

DP2591/OS/CET

9 April 2010



Planning Policy
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Dear Sir

CORE STRATEGY: SUBMISSION DOCUMENT

We are instructed on behalf of our client, Land Securities, who own and operate 'The Lewisham Shopping Centre' in Lewisham town centre, to make representations in respect of the LDF Core Strategy Submission Document. You will appreciate that as a significant landholder in Lewisham town centre, our client is to be regarded as a major stakeholder.

Land Securities welcome the opportunity to make representations on this document, which will play a key role in the shaping the future of Lewisham. The support within the Core Strategy for a significant quantum of new and improved retail and mixed use development within the town centre is welcomed.

Our more specific points are set out below.

Para 2.30

This outlines a requirement for an additional 20,000 sq.m minimum of retail floorspace and an objective to achieve Metropolitan Status for Lewisham. Whilst this objective is supported, it should be noted that the definition of a Metropolitan Centre expands further than just retail. These should also be met in order for the Centre to be 'promoted' within the retail hierarchy.

Objective 1

This policy is supported and considered to be sound. The regeneration of Lewisham town centre is key to achieving the targets and objectives set out within the emerging Core Strategy.

Objective 4

Whilst this objective of achieving Metropolitan Status by 2026 for LTC is supported, it should be noted that the definition of a Metropolitan Centre expands further than just retail. In order to comply with policy as set out within the London Plan the aspirations in respect of achieving Metropolitan Status should be expanded.



Spatial Policy 1

- 2: The hierarchy for development as set out within this policy is supported.
- 6: Whilst the Council's objectives to make improvements to the appearance of the Borough are welcomed, the policy should acknowledge that planning obligations, in accordance with Circular 05/05 which outlines that planning obligations must be
 - (i) relevant to planning;
 - (ii) necessary to make the proposed development acceptable in planning terms;
 - (iii) directly related to the proposed development;
 - (iv) fairly and reasonably related in scale and kind to the proposed development; and
 - (v) reasonable in all other respects.

It is considered that this policy must be worded so as to ensure that Developers are only required to contribute to the provision of social and transport infrastructure relevant to a proposed scheme, and are not expected to pay for this out right. At present this policy is unsound as it does not comply with National Planning Policy.

Spatial Policy 2

- The provision under this Policy CP2 for further guidance to be prepared for Lewisham town centre under Area Action Plans is welcomed.
- Strong support for additional floorspace required within Lewisham Town Centre, particularly for retail floorspace.
- The document does not set out sufficient guidance on the definition and location of the Local Employment Location. This should be expanded to ensure that the policy is sound.
- The emphasis on the Gateway scheme alone to deliver the regeneration of the Town Centre is questioned, it is considered that the policy should seek to support wider redevelopment proposals within the town centre. At present it is considered that this element of the policy is unsound as it does not provide sufficient flexibility to deliver the wider aims of the Core Strategy for the Gateway site.
- The focus is on achieving additional retail floorspace to obtain Metropolitan Status – however there are other requirements under the definition of Metropolitan Status. Our client strongly supports proposals to encourage the growth of Lewisham to elevate its status of that of a Metropolitan Town Centre in the London retail hierarchy, as set out within Policy.

Core Strategy Policy 1

- 2) The affordable housing requirement should be assessed on site by site basis and it should be clear within the policy that this is 'up to 50%.' The London Plan (as amended 2008) at 3A.10 states that the delivery of affordable housing as part of any development should be applied flexibly '*taking account of individual site costs, the availability of public subsidy and other scheme requirements*'.



This is clarified further at Para 3.52 which states *'In estimating provision from private residential or mixed-use developments, boroughs should take into account economic viability and the most effective use of private and public investment, including use of financial contributions.'*

At present this policy is unsound as it does not provide sufficient flexibility to ensure development can come forward across the Borough.

- 5) The policy must reflect that some sites maybe not be suitable for family accommodation.

Some weight should also be given in considering the proposed mix of any development to the needs and requirements of a related Housing Association in order to ensure that new development coming forward delivers new accommodation to meet the actual requirements of people on waiting lists for new housing within the Borough.

Furthermore, it should be acknowledged that in order to make residential proposals economically viable in areas identified as appropriate for family accommodation, there will be a requirement to include some smaller 1 or 2 bedroom residential units. This also adds to the choice of accommodation within the area, allowing younger people moving out of home or older people looking to down size to stay within their local area.

As currently drafted this policy is unsound and should be amended to remain flexible in order to ensure it can be delivered, taking into account site specific considerations.

- 7) It is considered that this table is unclear as to how this is balanced against a 30:70 split.
- 9) The criteria set out within this policy are also relevant to mix within other tenures as well as private. This should be acknowledged.

Policy 6

This policy needs to be updated to reflect PPS4. As currently drafted this is unsound as it does not comply with National Planning Policy.

Policy 8

- 2) It should be acknowledged within this policy that this will be subject to feasibility and viability. Each site must be considered on its own merits.

Furthermore, the policy should acknowledge that in some instances that a 20% reduction in CO2 emissions from on site renewable energy may not be achievable. This would ensure that the Policy is consistent with Policy 4A.7 of the London Plan. This policy states that *'The Mayor will, and boroughs should, in their DPDs adopt a presumption that developments will achieve a reduction in carbon dioxide emissions of 20% from on site renewable energy generation (which can include sources of decentralised renewable energy) unless it can be demonstrated that such provision is not feasible.'*



At present the policy is unsound as it is not sufficient flexible.

Policy 15

- a) The reference within the policy to central density levels in Lewisham town centre is supported. However it is considered that the policy should acknowledge that there may be some circumstances where this is exceeded.
- b) Support for tall buildings within Lewisham town centre.

Policy 17

- b) As currently drafted the policy does not outline the mechanism for determining local views. This should be clarified. As drafted this is unsound.

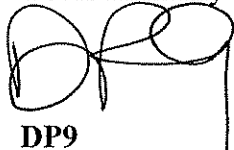
Policy 18

- i) The current drafting within this policy promoting tall buildings in Lewisham Town Centre is supported.

Our client reserves the right to appear at the Examination in Public in respect of the above issues.

We trust that these representations will be taken on board. If you require any further information or clarification regarding the above please do not hesitate to contact Oliver Sheppard or Caroline McIntyre

Yours faithfully



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