

Public Examination of Lewisham Town Centre Local Plan

London Borough of Lewisham response on the Inspector's Initial Questions 7 and 8 (Retail categorisation).

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 submitted version of the Lewisham Town Centre Local Plan (LTCLP) does not clearly define the terminology used to describe the plan boundary, the town centre boundary and the designation of retail frontages. In accordance with the queries raised and suggestions proposed in the Inspectors Questions 7 and 8, the Council have reviewed the terminology used and mapped in the LTCLP and propose a number of amendments and clarifications.
- 1.2 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. Boundaries

- 2.1 The Inspector suggests that the "town centre boundary" identified in Figure 3.1 of the LTCLP is in actual fact the area covered by the LTCLP. The Council agree with this assertion and would like to clarify that it has always been the intention of Figure 3.1 to show the plan area. The Council propose to amend the legend of Figure 3.1 to rename "Town centre boundary" to "Plan area boundary".
- 2.2 In order to provide further clarity, the Council also propose to add a "town centre boundary" to Figure 3.1. The Council consider that this is not a replacement for the previous incorrectly named "town centre boundary" described above, but is a new addition to the map to reflect the NPPF glossary definition of "town centre". A further proposed addition details those parts of the town centre that are considered as "edge of centre" in line with the definition included in the glossary of the NPPF.
- 2.3 The implications of including the new "town centre boundary" and the "edge of centre" areas in Figure 3.1 are discussed further in part three of this paper.

- 2.4 As a result of the proposed changes, both Section 3.1 and Figure 3.1 should be renamed “Plan boundaries”. There are also amendments that will be required to the text in Section 3.1 to reflect the map changes. Proposed amendments to Figure 3.1 are demonstrated in Appendix 1 to this report (note: Appendix 1 is an indicative draft replacement map. The Council would seek a professionally produced map for insertion into the adopted plan). Proposed amendments to the text in Section 3.1 of the LTCLP are detailed in the box below. (Note: It is proposed to add the **bold and underlined text** and delete the ~~strikethrough text~~).

3.1 The ~~town centre boundary~~ **plan boundaries**

Overview

- 3.1 ~~The town centre plan area boundary has been reviewed and adjusted to provide the most appropriate scope to the town centre LTCLP.~~

Policy LAAP1: ~~Town centre boundary~~ **Plan boundaries**

The **plan area and** town centre boundary has **boundaries have** been defined as shown in Figure 3.1, **alongside those parts of the town centre that are considered edge of centre.**

Delivery context

- 3.2 ~~The town centre plan area boundary reflects the role of Lewisham as the borough’s principal town centre and the aspiration to achieve metropolitan town centre status. The town centre boundary includes areas that may be considered as ‘town centre’, ‘edge of centre’ or ‘out of centre’ retail areas. Appropriate town centre uses and the level of future development within each area are provided in Section 4.~~

3.2 The town centre boundary includes the primary shopping area and those areas predominantly occupied by main town centre uses. Within the town centre boundary, several locations are designated as ‘edge of centre’ while locations beyond the town centre boundary are considered ‘out of centre’. These designations have been made in accordance with the definitions in the glossary of the NPPF.

- 3.3 For the full list of policy and evidence base linkages with this policy see Appendix 1.

- 2.5 A small number of changes are required to the rest of the plan to reflect references to the “town centre boundary” which will require amendment to refer to the “plan area boundary”. These are located in paragraphs 1.5, 1.11, 1.22, 3.6, 3.10, 5.65, 5.89, Appendix 2 and Appendix 3 and are considered by the Council to be minor additional modifications.

3. Town centre areas

- 3.1 It is proposed to define the “town centre boundary” as detailed in the box above and the amended Figure 3.1 in Appendix 1 to this paper (note: Appendix 1 is an indicative draft replacement map. The Council would seek a professionally produced map for insertion into the adopted plan).
- 3.2 The document ‘LTCLP1.7a Schedule of recommended additional modifications to the LTCLP’, recommends the inclusion of definitions, that align with the NPPF glossary, of “town centre”, “edge of centre” and “out of centre” in the glossary of the LTCLP. These definitions relate to the designations detailed in proposed replacement Figure 3.1 and used in the introductory paragraphs in each section of Chapter 4 of the submitted LTCLP.
- 3.3 The Council propose that the addition of the “town centre boundary” and the “edge of centre” areas in Figure 3.1 do not constitute main modifications to the plan. The terminology was used frequently in the submitted LTCLP, in accordance with the NPPF definitions, however confusion was caused by the incorrect naming of the “plan area boundary” as the “town centre boundary” in Figure 3.1.
- 3.4 The Inspector states that Lee High Road, Loampit Vale and Conington Road are described as “edge of centre” in the submitted LTCLP, although the latter is changed by a proposed main modification in submitted document LTCLP1.7 to “out of centre”. The Council confirm that the Inspectors understanding is correct. However, having reviewed the designation of boundaries as part of this exercise the Council now consider that the Conington Road area is no longer recommended for modification and should remain as an “edge of centre” location, by removing MM13 from the document ‘LTCLP1.7 Schedule of recommended main modifications to the LTCLP’. The reasoning for this is that the Council consider that the delivery of the Lewisham Gateway development will extend the Primary Shopping Area to an extent that will mean that the Tesco site (Site 6) will be within 300m of it and thus, in accordance with the NPPF definition, should be considered as an “edge of centre” location.
- 3.5 The submitted version of the LTCLP used the term “Town Centre Area” to define a number of distinct sub-areas of the plan. In order to avoid confusion in the plan, the Council propose that the term “Town Centre Area” as previously defined in Section 3.2 of the submitted LTCLP is renamed as “Policy Area”. Due to the regular frequency of the use of this term in the plan, the individual amendments required have not been listed in this paper.
- 3.6 Policy LAAP16 Part 5 of the submitted LTCLP is currently called “Retail Town Centre Areas”. Again, to assist in the clarity of the plan it is proposed to rename this title to “Retail Character Areas”.
- 3.7 The changes to nomenclature proposed in paragraphs 3.5 and 3.6 are not considered by the Council to be matters of soundness for the plan. Rather, the Council would propose to implement these amendments as ‘additional modifications’ prior to adoption of the plan.

4 Retail areas and frontages

- 4.1 The Council acknowledge that there are incorrect references to the following retail terminology in the plan and therefore propose to make the amendments shown in Table 4.1. There has been no intention from the Council to have separate definitions for shopping / retail ‘areas’ and ‘frontages’, rather all references up until this point have been intended at all times to refer to ‘shopping frontages’. Existing references to shopping / retail ‘areas’ are errant.

Table 4.1

Existing errant terminology in LTCLP	Proposed corrected terminology
Primary area	Primary shopping frontage (or PSF)
Primary shopping area	Primary shopping frontage (or PSF)
Secondary area	Secondary shopping frontage (or SSF)
Secondary shopping area	Secondary shopping frontage (or SSF)

- 4.2 The proposed corrected terminology is to be implemented throughout the document, including in the legend of Figure 5.1 (See amended map in Appendix 2 to this paper) (note: Appendix 2 is an indicative draft replacement map. The Council would seek a professionally produced map for insertion into the adopted plan).
- 4.3 The Inspector states that Lee High Road is defined both as a ‘secondary area’ and as ‘secondary frontage’ within the town centre. The Council confirm that any reference to ‘secondary area’ is a factual error and should instead refer to ‘secondary shopping frontage’. However, the Council can not find an occurrence of Lee High Road being defined as a ‘secondary area’ in the text of the submitted plan, therefore no specific amendment is proposed. If the query refers to the errant legend of Figure 5.1, appropriate amendments are proposed in Table 4.1 above.
- 4.4 The Council confirm that the new retail/leisure floorspace detailed in the LTCLP in the Central Town Centre Area and on the Lewisham Gateway site is intended to extend the ‘primary shopping frontage’. It is therefore proposed to show on Figure 5.1 the anticipated retail frontage in the area as ‘proposed additional primary shopping frontage’. Subsequently, for clarity, the Council believe it is appropriate to show part of Loampit Vale as ‘proposed additional secondary shopping frontage’. There is also a requirement to show a small section of shops in the town centre that are currently secondary shopping frontage as ‘proposed to change to primary shopping frontage after the completion of the Lewisham Gateway scheme’.
- 4.5 As explained in this paper, the submitted LTCLP has not up until this point designated or referred to a ‘primary shopping area’. However, the Council acknowledge that the NPPF definitions for ‘town centre’ and ‘edge of centre’ which are referred to in the LTCLP use ‘primary shopping area’ in their definitions. Therefore, for clarity, the Council propose to show the ‘primary shopping area’ on Figure 5.1 (See amended map in Appendix 2 to this paper) (note: Appendix 2 is an indicative draft replacement map. The Council would seek a professionally produced map for insertion into the adopted plan).
- 4.6 Figure 5.1 is titled ‘Retail areas’. The Council propose that for clarity this is renamed as ‘Retail designations’ (See amended map in Appendix 2 to this paper) (note: Appendix 2

is an indicative draft replacement map. The Council would seek a professionally produced map for insertion into the adopted plan).

- 4.7 The changes proposed in this paper to Figure 5.1 will also need to be reflected in Table 5.1 of the LTCLP and on page 181 of the submitted Site Allocations Local Plan.
- 4.8 In Policy LAAP16, the title 'Other shopping areas' should be renamed 'Other shopping frontages' for clarity.
- 4.9 For information, the Council consider that the amendments proposed in part 4 of this paper are not a matter of soundness, but are to fix errors in the submitted plan and for clarification purposes. Therefore the Council propose to implement the amendments as 'additional modifications' prior to adoption of the plan.

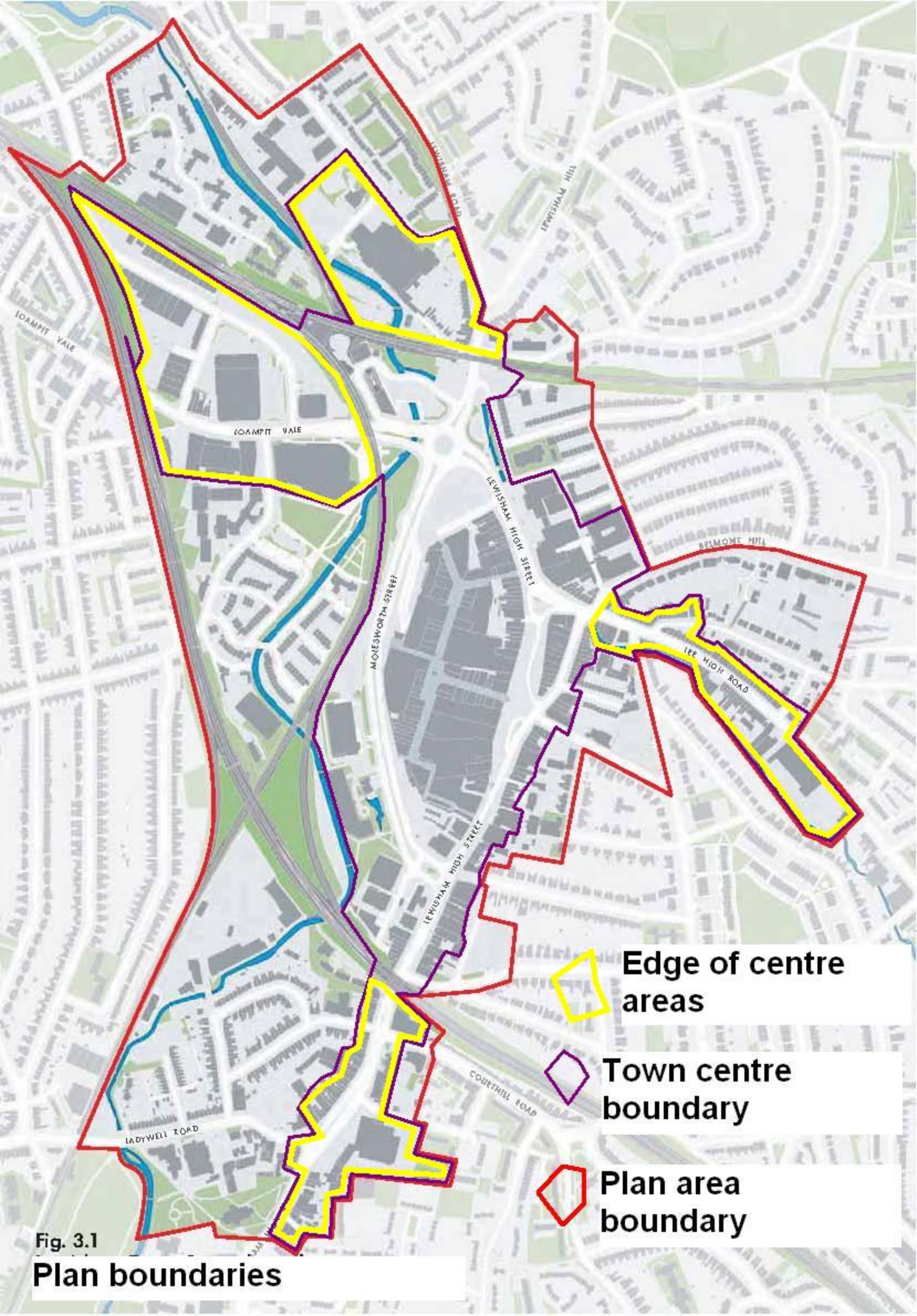
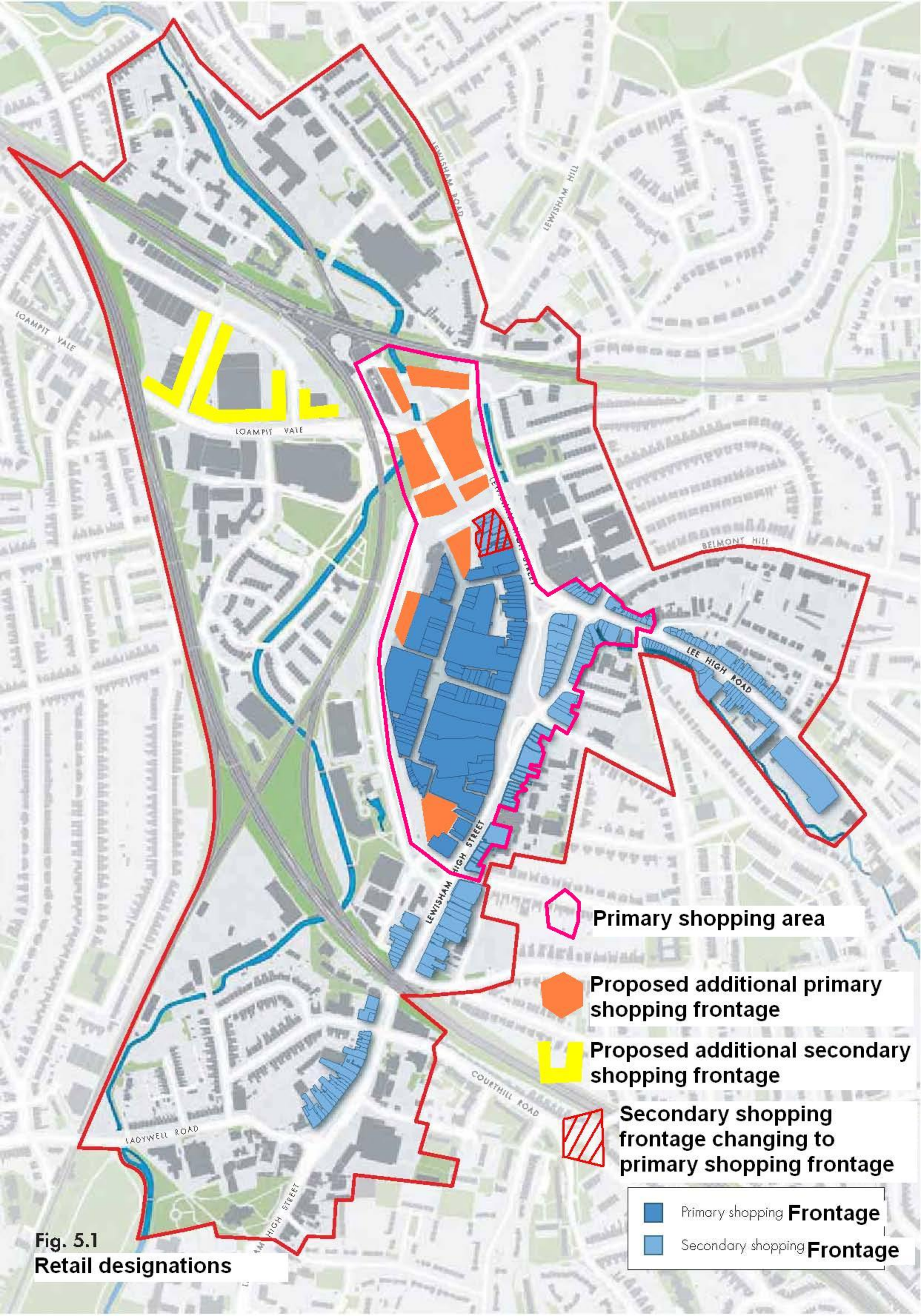


Fig. 3.1

Plan boundaries



Primary shopping area

Proposed additional primary shopping frontage

Proposed additional secondary shopping frontage

Secondary shopping frontage changing to primary shopping frontage

Primary shopping **Frontage**

Secondary shopping **Frontage**

Fig. 5.1
Retail designations