8.14 In determining the distribution of retail growth the sequential approach was followed, to accord with PPS4 (**CSD5.4**, Policy EC5.2) by first assessing the potential of sites in existing centres to accommodate identified retail growth, next evaluating the potential of edge-of-centre locations and then for potential new sites in accessible locations.
- 8.15 The RCS (**CSD3.13**) supports the Council's ambition for Lewisham Town Centre to achieve metropolitan status by 2026 (**CSD1.1**, Policy SP2). The RCS found that with the exception of the Major Town Centres of Lewisham (in particular) and Catford, there is little opportunity for development within the other town centres to accommodate large scale retail growth. To facilitate metropolitan status for Lewisham Town Centre the retail strategy supports a significant quantum of new and improved retail (and mixed use) development for the borough within the Town Centre boundary, as well as limiting additional floorspace in out-of-centre locations such as Bell Green (**CSD1.1**, Spatial Policy SP2 and SP4).
- 8.16 In order to be responsive to future retail demands and facilitate appropriate regeneration, the Council will prepare Area Action Plans (AAPs) for the Lewisham and Catford town centres (**CSD 1.1**, Policy SP2). This will provide the detailed policy and delivery framework for two of the borough's most important town centres and among other things facilitate an improved local retail offer. This is in line with PPS4 (**CSD5.4**, Policy EC3(h)).

### **Retail frontages**

- 8.17 The Core Strategy (**CSD1.1** Appendix 4, Table 4.2) lists primary and secondary frontages in the Major and District town centres, taken from the UDP (**CSD2.1**). These frontages have since been reviewed following the recommendations in the RCS Supplementary Report (**CSD3.14**) and in response to the representations (**CSD1.9**). The Council is now recommending the deletion of Core Strategy Appendix 4 (**CSD1.1**) and the retention of the relevant UDP designations. The update of primary and secondary retail frontages will be included in subsequent development plan documents (DPDs) and shown on a proposals map in line with the requirements of PPS4 (**CSD5.4**, Policy EC3.1 (C)).

### **Implications for Implementation and Monitoring**

- 8.18 As identified in the Core Strategy monitoring and implementation framework (**CSD1.1**, section 9), development management decisions will assess the suitability of schemes in accordance with the policies in the development plan (the Core Strategy, saved UDP policies and the London Plan). The AAPs will provide the delivery framework for the Lewisham and Catford town centres. The Core Strategy monitoring framework includes indicators relating to the amount of new floorspace located in identified centres, the amount of vacant floorspace in the primary shopping areas and the amount of employment land delivered across the retail hierarchy.

- 8.19 In line with PPS4 (**CSD5.4**) the Council will use the Annual Monitoring Report (AMR) to review the network and hierarchy of centres, the need for further development and the vitality and viability of centres. These requirements will be met through the annual review of the Retail Health Checks that form part of the Core Strategy evidence base, with subsequent reporting within the AMR.
- 8.20 In line with the RCS recommendation, long-term projections beyond 2016 will be monitored and kept under review. The implications of major retail development within the borough and competing centres will also be monitored, and carefully considered, particularly the effects proposals may have on the demand for additional development in the borough.