



BNP PARIBAS REAL ESTATE

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6 April 2010

Dear Sir or Madam

LONDON BOROUGH OF LEWISHAM LOCAL DEVELOPMENT FRAMEWORK (LDF), CORE STRATEGY PROPOSED SUBMISSION VERSION, FEBRUARY 2010

RE: LAND AT CORNER OF BROMLEY ROAD & RANDELSDOWN ROAD, CATFORD, SE6

On behalf of our client, EU Developments, we welcome the opportunity to comment on the above named consultation document. These representations are made to the 'soundness' of the Plan, with specific reference to our client's site located at 202-210 Bromley Road, Catford and the wider 'corner site' of the Bromley Road industrial estate at the junction of Bromley Road and Randlesdown Road. Reference is made to the site and how it and its location have been judged in comparison to other sites to demonstrate that the Plan is fundamentally *unsound*.

1. BACKGROUND

1.1 Subject Site

The site lies within the Bromley Road industrial estate and is allocated as Strategic Industrial Land (SIL) in the emerging Core Strategy, along with all the land in this stretch of Bromley Road, as far south as the parade of retail units fronting onto Randlesdown Road.

Our client's site extends to approximately 0.57 hectares and is currently occupied by a mix of uses including vacant industrial buildings (class B2), a car sales operation (sui generis), an office (class B1) and residential units (class C3). The wider site extends to a further 0.44 hectares and includes a scaffolding yard (class B8 or sui generis) and a parade of retail shops (class A1), giving a total redevelopment site of approximately 1.0 hectare. The area of our client's ownership is shown in red on the plan below, with the additional area with potential shown in blue.

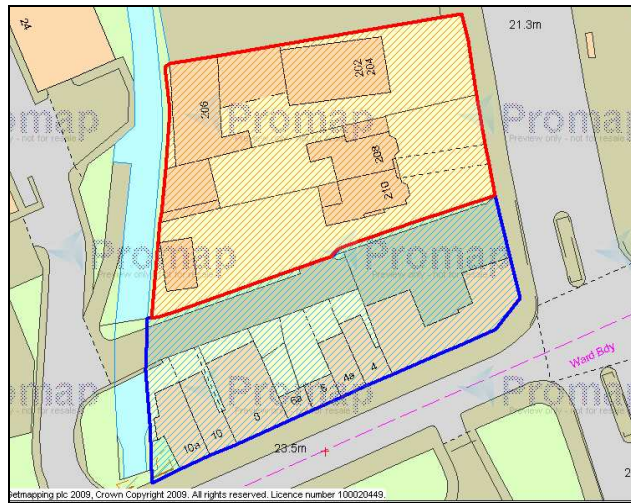


Fig 1. Site Plan

In its current form the site is underutilised and in need of re-development to make positive use of the site, which has predominantly been vacant for over two years. Together with the adjoining land forming the corner site, redevelopment of the whole would make best use of its prominent, gateway, location at the junction of the Bromley Road and Randlesdown Road.

The sites are located within the Bromley Road Industrial Estate and are currently designated in the London Plan and the Lewisham Unitary Development Plan, adopted July 2004 (saved policies) as a Strategic Industrial Location (SIL) and a Defined Employment Area (DEA) respectively. They are also designated as a Strategic Industrial Location (SIL) in the emerging LDF Core Strategy.

As identified above, 202-210 Bromley Road is in need of re-development as the current premises do not make the best use of the land and following a fire in the unit at 202-204 Bromley Road, the cost of refurbishing the buildings and bringing them to modern day occupational standards is simply not viable, in relation to the market rent achievable in the current economic climate. This has been ratified through review of building condition and the cost implications of repairing and refurbishing the existing premises, carried out by an independent Quantity Surveyor. A copy of this report is available upon request.

In light of the above situation, we consider there is an opportunity for a more comprehensive redevelopment of the wider, prominent corner site, including our clients' land, at the corner of Bromley Road and Randlesdown Road. Taken as a whole, there is more flexibility and as such the site's full regeneration potential can be achieved. It is considered that the redevelopment of our clients' site alone (202-210 Bromley Road) is both less attractive and more difficult to achieve if the scaffolding use were to remain in situ. A comprehensive development has the potential to deliver greater visual, environmental and development benefits for the area, as the scaffolding site occupies a prominent position on a key gateway into Lewisham.

1.2 Previous Consultation on Core Strategy

The Consultation Statement published in February 2010 serves as a record of the consultation undertaken by the Council in preparing its Core Strategy. This document sets out the following information with regard to the consultation responses received at each stage with respect to Employment Land.

1.2.1 Issues and Options Papers October 2005 (Regulation 25)

Papers were published covering eleven topics and also included issues relevant to Development Control policies. The Council consulted on these topic papers in four stages. Part 2 related to Open Space and Biodiversity, Employment and Transport Issues and Options papers. Comments



received with relation to employment uses are summarised within the Consultation Statement as follows:

“responses to the option to retain or redefine the land allocated as Strategic Industrial Locations were evenly split between a need to recognise that some sites have outlived their usefulness, and the need to retain land for strategic purposes.

- Most responses in relation to locally significant employment land were in favour of making an individual judgment on retention based on the quality of the site.
- The majority of respondents considered that mixed use on former employment sites was preferable to use of the sites for 100% housing.”

1.2.2 Preferred Option 2007 document ‘People, Places and Spaces’ (Regulation 26)

Comments received with relation to employment uses are summarised within the Consultation Statement as follows (our emphasis added):

- Many landowners and redevelopers commented that land currently designated as Strategic and Local Employment Land (i.e. office, industry and warehousing) could and should be re-designated for housing use or mixed use development.
- Government Office for London stated that it was not clear what the demand for employment land was in the borough.
- Specific comments were made objecting to the inclusion of sites within Strategic Industrial Locations. It was considered that these designations should be based on evidence of demand, and that all employment locations should be considered for mixed use. One landowner supported the protection of employment locations.
- The GLA commented that release of land from Strategic Industrial Location designation should be done through the development plan process based on an Employment Land Study.

1.3 Government Policy Approach

Planning Policy Statement 12: Creating strong safe and prosperous communities through Local Spatial Planning (PPS 12) sets out in paragraph 4.52 “to be ‘sound’ a Core Strategy should be:

- 1 Justified;
- 2 Effective; and
- 3 Consistent with National Policy.”

Paragraph 4.636 in PPS 12 goes on to identify that in order for Core Strategies to be ‘justifiable’, “they must be:

- founded on a robust and credible evidence base; and
- the most appropriate strategy when considered against the reasonable alternatives.”

Paragraph 4.44 in PPS 12 states that to be ‘effective’, Core Strategies “must be:

- deliverable;
- flexible; and
- able to be monitored.”

1.4 London Borough of Lewisham’s Approach to Assessing Employment Sites in its Evidence Base



Following the GLA's requirement for an Employment Land Review (ELR) to be undertaken, Roger Tym and Partners (RTP) was commissioned by the Council to produce an ELR in 2008. This Report sets out that the employment sites in the borough were "assessed based only on their fitness for purpose in matching market requirements of business occupiers". The document goes on to identify that in line with the Government's guidance on Employment Land Study's (2004), they undertook a property market assessment of areas on the basis of the following criteria:

- General location – location of the area from a sustainability perspective, assessing its location relative to urban/town centres. e.g. whether it is in an edge of centre or out of town location, its accessibility by a choice of means of transport and the proximity of facilities that would be of benefit for existing or future occupiers.
- Accessibility – proximity of a site to the public transport network and good quality roads, which are important locational factors both for industrial and office occupiers and the quality of the area/site in terms of its local access characteristics, e.g. whether it is located on near unclassified roads, or constrained by congestion or other physical factors.
- Environment – nature and extent of the area's neighbouring uses and in particular, the likely risk of conflict arising from existing or potential future employment uses of the area and review of the internal environment of employment areas, with regard to prominence and internal layout of the employment area. It also considers whether there are potential areas of risk that are likely to influence the cost of future development, such as contamination, environmental or conservation issues (eg, listed status, floodplain, area of landscape value, etc).
- Market conditions/perception and demand – looks at recent market activity, likely market demand and the level of vacancy within the area, in terms of either vacant floorspace or land that is disused or derelict.

2. REPRESENTATION

EU Developments consider that the London Borough of Lewisham's Core Strategy Proposed Submission Version is currently *unsound* on the basis that the document is not justified or effective and in some cases inconsistent with National Policy. This is evidenced in the assessment of a range of sites and the decisions made in relation to the retention as SIL or otherwise reallocation to residential use or mixed use, which is wholly inconsistent with the approach adopted for sites in similar situation, or far worse position, than the sites recommended to be reallocated. This is especially so when the approach to the subject site, 202-210 Bromley Road, is taken into account against the sites referenced below, and the apparent justification for its retention in a SIL allocation. We set out in detail our **objection** to the document and our concerns over its soundness.

2.5 Core Strategy Soundness Test 1 - Justified

As identified in section 1.3, for a Core Strategy to be "justified" it must be "*founded on a robust and credible evidence base*". Following a review of RTP's 2008 Employment Land Review we consider that the recommendations for retention or loss of the designated employment sites has been pre-determined by the Council to meet regeneration aspirations as opposed to being based on the actual findings of the sites. Further a number of good, well performing and actively sought after sites within existing SEL allocations (the equivalent of SIL in the new Core Strategy) are proposed by RTP to be lost from the new SIL allocations, despite RTP's findings that are contrary to the recommendation.

This appears to be simply to accord to the Council's pre-determined decision to re-designate these broad areas from strategic employment land, as mixed use redevelopment sites without due process or justification, at the expense of other sites requiring reallocation to stimulate investment in them. Prime examples of this abuse of the process and actual results of the Study are Arklow Road and Childers Street DEA, Bolina Road DEA, Rollins Street and Stockholm Road DEA. We set out further details of the aforementioned sites in the table below, highlighting pertinent issues which we consider identify that, despite RTP's assessment that these sites are still useful sources



of employment in the Borough, they have been identified to come forward for mixed use redevelopment (our emphasis added).

Site	Comments in RTP's report
<p>Arklow Road and Childers Street DEA</p>	<p>While Arklow Road <u>adds to a concentration of employment activity, its allocation may need to be balanced with its potential for encouraging wider regeneration</u> in this part of the borough.</p> <p>The redevelopment for the site will include the demolition of the existing estate and the replacement of the Childers Street buildings with a <u>residential-led scheme providing an equivalent amount of employment space, together with 200 residential units.</u></p>
<p>Bolina Road DEA</p>	<p>The site provides a <u>well managed and useful pool of small industrial premises in a location that is well-suited to such uses. There is clearly a demand for units on the site;</u> and the buildings, although thirty years old, appear suited for continued use into the future.</p> <p><u>It should be noted that the Deptford New Cross Masterplan identifies this DEA for a comprehensive redevelopment that takes in Enterprise Estate, replacing it with high density housing up to 40 storeys alongside commercial uses.</u></p>
<p>Rollins Street and Stockholm Road DEA</p>	<p>The area is a <u>significant and established source of employment land and buildings.</u> However, most of the area south of Surrey Canal Road requires significant refurbishment or redevelopment, and the units along Stockholm Road appear to have an uncertain future. The <u>area will require new investment if it is to retain its role as a location for industrial employment.</u></p> <p>Together with Bolina Road and the area around Millwall Football Ground, this DEA is one of six sites in the borough <u>identified for mixed used development as part of the Deptford New Cross Masterplan.</u> The plan envisages the demolition of all the existing employment buildings as part of a <u>residential-led scheme creating 2,700 residential units.</u></p> <p>The proposals represent a radical transformation of what is currently a General Industrial Area. As with other sites in the Masterplan, the proposals for this site suggest mixed employment and residential buildings. Again, this <u>does not seem to exploit the site's scale to provide distinct business buildings</u> adjacent, rather than integral, to residential buildings.</p> <p>The plan envisages the demolition of most of the existing built space on the site and its <u>replacement with an equivalent amount of new employment space, together with 950 residential units up to 15 storeys high.</u></p>

The Core Strategy must also provide the “*most appropriate strategy when considered against the reasonable alternatives*” to be sound. We consider that our client’s site, 202-210 Bromley Road and the adjacent premises at the corner of Randlesdown Road and Bromley Road is comparable to several of the SIL sites in the north of the Borough, which have been identified for release into mixed use and as such it is considered to be a reasonable alternative site which the Core Strategy has not addressed.

Considering the prominent location and the *existing* mixed use (including residential apartments) on the site, it is considered that retaining the site in a SIL use is an inappropriate strategy as it has not in the past served a SIL function. Further the site would provide benefits to the wider area were it to come forward for regeneration as part of a holistic mixed use redevelopment. The RTP’s Employment Land Review identifies that “*this site could benefit from an improvement in its physical condition and provide a high quality development at this significant local road junction.*”



Site	Comments in RTP's report
<p>Blackhorse Road and Grinstead Road DEA</p>	<p>The <u>buildings and the uses</u> accommodated on Grinstead Road are of <u>poorer quality than the rest of the DEA</u>. A large fire has <u>destroyed part of the site</u>, and <u>damaged many of the other buildings</u>. The site is <u>occupied by various warehousing uses, a scaffolding yard</u> and Neptune Chemical Works there is also external storage and general untidiness. The <u>buildings on Grinstead Road do not present a positive appearance</u> to the boundary of Deptford Park.</p> <p>The Grinstead Road part of this DEA is one of the six sites in the borough <u>identified for mixed used development</u> where the <u>existing employment uses will be replaced with an equivalent amount</u>, as well as the development of <u>160 residential units</u>.</p>
<p>Oxestalls Road DEA</p>	<p>It <u>currently accommodates a range of occupiers</u>. It is however an <u>untidy site that lacks coherence</u>. Furthermore, the commercial uses on the site <u>do not meet its full employment potential, and several are incompatible with the wider environment</u>. It does therefore represent a longer-term opportunity for a planned employment location, with an upgrade in the quality of some of the uses on the site.</p> <p>Oxestalls Road is one of six sites in the borough <u>identified for mixed use development</u> as part of the Deptford New Cross <u>Masterplan</u>.</p>

As such there are grave concerns with regard to the robustness of the Core Strategy's policies as they are not based on the evidence but the Council's pre-determined decision to relocate land to the north of the Borough.

2.4 Core Strategy Soundness Test 2 - Effective

The second test of soundness is the requirement for a Core Strategy to be "effective". In order for a Core Strategy to be effective it needs to demonstrate deliverability.

It is highly questionable whether the redevelopment of the corner site of the Bromley Road SIL to provide purely employment uses is deliverable given the existing mixed use nature of the sites and the fragmented ownership. RTP's ELR identifies this issue, *"From a market perspective, it should be stressed that this SIL is a collection of sites, somewhat lacking in cohesion, rather than a single site."*

The blanket protection of the entire Bromley Road Industrial Estate site has been adopted for the sole purpose of preserving a mass of employment space in the south of the Borough, irrespective of its past and current under utilisation, negative appearance, lack of market attraction and poor environmental condition . This without consideration of the provision of similar land in surrounding boroughs which form part of SE London's offer as a whole, nor the GLA advice that Lewisham should allow the loss of circa 49 Ha of industrial land due to excess provision on the wider southern London market.

The assessment of the subject site in RTP's ELR identifies that the site presents a major opportunity for employment provision in a redevelopment scenario, however, it does not assess the likelihood of this redevelopment going forward given the actual site circumstances, the current economic climate and the need to enable development. Neither has the Council acknowledged that the current land uses such as the bus and police garages are not likely to relocate, releasing these sites for redevelopment, unless they are offered enough money to incentivise and fund their relocation.

The site's use has not changed since it's incorporation within the designated SIL boundary and remains in mixed use. Clearly the location of the Bromley Road SIL boundary is inappropriately



located. Indeed, prior to 1996 the corner site (as identified in these representations) was not included in the Bromley Road SIL Boundary. Following its inclusion, we understand that the Council considered its removal from the employment land designation in the early stages of revising the replacement UDP. However, this was not pursued following the identification of a move to a new plan format.

It is considered that retaining the SIL designation on this portion of the site will not achieve the Councils or indeed the Government's aims as set out in PPS4, Policy EC2 Planning for Positive Economic Growth, which requires that "local planning authorities ensure that their development plan...sets out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth...". Further, "...Existing site allocations should not be carried forward from one version of the development plan to the next without evidence of the need and reasonable prospect of their take up during the plan period. If there is no reasonable prospect of a site being used for the allocated economic use, the allocation should not be retained and wider economic uses or alternative uses should be considered." In light of the guidance provided by PPS 4 and the Council's maintaining the mixed use corner site within the Bromley Road SIL, it is considered that the plan is in this respect inconsistent with National Planning Policy (Core Strategy Soundness Test 3) and the GLA strategy as set out in the Industrial Capacity London Plan (consolidated with alterations since 2004) Supplementary Planning Guidance March 2008 which identifies the loss of 49 ha of SEL in Lewisham.

To be effective a Core Strategy also has to demonstrate that it is "flexible". Policy EMP3 in the adopted Unitary Development Plan sets out 9 tests that are required to be satisfied in order for a site to be developed for a non-employment use when situated in a Defined Employment Area. Spatial Policy 5, Areas of Stability and Managed Change in the proposed submission Core Strategy, which will replace policy EMP3, does not provide any circumstances or tests which would allow a site to come forward for alternative redevelopment once designated as an employment site. Flexibility of policies is also supported by PPS 4, which identifies that Local Authorities' development plan policies "should be flexible enough to...allow a quick response to changes in economic circumstances". As previously identified, it is considered that this policy in the Plan does not meet with the Core Strategy Soundness requirement of consistency with National Planning Policy.

When considering the subject site against the criteria within the adopted policy EMP3, it is clear it does not meet the role of land to be allocated as SIL, for the reasons set out below:

Exception set out in Policy EMP 3	How The Re designation/Redevelopment Meets The Criteria
(a) other appropriate employment generating uses, especially those supportive of the business/industrial function of the area which do not conflict with the other policies in this Plan;	The re-designation/redevelopment proposed includes a more intensive amount of employment uses to be provided on the site including B1 and sui generis uses.
(b) the number of jobs likely to be created by the proposal;	Considering the site is currently under utilised and is to be more intensively used it will generate a higher level of jobs than currently catered for on the site.
(c) the length of time the site has been vacant, and demonstration by any applicant that the site has been actively and appropriately marketed for business/industrial reuse or redevelopment;	Unit 206 has been vacant and we are advised that it has been marketed for approximately 5 years for business/industrial reuse or redevelopment. Unit 202-204 has recently suffered fire damage and has been vacant for approximately 6 months.



<p>(d) any provision within an approved Planning Brief;</p>	<p>There is no planning brief covering this area in great need of redevelopment. It is proposed that the area would benefit from a planning brief to ensure its appropriate regeneration.</p>
<p>the building cannot be economically converted to a modern business or industrial use;</p>	<p>As evidenced by the recent review of the buildings' condition and the cost implications of repairing and refurbishing the existing premises, carried out by a Quantity Surveyor, the refurbishment of the premises would cost in the region of £800,000. The current value of the property for a freehold sale or as an investment would not generate a enough value to incentivise someone to purchase the site and undertake the repair and refurbishment of the buildings on site. The units have therefore reached the end of their economic lives and the site requires redevelopment.</p>
<p>(e) development which meets significant local and regional regeneration objectives, especially within Town Centres;</p>	<p>Bellingham is identified as an area with much deprivation and is in need of redevelopment. The UDP aims to direct resources towards this area (amongst others) and improve conditions for those living within them. The holistic redevelopment of this site would be able to provide a range of regeneration objectives including providing a larger amount and better employment opportunities, better local retail facilities and housing as well as improve the physical and visual environment of this prominent site and its impact upon the community. Further, the total site extends to 1 ha; even if this is lost from industrial use, it is just 2% of the land Lewisham is required to <u>release</u> from industrial use in the period to 2026. It would not prejudice the quantity of land available. The current quality of the site and units as an employment offer is very poor. Therefore loss will not adversely prejudice the quality of employment land available.</p>
<p>(f) the impact the proposals would have upon the range and quality of available employment sites;</p>	<p>The re-designation to mixed use proposes a larger and more modern amount of employment floorspace than is currently catered for and as such is considered to have insignificant to no impact upon the range and quality of available employment sites;</p>
<p>(g) the impact the proposals would have on the continuing industrial functioning of the area;</p>	<p>The site currently has employment, residential and retail uses on it. As such the redevelopment would not be significantly different to what is currently on the site. The site is not an integral element of the SEL, in fact it is an ad hoc collection of uses at the periphery. It contributes little in terms of quantity or quality floorspace or uses to the SEL. It is also considered that there is space to provide a buffer between the site and the bus garage to improve the mitigation of impact between the sites.</p>



<p>(h) demonstration by the applicant that there is no demand by an employment land assessment.</p>	<p>An employment land review was prepared in late 2008, early 2009 which identified a large amount of vacant employment space (well above the frictional level of vacant space required to sustain the market) both within the area and more importantly within the Bromley Road SEL itself.</p>
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2.3 Proposal

Considering the existing mixed use nature and the current circumstances of the overall site as set out above, we consider that the entire corner site of the Bromley Road Industrial Estate as identified in red and blue in Fig 1 be removed from the Strategic Industrial Land designation and be re-designated as:

- 4 An area of mixed use within the Bromley Road Industrial Estate.
- 5 A Mixed Use Opportunity Site (MUOS) capable of providing a range of uses, including:
 - a new parade of shops, with residential above on, Randlesdown Road, to the height of the residential development opposite; and
 - commercial use on the ground and/or first floor at the corner of Randlesdown Road and Bromley Road and on the site of 202 – 210, fronting Bromley Road (this could be new offices, car showroom, or similar) with residential apartments above each element.

Further to our comments above, we set out in Appendix 1 an appraisal of the subject site, which further assesses the reasons why we consider that it should be designated as a Mixed Use Opportunity Site in the emerging Core Strategy.

We reserve the right to amend or supplement these representations at a later date if necessary. Please acknowledge receipt of these representations as duly made. Please also advise us as to the next stages of the emerging Land Allocations DPD.

Please do not hesitate to contact either my colleague Sacha Ferreira (020 7338 4417 sacha.ferreira@bnpparibas.com) or myself at this office, should you have any queries.

Yours faithfully

Steve Walters
Director



Appendix 1: Assessment of Proposed Site

A1.1 National Policy/Guidance

The re-designation/redevelopment of the site will in our view comply with National Policy as set out in the table below:

Policy Document	How The Re designation/Redevelopment Accords with the Guidance
PPS1 – Delivering Sustainable Development	<ul style="list-style-type: none"> • Urban regeneration improving the well being of communities and facilities • Mixed use development in a location that allows the creation of linkages between different uses and can thereby create a more vibrant place • Promoting high quality and safe development • Creating new opportunities for the people living in the nearby communities • More efficient use of land through higher density, mixed use development and the use of suitably located previously developed land and buildings • Actively bringing vacant and underused previously developed land and buildings back into beneficial use to achieve Government targets
PPS3 - Housing	<ul style="list-style-type: none"> • Re-use of vacant and derelict sites or industrial and commercial sites for providing housing as part of mixed-use development, • Makes effective use of land by re-using previously developed land., which will assist in meeting the national annual target that at least 60 per cent of new housing should be provided on previously developed land. This includes land and buildings that are vacant or derelict as well as land that is currently in use but which has potential for re-development • Considering whether sites that are currently allocated for industrial or commercial use could be more appropriately re-allocated for housing development
PPS4 – Planning for Sustainable Economic Growth	<ul style="list-style-type: none"> • Will assist in achieving the Government's overarching objective of sustainable economic growth. • Site lies within an area with high levels of deprivation and should be prioritised for regeneration investment. • Makes the most efficient and effective use of land, prioritising previously developed land which is suitable for re-use. • Existing site allocations should not be carried forward from one version of the development plan to the next without evidence of the need and reasonable prospect of their take up during the plan period. If there is no reasonable prospect of a site being used for the allocated economic use, the allocation should not be retained, and wider economic uses or alternative uses should be considered



A1.2 Regional Policy/Guidance

Policy Document	How The Re designation/Redevelopment Accords with the Guidance
<p>The London Plan (consolidated with alterations since 2004) February 2008</p>	<ul style="list-style-type: none"> • Assists with achieving an efficient use of surplus industrial land to help meet strategic and local requirements for a mix of other uses such as housing and social infrastructure and contributes to the renewal of the area • The site does is not of suitable quality and fitness for purpose of location within a SIL • Considering the high vacancy rates and the lack of interest in the site during marketing it is considered that there is not sufficient industrial demand to justify the retention of the site and as such the release of this site's current restrictive designation to provide a better use of the site is in line with Regional Policy • Accords with Policy 3A.2 Borough housing targets by identifying a source of supply having regard to: the change of use of surplus industrial or commercial land to residential or mixed use development • In line with Policy 4B.1 Design Principals for a Compact City as it maximises the potential of the site providing for and enhancing, a mix of uses.
<p>Industrial Capacity London Plan (consolidated with alterations since 2004) Supplementary Planning Guidance March 2008</p>	<ul style="list-style-type: none"> • Securing efficient and effective use of land, environmental improvement and wider sustainability objectives • SILs must be subject to periodic review to reconcile demand and supply • Having regard to the net reduction in land demand and the careful management of vacancy rates, there is scope to release an average of 41 hectares per annum between 2006 and 2026 as a result of declining demand for industrial land and rigorous management of vacancy rates • Some SIL land in parts of North East and South East London, has been identified as having scope for strategically coordinated further release • Lewisham is identified as having an industrial land release benchmark of 49 hectares between 2006 and 2026. • Land released as a result of such consolidation exercises is required to be re-used to meet strategic as well as local priorities with housing (including affordable housing) and appropriate mixed development being the key priority • Mixed-use consolidation should be focussed on the periphery of SILs near to public transport nodes or town centres. The SPG provides that good public transport access is an essential pre-requisite for intensification and mixed-use redevelopment.

A1.3 Local Policy/Guidance

A1.3.1 Lewisham UDP - Policy EMP3

The main policy currently governing the Defined Employment Areas is Policy EMP 3. We consider that the re-designation of the site for mixed use redevelopment meets the criteria identified in the policy when considering exceptions to this policy. We have already set out in a table in the main body of the representation our assessment of how the re-designation and development of the subject site meets the criteria.



A1.3.2 LB Lewisham Employment Land Study by Roger Tym and Partners November 2008 (LDF Evidence Base)

The subject site has been assessed using the criteria recommended by the Government Guidance to assess employment sites. It is considered that the site is well located near good public transport links and is surrounded by a mixture of uses including retail, employment and residential. The environmental quality of the site is quite varied but for the most part is in need of extensive refurbishment and more likely redevelopment to make the best use of the site and bring it back up to modern day occupational standards.

It would appear that all SIL sites/parts of the SIL sites which have been considered for mixed use development is primarily due to their location within the Deptford Newcross Masterplan area and not on the sites' individual characteristics (in particular see Bolina Road DEA and the Rollins Street and Stockholm Road DEA in the table below).

In light of this, despite the positive benefits to the Borough that mixed use redevelopment will bring and the comparable nature of the corner site at the Bromley Road Industrial Estate to these other SIL sites, the subject site has not been recommended or even considered for mixed use redevelopment (in particular see the Grinstead Road DEA and the Oxestalls Road DEA in the table below). We attribute this oversight to the restricting effect of the predetermined amount of land released for mixed use redevelopment in the northern part of the borough is having on the amount of SIL land viewed as permissible to be lost to mixed use redevelopment within the Borough as a whole. This is further demonstrated by RTP's comments on the Bolina Road DEA and Rollins Street and Stockholm Road DEA sites, where despite the demand for units on these DEAs and their successful use for employment currently, they are identified for mixed use re-development. RTP consider such re-designation to be "a radical transformation of what is currently a General Industrial Area".