



# **Lewisham Local Plan**

**Examination Hearing Sessions**

**Response to Actions**

**Matter 6: Town Centres (Policies EC12 and EC13)**

**Prepared to inform the Local Plan Examination**

**November 2024**

## 1. Introduction

- 1.1 This Paper is one of a short series that provides the London Borough of Lewisham's (the Council's) response to further actions raised through the Inspectors' post hearing letter (IN5).
- 1.2 The Paper seeks to respond to a specific request for further information that follows up on discussions during the examination hearing sessions, on Tuesday 25<sup>th</sup> June 2024, that focused on Matter 6 Employment.
- 1.3 The Paper contributes towards the Council's response to the request for further information raised under Matter 6 Employment; it provides a continuation to the submitted document Response to Actions on Matter 6 Employment (LC46 and LC46A).

## 2. Town Centres (Policies EC12 and EC13)

**Inspectors' Post-Hearing Letter Information Request** –the Inspectors have made a further request for information/ clarification in their Post-Hearing Letter (IN5) that relates to Matter 6 Policies EC12 and EC13. Their request comprised the following –

*“It is noted that the household survey had not been updated within EB24 Lewisham Retail Impact Assessment and Town Centre Trends Study (2021), relying instead on the 2015 survey. As such it is not clear as to how the study responds to more recent trends, such as the increase in online shopping and more recent patterns in household expenditure.*

*Additional information on the increase in expenditure in locations within Lewisham has been presented in paragraph 4.2 of the Council's response to AP50, which cross refers to paragraph 3.8 of the 2021 Study. However, this relates to the Experian national expenditure data which has been applied to forecast overall expenditure in the Borough. Whilst this data reflects recent national trends, without updating the household survey it is not clear how changes to shopping and leisure patterns (i.e. the distribution of the overall forecast expenditure at locations and stores across the Borough) have been taken into account. The information presented at paragraph 4.2 of the response to AP50 appears to have been drawn from a different study and does not answer the question set out in AP50. Can the Council clarify its response?*

*Given that the household survey was not updated, this should be a priority for an update of the 2021 Study in order to inform the review of the Plan.*

*In addition, the 2021 Study only covers the period to 2035 and not the entire Plan period. We acknowledge the dynamic nature of the retail sector and that it is difficult to predict retail expenditure in the longer term. However, an update of the 2021 Study should be a priority to inform the future review of the Plan”.*

- 2.1 In response, the Council acknowledges and accepts that it will be necessary to update the Household Survey (2015). It is agreed and anticipated that an update and review of the Household Survey will form a necessary part of the technical evidence that will be prepared in support of a future review of the Lewisham Local Plan. For clarity, that is the next iteration of the new Local Plan that is the subject of the examination. A review will provide a more accurate picture of how changes to shopping and leisure patterns affect the need for additional retail floorspace within the Borough.

- 2.2 Nevertheless, the Council contends that the current Lewisham Retail Impact Assessment and Town Centre Trends Study 2021 (EB24) does explore trends, such as increased online shopping. In this respect the Council directs the Inspectors to the Retail Assessment's Paragraphs 3.11 to 3.13, which confirm that the updated forecast has been adjusted to reflect specific forms of trading (i.e. online shopping).
- 2.3 The Council recognises that the adjustments applied, within the Assessment, for specific forms of trading are based on national trends rather than local shopping patterns and behaviours. However, it is argued, that does not mean that the national trends do not apply to Lewisham. This is particularly the case in that most of the Borough's town centres vacancy rates closely align with the national average of 14.6%. The Council maintains that this is clearly set out and demonstrated in the Retail Assessment (EB24).
- 2.4 For further clarity on this matter, the Council highlights that Lewisham is not alone in not undertaking a recent household survey to inform its retail need assessment - instead adopting Experian's latest national expenditure growth and home shopping projections. For example, Enfield's Local Plan - currently at examination - also took this approach. There are a number of reasons why local planning authorities are taking this approach – possibly, due to the cost and time required to carry out updated household surveys.
- 2.5 The Council contends that whilst its Response to Matter 6 Action 50 Paragraph 4.2 (LC46) does not directly answer the question, it provides valuable insight of the long-term impact the Covid-19 pandemic had on town centre spending across the Borough. It is noted that the evidence suggests that the impacts may not be as severe as initially thought.
- 2.6 Overall, it is the Council's position that there is modest scope for new retail development within the Borough. This is inclusive of additional retail uses incorporated in the redevelopment of town centre site allocations. Delivery will ensure that new communities are supported, that centres continue to remain vital and viable, that centres such as Catford secure necessary regeneration, and that Lewisham town centre achieves metropolitan status. The Council considers that, in turn, this will secure successful and sustainable placemaking that is in accordance with the new Local Plan's spatial strategy, is in general conformity with the wider objectives of the London Plan and is in accordance with national planning policy objectives.
- 2.7 Finally, the Council highlights that there are further potential benefits and opportunities that are brought to this issue following the introduction and implementation of the Class E main town centre uses<sup>1</sup>. It is considered that the Class E uses can help landowners and leaseholders quickly respond to market signals and keep business units viable.

---

<sup>1</sup> The Council considers that the main town centre uses defined by Class E fall under (a) – (g)(i); exclusive of the industrial employment uses that are defined under Class E (g) (ii) and (iii).