

Public Examination of Development Management Local Plan

London Borough of Lewisham response on the Inspector's Question: DM12 Hotels

The Council proposes an editorial change (SM11) to achieve more clarity, although it seems to me that the Blackheath Society's suggested wording would be a clearer potential 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. Background information

1.1 The Inspector's question relates to Policy DM12 Hotels part e.

1.2 Policy DM12 (submission version November 2013) reads:

"2. The Council will support proposals for new hotels provided that the development:....
... e. provides an adequate level of car parking depending upon the location and the accessibility of the hotel, with lower levels of car parking expected within town centres and in areas where there is good public transport accessibility and a preference for car free development wherever possible"

1.3 During the public consultation of the proposed submission version, the Blackheath Society suggested the following amendment (DMREP14.2, October 2013):

... "e. provides a level of car parking consistent with the location and accessibility of the hotel, taking account of the overall preference for locations in town centres and in areas where there is good public transport accessibility. There is a reduced need for parking in such areas and there is a preference for car free development wherever possible".

1.4 In response to the Blackheath Society's representation DMREP14.2, the Council suggested amending the wording as follows for clarification (SM11, November 2013):

.... e. provides an adequate level of car parking depending upon the location and the accessibility of the hotel, with lower levels of car parking expected within town centres and in areas where there is good public transport accessibility. and **There is** a preference for car free development ~~wherever possible~~.

2. Policy intention

- 2.1 Policy DM 12 Hotels regulates the siting, design and other details of hotel development.
- 2.2 Part 1 of the policy sets out the location preferences for new hotel development; promoting town centre locations and locations where there is good public transport access.
- 2.3 Part 2 of the policy is criteria based, and deals with the design and other details of new hotel development.
- 2.4 Part 2 (e) of the policy requires a level of car parking which is appropriate for the location of a proposed hotel, and requires 'car free' development in areas of good public transport accessibility.
- 2.5 It is accepted that the original wording of part 2 (e) of the policy can be misinterpreted as setting out a preference for hotels to be developed in town centre locations and locations where there is good public transport access. However, this is not the intention of part 2 (e), as part 1 already deals with that same issue. Instead, the intention of part 2 (e) is to ensure that the level of car parking is appropriate to the proposed location.
- 2.6 It is considered that the Blackheath Society's proposed amendment misinterprets the intention of part 2 (e) of the policy as described above. Therefore the Society's proposed amendment replicates part 1 of the policy, and is not considered appropriate.
- 2.7 However, it is also accepted that the Council's suggested modification (SM11) does not sufficiently clarify the policy, leaving the policy open to interpretation. Therefore new, clearer, wording is now proposed. The new wording also has the additional advantage of clarifying what was intended by the term "car free". The proposed new wording is as follows:
- 2.8 **"e. provides a level of car parking appropriate for the site's level of public transport accessibility. Parking provision for developments in areas of high public transport accessibility should be limited to disabled parking, coach parking, taxi parking and other parking required for operational need including deliveries and servicing"**

3. Conclusion

- 3.1 Policy DM12 part 2 (e) intends to ensure that the level of car parking proposed for new hotel developments is appropriate to the proposed location.
- 3.2 However, the policy as worded can be misinterpreted as repeating the location preferences for new hotel development found in DM12 part 1.
- 3.3 Neither the Council's suggested modification SM11, nor the Blackheath Society's proposed amendment, satisfactorily addresses the potential for misinterpretation. Therefore the Council is now suggesting re-wording DM12 (2)(e) in the following way:

- 3.4 ~~“e. provides an adequate level of car parking depending upon the location and the accessibility of the hotel, with lower levels of car parking expected within town centres and in areas where there is good public transport accessibility and a preference for car free development wherever possible”~~
- 3.5 **“e. provides a level of car parking appropriate for the site’s level of public transport accessibility. Parking provision for developments in areas of high public transport accessibility should be limited to disabled parking, coach parking, taxi parking and other parking required for operational need including deliveries and servicing”**